

**Initial Study & Environmental Analysis**  
**for**  
**Melon Properties, LLC**  
**Annexation, General Plan Amendment and Pre-Zone**



*Prepared by.*

**City of Holtville**  
**Planning & Building Department**

121 West Fifth Street  
Civic Center  
Holtville, CA 92250  
760-356-2912

**May 2020**



## City of Holtville Initial Study/Environmental Checklist

May 2020

- 1. Project Title:** **Melon Properties, LLC  
Annexation, General Plan Amendment and Pre-Zone**
- 2. Lead agency name and address:** **City of Holtville**  
121 West Fifth Street  
Civic Center  
Holtville, CA 92250  
  
Contact: Jeorge Galvan, City Planner  
The Holt Group, Inc.  
(760) 337-3883  
[jgalvan@theholtgroup.net](mailto:jgalvan@theholtgroup.net)
- 3. Co-Lead Agency:** **Imperial County Local Agency Formation Commission**  
1122 West State Street #D  
El Centro, CA 92243  
  
Contact: Jurg Heuberger, Executive Officer  
Phone: (760) 353-4115  
[jurgh@iclafoo.com](mailto:jurgh@iclafoo.com)
- 4. Project Sponsor:** **Owners:**  
**Melon Properties LLC**  
**Melon LLC**  
605 State Street  
El Centro, CA 92250  
(760) 960-1473  
  
John Hawk  
Melon LLC  
999 Keffer Road  
Holtville, CA 92250
- 5. Project Location:** The project site is located at the northeast corner of East Alamo Road (9th Street) and Melon Road. A portion of the project site is within the City of Holtville's incorporated boundaries while a majority of the project site is within the City's Sphere of Influence (SOI). The site is located adjacent and to the north of the city limits on five parcels: Assessor's

Parcel Numbers (APNs) 045-390-006 (within City Limits), 045-390-044, 045-390-065, 045-390-066, and 045-390-067. The Project also includes the possible construction of a 2,370 linear foot 3-inch polyvinylchloride (PVC) force main storm drain pipe along East Alamo Road connecting to the City of Holtville Drainage System. **Refer to Exhibit A – Project Location Map and Exhibit B – Project Vicinity Map, and Exhibit D – Force Main Alignment Detail.**

## 6. Project Description:

The proposed Project consists of the Lot Merger, Annexation, General Plan Amendment and Pre-Zone in support of the development of an 8.19-acre site with a 152-unit multi-family residential project along the northern city limits of the City of Holtville. Approximately 7.75 acres of the site require annexation into the City limits. The five parcels comprising the Project site currently have a land use designation of Low Density Residential (LDR). This designation does not allow for multi-family development. Therefore, a General Plan Amendment from LDR to High Density Residential (HDR) is required. Likewise, a Pre-Zone from the County zone R-1-U (Single-Family Urban) and R-1 (Single-Family Residential) to City zone R-3 Multi-Family with annexation is also necessary.

The Project is located at the corner of Melon Avenue and 9th Street in Holtville adjacent to city/county line within the SOI. The Project proposes 152 total multi-family dwelling units distributed amongst 13 buildings. The project will contain a mix of one-bedroom and two-bedroom units. A 0.34-acre Recreation Center will be centrally located within the project. Maintenance and laundry facility buildings will be located in the eastern portion of the proposed project.

Access to the site is proposed from two points. The main access will be located on the west side of the project off Melon Road. Secondary access will be located on the north side of the project along Tenth Street. No access points are proposed on the south or east sides of the Project. The proposed internal circulation plan is linear with a cul-de-sac located at the far east portion of the project site. Parking spaces line the interior roadway. A total of 266 parking spaces are proposed, 16 of which will be designated handicap to meet the Americans with Disability Act (ADA) requirement.

A 0.75-acre retention basin is proposed in the southwest corner of the Project site to capture stormwater runoff generated by the project. The retention basin will drain-out to the City of Holtville Drainage Swale that extends south along the east side of Melon Avenue beginning at the southeast corner of Melon Avenue and 9<sup>th</sup> Street through a new 3-inch diameter force-main drain pipe proposed at the southwest corner of the retention basin. Please Refer to **Exhibit C - Site Plan/Drainage Plan and Exhibit D – Force Main Alignment Detail.**

Additionally, the Pear Canal will be undergrounded either in its existing alignment or shifted 5 to 10 feet to the north within the Imperial Irrigation District (IID) right-of-way. The canal will be placed in a 36 to 48-inch pipe to be determined upon final design. The pipe will be buried 6 to 7-feet below grade with approximately 3 feet of cover. Construction of the undergrounded canal will be undertaken by IID and is anticipated to occur concurrent with construction of the Project (DuBose pers. comm., 2020).

**7. General Plan Designation:**

**Proposed Annexed Territory:**

**Existing City General Plan:** LDR - Low Density Residential

**Proposed City General Plan:** HDR - High Density Residential

**8. Zoning:**

**Proposed Annexed Territory:**

**Existing County Zoning:** R-1-U-Urban (Single-Family Urban)

**Existing City Zoning:** R-1 (Single-Family Residential)

**Proposed City Zoning:** R-3 - Multi-Family

**9. Surrounding Land Uses and Setting:**

The Project site is a vacant, undeveloped site comprised of five parcels refer to Photos 1-6). The site is surrounded by low density residential development. Single-family homes currently exist to the south across the street on 9<sup>th</sup> Street (Alamo Road). Five rural residential homes exist to the west across the street on Melon Road. Two rural residential homes are to the north. Additional rural residential homes exist adjacent to the Project site to the east.

**10. Other Agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)**

- a) Imperial County Local Agency Formation Commission (Annexation)
- b) Imperial County (Tax Share Agreement)
- c) Imperial County Public Works (Encroachment Permit for Stormwater Drain Pipeline)

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? Yes.**

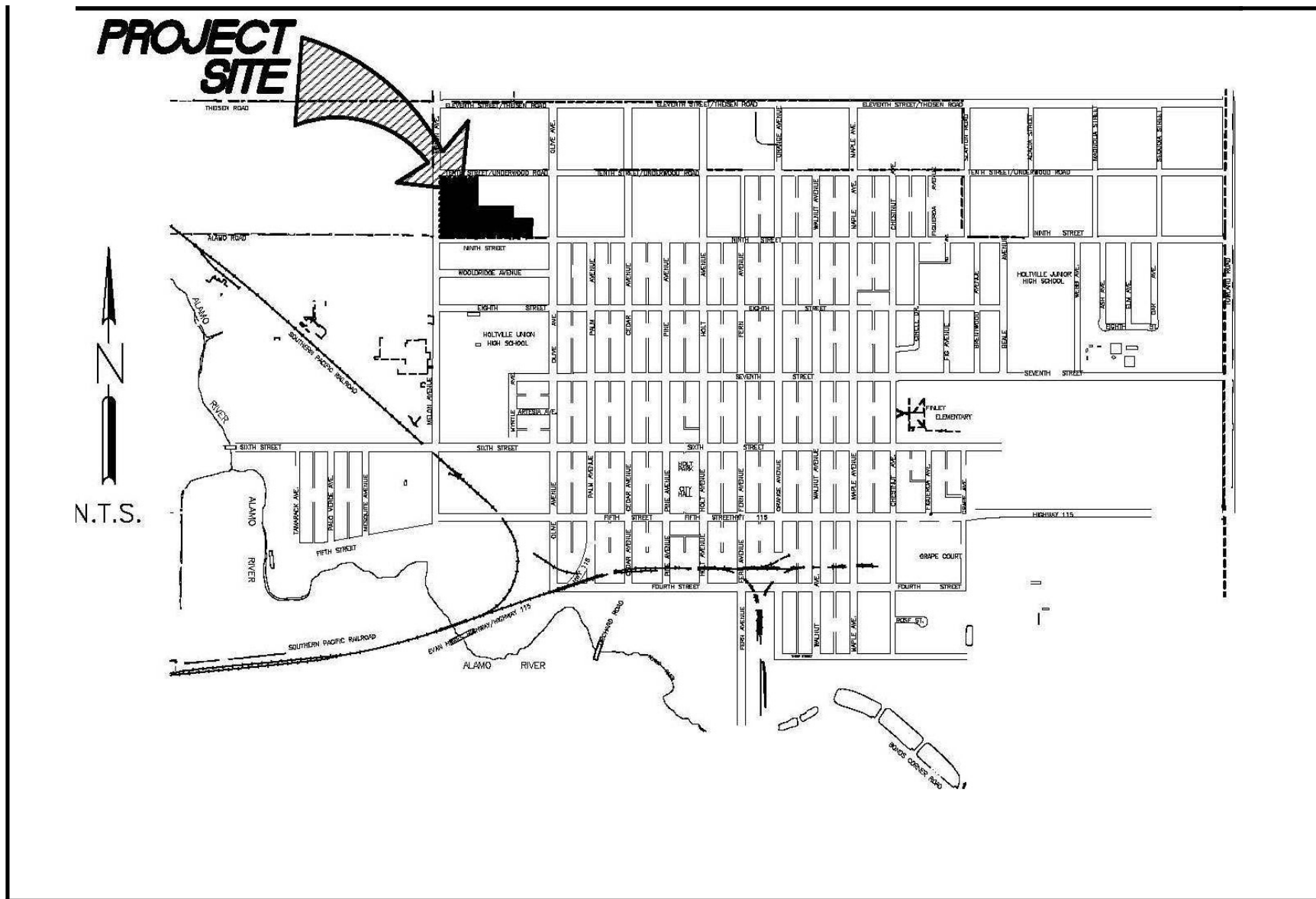
**If so, has consultation begun?**

Native American Heritage Commission (NAHC) contact occurred on August 28, 2017 with a response from the NAHC received August 31, 2017. Listed Tribes (shown below) were sent Initial Consultation Notices on September 5, 2017.

Ewiiapaay Tribal Office  
 Campo Band of Diegueño Mission Indians  
 Kwaaymii Laguna Band of Mission Indians  
 Lipay Nation of Santa Ysabel  
 Manzanita Band of Kumeyaay Nation

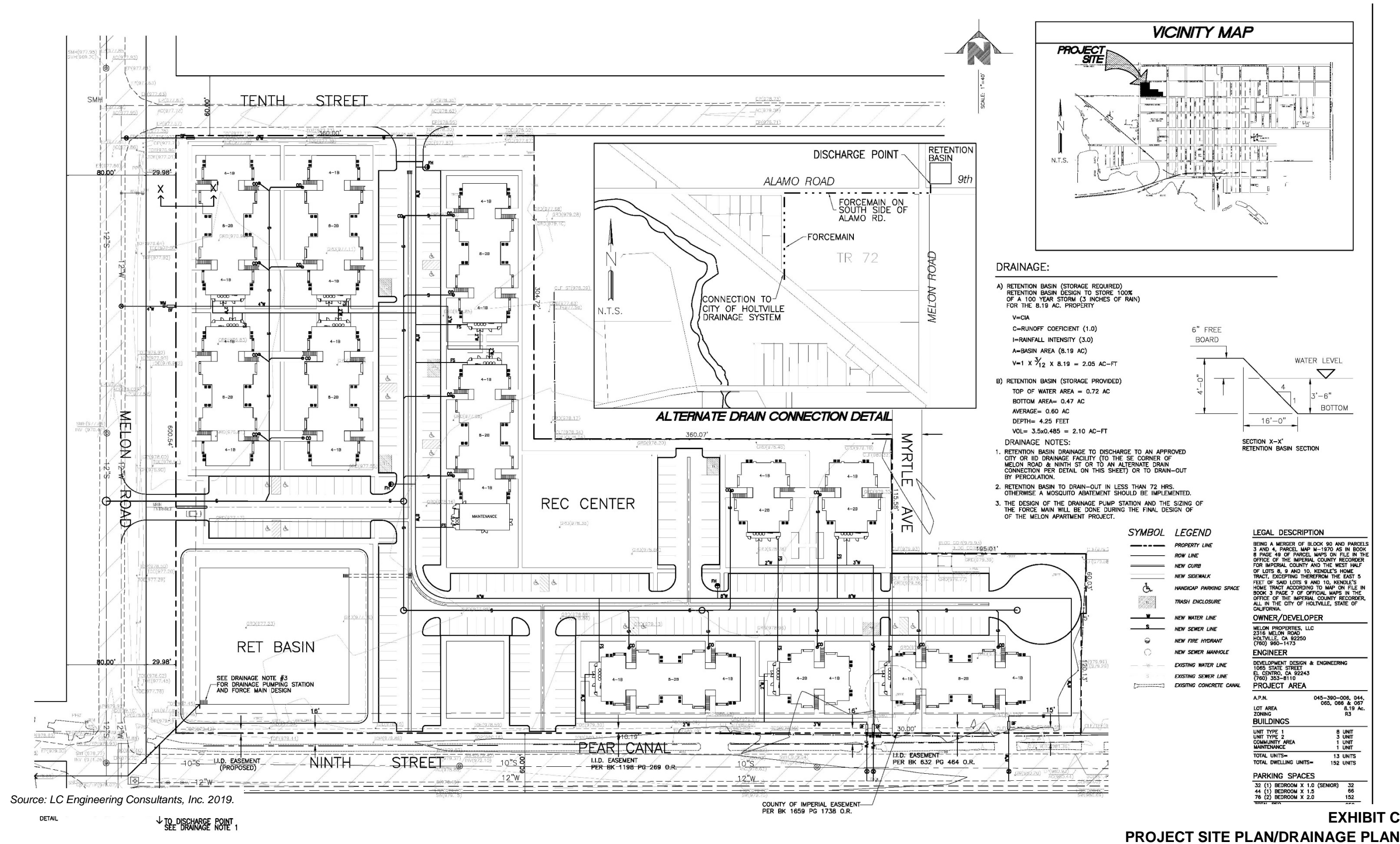
Jamul Indian Village of California  
 La Posta Band of Mission Indians  
 Sycuan Band of the Kumeyaay Nation  
 Cocopah Indian Reservation  
 Viejas Band of Mission Indians

As the Project did not move forward, another opportunity to consult was provided on December 23, 2019. The comment period closed on January 27, 2020. The outcome of the consultation process is provided in section XVIII, Tribal Cultural Resources.

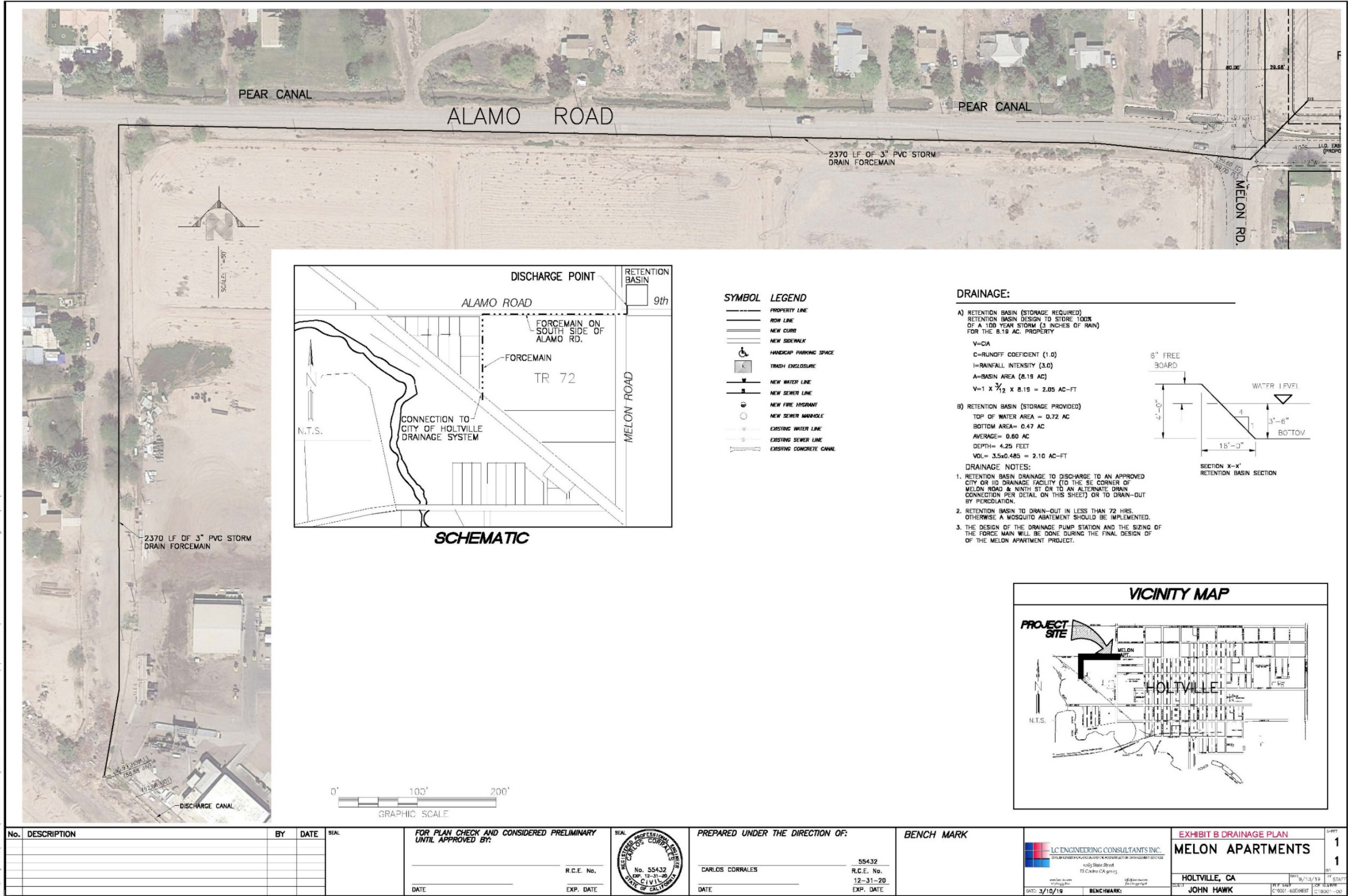


**EXHIBIT A**  
**PROJECT LOCATION MAP**





Source: LC Engineering Consultants, Inc. 2019.



Source: LC Engineering Consultants, Inc. 2019.

EXHIBIT D  
FORCEMAIN ALIGNMENT DETAIL



Photo 1: View northeast across Project site. Rural residential home to the north of the property visible at center of photo.



Photo 2: View northwest from 9<sup>th</sup> Street across southwest corner of Project site. Pear Canal is in foreground. Low density residential development is to the west. Overhead infrastructure is present along Melon Road.



Photo 3: View north across Project site. Two rural residential homes to the north of the property visible at center of photo. Trees border the eastern portion of the site. Pear Canal in foreground.



Photo 4: View southeast from the corner of Melon Road and 9<sup>th</sup> Street of existing low-density single-family homes. Pear Canal is visible at left of photo.



Photo 5: View east along Pear Canal adjacent to the north side of 9<sup>th</sup> Street. The Pear Canal is a concrete lined structure that extends west under Melon Road.



Photo 6: View west from the corner of Melon Road and 9<sup>th</sup> Street toward existing low-density single-family homes and outbuildings. Pear Canal is at right of photo.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

<input checked="" type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture/Forestry Resources	<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input checked="" type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	Hazards and Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input checked="" 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 REVIEW COMMITTEE DETERMINATION**

On the basis of the attached Initial Study, the Holtville Environmental Review Committee finds that:

The proposed project could not have a significant effect on the environment, and a <b>NEGATIVE DECLARATION</b> will be prepared.	
The proposed project could have a significant effect on the environment; however, there will not be a significant effect in this case because <b>the mitigation measures</b> described on an attached sheet have been added to the project. <b>A MITIGATED NEGATIVE DECLARATION</b> will be prepared.	X
The proposed project MAY have a significant effect(s) on the environment and an <b>ENVIRONMENTAL IMPACT REPORT</b> is required.	
The proposed project MAY have a significant effect(s) 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, if the effect is a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated." A <b>FOCUSED ENVIRONMENTAL IMPACT REPORT</b> is required, but it must analyze only the effects that remain to be addressed.	
Although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (1) have been analyzed in an earlier EIR pursuant to applicable standards and (2) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project. <b>No further action is required.</b>	

CA Department of Fish and Game  
**No Impact Finding**   ☐ Requested

Yes	No	Absent	Members of the EEC
			Public Works
			Police
			Fire
			Planning

George Galvan, City Planner

Date

			Administration
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## 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 is 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 Section 17, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis 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.

*Authority: Public Resources Code Sections 21083 and 21087. Reference: Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151; Sundstrom v. County of Mendocino, 202 Cal. App. 3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal. App. 3d 1337 (1990).*
- 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.

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

**Background:**

The proposed Project site is located on the northeast corner of Melon Road and 9th Street (East Alamo Road) in unincorporated Imperial County immediately adjacent to the City of Holtville. The Project site is currently vacant with weedy, ruderal vegetation. The Project requires annexation, a General Plan Amendment and Pre-Zone to accommodate the proposed 152-multi-family development. The proposed force main alignment extends west through disturbed right-of-way adjacent to the south side of Alamo Road and the east side of Melon Road.

Properties to the north, east, and west of the proposed Project site consist of very low-density rural residential uses. Farm animals are present on the properties within unincorporated areas. Areas to the south within incorporated areas consist of low-density single-family residential uses.

The surrounding area consists of flat topography with no scenic vistas. The site is surrounded by local roadways and is not adjacent to a scenic highway

**I. Aesthetics Impact Discussion****a) Have a substantial adverse effect on a scenic vista or scenic highway?**

**No Impact.** The area surrounding the Project site and force main alignment consists of vacant land as well as very low-density rural residential uses. The surrounding topography is flat and there are no scenic vistas. Likewise, no scenic highways align through or adjacent to the City of Holtville nor are there any designated state or County designated State Scenic Highways in Imperial County (Caltrans 2019). Therefore, the proposed

Project would have no impact with respect to having a substantial 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 site is vacant and currently borders the Holtville City limits. The proposed force main aligns through lands within Imperial County. Both the Project site and force main alignment have some scattered weeds and ruderal vegetation but does not contain any scenic resources such as rock outcroppings or historic buildings. Likewise, there are no scenic highways in the vicinity of the Project or force main alignment. Development of the proposed Project would permanently change existing views of the site by introducing a 152-unit residential development on currently vacant area. Views along the force main alignment and Pear Canal would be temporarily affected during construction. However, no impact would occur with respect to damaging scenic resources and historic buildings within a state scenic highway in association with the proposed Project.

c) **In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (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 governing scenic quality?**

**No Impact.** The Project site is located adjacent to an urbanized area (the northern city limits of Holtville) in southwestern Imperial County. Four of the Project site's five parcels are proposed to be annexed from the county into the city. The Project represents an expansion of the existing urban uses but at a higher density than surrounding low- and rural-density residential uses. The proposed high-density residential development would be two-story units approximately 35 feet in height. These structures would be visible to surrounding residential properties. Residential views are not considered public and no scenic vistas would be obstructed by the Project. The proposed retention basin in the southwest corner of the property would be visible from 9<sup>th</sup> Street and Melon Road. Travelers in vehicles along 9<sup>th</sup> Avenue and Melon Avenue would have brief views of the basin. Likewise, travelers along Alamo Road would experience temporary changes in visual character during construction of the force main and undergrounding of the Pear Canal.

The Project proposes a General Plan Amendment (GPA) from LDR to HDR and a zone change from R-1-U (existing County zoning) to R-3 multi-family (proposed City zoning). Upon approval of the annexation, GPA and zone change, the Project would be consistent with Holtville's General Plan and zoning. The Project would also be subject to Site Plan Review before the Planning Commission to ensure the design is consistent with applicable City standards. Therefore, the Project would have no impact with respect to conflicting with applicable zoning or other regulations governing scenic quality.

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

**Potentially Significant Impact Unless Mitigation is Incorporated.** The proposed

Project includes lighting on buildings and in parking areas (exterior lights, parking lot lights, vehicle headlights, etc.). Because the site is currently vacant, the proposed Project would introduce a new source of nighttime light that would be visible to existing uses in the area. Some glare may also be created from windows and car windshields during the daytime. The Project would also create a new source of light (exterior lights, parking lot lights, vehicle headlights), which may potentially affect nighttime views. Mitigation against visual impacts would need to be incorporated.

### **Mitigation Measure**

#### **AES-1 Light Reduction**

- All light sources shall be shielded to prevent light trespass outside the project boundary.
- The Project shall use low source lighting including bollard lighting and pole lighting not to exceed 16 feet in height with lights directed downward to minimize illumination of the nighttime sky.

*Timing/Implementation: As a Condition of Project Approval/During Construction.*

*Enforcement/Monitoring: City of Holtville Planning & Building Department.*

<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Background:**

The Project site has historically been used for agriculture but has remained vacant and undeveloped for more than twenty years. The surrounding land uses within the City limits on the

south and east are developed with low and rural density residential uses. The proposed force main alignment extends west on Alamo Road and south on Tamarack Road within existing disturbed right-of-way. Likewise, the Pear Canal is within existing IID right-of-way along the southern boundary of the Project adjacent to 9<sup>th</sup> Street. No agricultural lands are immediately adjacent to the Project site nor are there any forest lands within the City limits or in this portion of Imperial County. Lands to be annexed are currently designated “Urban Area” on the Imperial County Land Use Map (Imperial County 2007).

## **II. Agriculture and Forestry Resources Discussion**

### **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?**

**No Impact.** The Project site is designated as “Other Land” and the force main alignment extends through land designated “Urban and Built-Up Land” on the Imperial County Important Farmland 2016 Map prepared by the California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). Other Land is land not included in any other mapping category (e.g. Prime Farmland, Urban and Built-Up Land) and includes confined livestock facilities. Urban and Built-Up Land is occupied by structures with a building density of at least 1 unit to 1.5 acres or approximately 6 structures to a 10-acre parcel (DOC 2017). Thus, the Project would have no impact regarding converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

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

**No Impact.** The Project site and force main alignment are designated “Urban Area” on the Imperial County Land Use Plan (Imperial County 2007). The Project site is Zoned R-1-U (Single Family Urban) and R-1 (Single-Family Residential) and the force main aligns through areas zoned C-2-U (General Commercial Urban Areas) and M-1-U (Light Industrial Urban Areas). The parcels on which the Project is proposed are not under a Williamson Act Contract nor are there any lands that are under Williamson Act Non-Renewal adjacent to the site. In 2010, the Board of Supervisors voted to non-renew all land under Williamson Act contract and end the tax reduction it had provided to the owners of about 1,200 parcels of agricultural land in Imperial County (IC Assessor Website). The Williamson Act Non-Renewal designation is used for enrolled lands for which non-renewal has been filed pursuant to Government Code Section 51245. Effective January 1, 2011, non-renewal was filed either by the landowner or the County for all Williamson Act Contracts in Imperial County. The proposed Project would have no impact on surrounding Williamson Act Contracts in non-renewal.

### **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 Imperial County General Plan, Conservation and Open Space Element (Imperial County 2016) does not identify any forest or timberland within the County nor are there any such lands within the City limits. Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on or near the Project site that would conflict with existing zoning. No impact on forest land or timberland would occur.

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

**No Impact.** There are no existing forest lands either on-site or in the immediate vicinity of the Project site. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

**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 proposed Project would expand the existing development pattern of the City of Holtville on land that is designated “Other Land” on the Imperial County Important Farmland 2016 Map (DOC 2017). The Project site is surrounded by low-density single-family residences and rural residential uses but is not directly adjacent to any farmland. Likewise, no forest lands are near the Project site. Therefore, the Project would have no impact to the existing environment with respect to conversion of Farmland to a non-agricultural use or forest land to a non-forest use.

<b>III. AIR QUALITY.</b> <i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to the following determinations. Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>

**Background:**

The analysis in this section is based on the Air Quality & Greenhouse Gas Impact Analysis Melon Properties, LLC. (OB-1 2020) (Appendix A). The California Air Resources Control Board (CARB) is the State agency responsible for establishing California Ambient Air Quality Standards (CAAQS), adopting and enforcing emission standards for various sources including mobile sources (except where federal law preempts their authority), fuels, consumer products, and toxic air contaminants. CARB is responsible for responding to the Federal Clean Air Act (FCAA),

regulating emissions from motor vehicles and consumer products, and implementing the state Clean Air Act (CAA).

The Imperial County Air Pollution Control District (ICAPCD) shares responsibility with CARB for ensuring that all State and federal ambient air quality standards are achieved and maintained within the County. The Project site is within the Salton Sea Air Basin (SSAB).

As of February 28, 2019, the designation for the PM<sub>10</sub> standard is nonattainment. The ICAPCD is in the process of requesting an attainment re-designation and maintenance plan. However, Imperial County's 2017 Ozone State Implementation Plan (SIP), demonstrates that Imperial County is in attainment of the 2008 8-hour ozone standard but for emissions emanating across the international border. In addition, a weight-of-evidence analysis has been included to show that Imperial County will maintain this status of attainment through the July 2018 attainment date.

As of November 2017, after consideration of CARB's recommendations, the EPA "is designating Imperial County, CA as nonattainment for the 2015 ozone NAAQS".

Construction of the Project would result in temporary emissions of ROG, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Emissions from construction activities would result from fuel combustion and exhaust from construction equipment and vehicle traffic (i.e., worker commute and delivery truck trips), and grading and site work. Construction work included work to install force-main drainpipe, required to improve the 9th Street Ditch. Emissions are estimated using the California Emissions Estimator Model (CalEEMod™), Version 2016.3.2, using model defaults except for employee information provided by the client.

Operation of the Project would result in emissions of ROG, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Emissions would be generated from the vehicular travel of the residents and service vehicles; natural gas usage; consumer products; landscaping; and architectural coatings. The analysis below is based on the Air Quality Impact Analysis prepared for the Project (OB-1 2020).

### **III. Air Quality Discussion:**

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

**a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?**

**Less than Significant Impact.** CEQA requires that projects be consistent with the applicable Air Quality Management Plan (AQMP). A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision-makers of the environmental efforts of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed.

On November 13, 2009, the Environmental Protection Agency (EPA) published Air Quality Designations for the 2006 24-Hour Fine Particle (PM<sub>2.5</sub>) National Ambient Air Quality Standards (NAAQS), wherein Imperial County was listed as designated non-attainment for the 2006 24-hour PM<sub>2.5</sub> NAAQS. On April 10, 2014, the CARB gave final approval to the 2013 Amendments to Area Designations CAAQS. For the State PM<sub>2.5</sub> standard, effective

July 1, 2014, the Calexico area was designated nonattainment, while the rest of the SSAB was designated attainment. The Project lies outside the Calexico nonattainment area. The ICAPCD CEQA Air Quality Handbook states that a CAQAR of a proposed project should demonstrate compliance with the most recent ozone AQMP and PM<sub>10</sub> SIP. It also states the CAQAR should also demonstrate compliance with the Imperial County Rules and Regulations but also those of the State and federal regulations.

#### Ozone Air Quality Management Plan (AQMP)

In order to develop the Modified AQMP, a control strategy for meeting State and federal requirements is required. The ICAPCD control strategy included an interactive process of technology and strategy review supported by ambient air quality modeling. The air quality modeling assists in identifying current and remaining emission targets that would help to achieve the ambient air quality standards. The Modified AQMP control measures consist of three components: 1) the ICAPCD's Stationary Source Control Measures; 2) Regional Transportation Strategy and Control Measures; and 3) State Strategy. These measures primarily rely on the traditional "command and control" approach and as such provide the framework for ICAPCD Rules that reduce ROG and NOX emissions.

At the heart of the AQMP are viable emission forecasts, which are used to evaluate effectiveness of control measures. The emission forecast provides estimates of future year emissions by projecting the effects of economic growth and existing regulations on future year emission inventories. For on-road motor vehicles vehicle emissions were projected using changes in activity levels related to vehicle miles travelled (VMT), vehicle turnover, emission controls, fuel characteristics, and consumer purchase patterns, primarily provide by CARB. The Project growth will not have a major impact on emission forecasts used in the AQMP.

#### PM<sub>10</sub> State Implementation Plan (PM<sub>10</sub> SIP)

The PM<sub>10</sub> SIP was required to address and meet the following elements, required under the FCAA of areas classified to be in serious nonattainment of the NAAQS:

- Best available emission inventories.
- A plan that enables attainment of the PM<sub>10</sub> federal air quality standards.
- Annual reductions in PM<sub>10</sub> or PM<sub>10</sub> precursor emissions that are of not less than 5 percent from the date of SIP submission until attainment.
- Best available control measures and best available control technologies for significant sources and major stationary sources of PM<sub>10</sub>, to be implemented no later than 4 years after reclassification of the area as serious.
- Transportation conformity and motor vehicle emission budgets in accord with the attainment plan.
- Reasonable further progress and quantitative milestones.
- Contingency measures to be implemented (without the need for additional rulemaking actions) if the control measure regulations incorporated in the plan cannot be successfully implemented or fail to give the expected emission reductions.

In November 2005, revised Regulation VIII fugitive dust control measures were adopted, which form the core of the Imperial County PM<sub>10</sub> control strategy. Portions of Regulation VIII that would apply to Construction and Earthmoving Activities are:

- Required to limit Visible Dust Emissions to 20% opacity by complying with the following measures:
  - o Phase work to minimize the amount of disturbed surface area at one time.
  - o Apply water or chemical stabilization.
  - o Construct and maintain wind barriers around the activity site.
  - o Restrict vehicular access to the area by fencing or signage.
  - o Mitigate track out/carry out of bulk materials at the site in compliance with Rule 803.
  - o Transport bulk material to, from, and around the site in compliance with Rule 802.
- For unpaved haul/access roads, unpaved traffic areas larger than 1 acre and with ≥ 75 average vehicle trips per day (AVTD), unpaved roads with ≥ 50 AVTD, and canal roads with ≥ 20 AVTD, visible dust emissions must be limited to 20% opacity by applying at least one of the stabilization methods described below:
  - o Paving
  - o Applying chemical stabilization as directed by the product manufacturer
  - o Applying and maintaining gravel, crushed/recycled asphalt or other material of low silt content (<5%) to a depth of three or more inches, or
  - o Applying water one or more times daily.

Operational activities related to the Project would not generate enough traffic to significantly impact regional transportation emissions budgets; will comply with all applicable ICAPCD Rules and Regulations; and will comply with all applicable State and federal requirements for attainment of air quality objectives. Therefore, this impact is considered 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?**

**Potentially Significant Impact Unless Mitigation is Incorporated.**

Project-Related Construction Emissions

Construction of the Project would result in emissions of the air pollutants ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>x</sub>. Emissions from construction would result from fuel combustion and exhaust from construction equipment and vehicle traffic and fugitive dust from earth moving operations and roadways. Emissions from construction activities were estimated using CalEEMod.

ICAPCD CEQA Guidance recognizes the temporary effect of construction-related emissions, particularly regarding PM<sub>10</sub> emissions (i.e. past “experience has shown that the emissions from construction can cause substantial increases in localized concentrations of PM<sub>10</sub>”). **Table AQ-1** summarizes unmitigated construction emissions based on CalEEMod. As

shown, the Project is estimated to emit up to 323.5 pounds per day of PM<sub>10</sub> during construction. CalEEMod outputs are in **Appendix A**.

**TABLE AQ-1  
UNMITIGATED CONSTRUCTION EMISSIONS**

Activity Year	Unmitigated Emissions (pounds per day)				
	ROG	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 2020	4.5	47.9	31.6	242.3	25.2
Year 2021	96.8	31.	33.9	323.5	33.7
Project Maximum Daily	96.8	47.9	33.9	323.5	33.7

Source: OB-1 2020, p. 25.

The ICAPCD CEQA Air Quality Handbook states that for industrial development projects, the thresholds should be used only to determine significance of the impact from mobile source emissions (i.e. truck trips) attracted to the stationary source and would not be used to determine significance for the air emissions associated with the stationary source, including off-road mobile emissions produced within the stationary source.

While construction PM<sub>10</sub> emissions can vary greatly depending on the phase of the construction, level of activity, and other factors, there are feasible mitigation or control measures which can be implemented to reduce PM<sub>10</sub> emissions significantly. Because particulate emissions from construction activities have the potential of leading to adverse health effects as well as nuisance concerns, such as reduced visibility, all projects are required to mitigate construction emission impacts through compliance with ICAPCD Regulation VIII (shown below) as presented in the ICAPCD's CEQA Handbook:

- All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.
- All on-site and off-site unpaved roads will be effectively stabilized, and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- All unpaved traffic areas one acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.
- All track-out or carry-out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area.

- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of enough water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
- The construction of any new unpaved road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.

*Timing/Implementation: During construction/Project Contractor.*

*Enforcement/Monitoring: City of Holtville.*

#### Project-Related Operational Emissions

**Table AQ-2** summarizes the estimated unmitigated operational emissions of the Project. As shown, the Project exceeds the ICAPCD Regional Operational Threshold for PM<sub>10</sub>. This exceedance is overwhelmingly due to fugitive dust from on-road vehicular activity. As discussed in construction above, the ICAPCD assumes 50 percent of the VMT will be on unpaved roads. This is considered a potentially significant impact unless mitigation is incorporated.

**TABLE AQ-2  
UNMITIGATED OPERATIONAL EMISSIONS**

Sources	Pounds per Day				
	ROG	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	4.15	0.14	12.55	0.07	0.07
Energy	0.07	0.59	0.25	0.05	0.05
Mobile	2.99	18.86	27.83	1,677.44	167.45
Totals	7.2	19.6	40.6	1,677.60	167.60
ICAPCD Threshold	137	550	137	150	550
Significant (Y/N?)	N	N	N	Y	N

Source: OB-1 2020, p. 27.

#### Cumulative Health Impacts

The Project site is in a nonattainment area for ozone and PM<sub>10</sub> which means that the background levels of these pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, sensitive individuals may experience adverse health effects.

In this analysis, the CalEEMod results show the predominant construction related PM<sub>10</sub> impact comes from on-road entrained road dust. By default, CalEEMod assumes the percentage of paved and unpaved roads for each APCD. The ICAPCD has established that 50 percent of Vehicle Miles Traveled (VMT) in Imperial County is on paved roads and 50 percent is on unpaved roads. Dust generated on a cumulative level from travel on unpaved roads is considered potentially significant unless mitigation is incorporated.

### Cumulative Analysis

In accordance with CEQA Guidelines 15130(b), this analysis of cumulative impacts incorporates a summary of projections. The following three-tiered approach is to assess cumulative air quality impacts.

- Consistency with the ICAPCD project specific thresholds for construction and operation.
- Project consistency with existing air quality plans.
- Assessment of the cumulative health effects of the pollutants.

### *Project Specific Thresholds*

As previously established in the discussion under item “a)” above, implementation of mitigations and compliance with ICAPCD regulations are expected to reduce impacts below established thresholds. It is assumed that emissions that do not exceed the project specific thresholds will not result in a cumulative impact and are less than cumulatively considerable.

### *Air Quality Plans*

The area in which the Project is located is in nonattainment for ozone and PM<sub>10</sub>. As such, the ICAPCD is required to prepare and maintain an AQMP to document the strategies and measures to reach attainment of ambient air quality standards. While the ICAPCD does not have direct authority over land use decisions, the District acknowledges that changes in land use and circulation planning are necessary to maintain clean air. As discussed under item “a)” above, the Project is compliant with the AQMP. Therefore, impacts to the AQMP are considered less than significant.

### *Cumulative Health Impacts*

The Project is in an area that is in nonattainment for ozone and PM<sub>10</sub>. This means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some of the sensitive individuals of the population experience adverse health effects.

The localized significance analysis discussed under item “c)” showed that during construction no localized adverse exposure was expected; therefore, the emissions of particulate matter and NO<sub>x</sub> would not result in a significant cumulative health impact.

As shown in **Table AQ-3**, compliance with regulations and implementation of the mitigation measures AQ-1 and AQ-2 would result in a reduction of the Project’s construction emissions below ICAPCD thresholds. The Project would not result in a cumulatively considerable net increase of PM<sub>10</sub> during construction.

As shown in **Table AQ-4**, compliance with regulations and implementation of the mitigation measure AQ-1 will result in a reduction in emissions occurring during operation to below ICAPCD thresholds. The Project would not result in a cumulatively considerable net increase of PM<sub>10</sub> during operation.

### **Mitigation Measures**

#### **AQ-1: Block Dirt Roads**

The developer will construct permanent blockage to all dirt roads and open areas bordering the Project prior to beginning construction.

*Timing/Implementation: Prior to beginning construction/Project Developer.*

*Enforcement/Monitoring: City of Holtville.*

#### **AQ-2: Discretionary Measure for Fugitive PM<sub>10</sub> Control**

- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

*Timing/Implementation: During construction/Project Contractor.*

*Enforcement/Monitoring: City of Holtville.*

**Table AQ-3** shows construction emissions after implementing MM AQ-1, MM AQ-2 and MM AQ-3. As shown, PM<sub>10</sub> emissions would be reduced below the 150 pounds per day threshold.

**TABLE AQ-3  
MITIGATED CONSTRUCTION EMISSIONS**

Activity Year	Unmitigated Emissions (pounds per day)				
	ROG	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 2020	4.5	47.9	31.6	8.8	5.3
Year 2021	96.8	31.0	33.9	2.0	1.6
Project Maximum Daily	96.8	47.9	33.9	8.8	5.3

*Source: OB-1 2020, p. 29.*

During Project operation, implementation of MM AQ-1 will continue to be in effect with the permanent blockage, thereby reducing the fugitive dust from on-road traffic. PM<sub>10</sub> emissions would be below ICAPCD thresholds during Project operation.

**TABLE AQ-4  
MITIGATED OPERATIONAL EMISSIONS**

Sources	Pounds per Day				
	ROG	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	4.15	0.14	12.55	0.07	0.07
Energy	0.07	0.59	0.25	0.05	0.05
Mobile	2.99	18.86	27.83	3.57	0.98
Totals	7.2	19.6	40.6	3.7	1.1
ICAPCD Threshold	137	550	137	150	550
Significant (Y/N?)	N	N	N	N	N

*Source: OB-1 2020, p. 27.*

#### **c) Expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact Unless Mitigation is Incorporated.** Sensitive receptors are defined as land uses where sensitive population groups are likely to be located (e.g., children, the elderly, the acutely ill, and the chronically ill). These land uses include residences, schools, childcare centers, retirement homes, convalescent homes, medical

care facilities, and recreational facilities. Sensitive receptors that may be adversely affected by the Project include surrounding residential land uses.

Impacts to sensitive receptors, particularly from dust, would vary depending on the level and type of activity, the silt content of the soil, and prevailing weather. The Project site is surrounded by low density urban development. Single-family homes currently exist to the south across the street on Alamo Road. Five rural residential homes exist to the west across the street on Melon Road. One rural residential home is located to the north, across the street on Tenth Street (Underwood Road). Additional rural residential homes are adjacent to the east of the Project site. Exposure to dust during construction is considered a potentially significant impact unless mitigation is incorporated.

A project can also create pollution concentrations in the form of a CO hotspot. This occurs when vehicles are idling at highly congested intersections. According to the Draft Traffic Impact Analysis (LOS 2020), all intersections were calculated to operate at a level of service B or better during both the AM and PM peak hours with the addition of project traffic, thus not reaching the congestion necessary for a potential hotspot.

During construction activities, diesel equipment will be operating and diesel particulate matter (DPM) is known to the State as a toxic air contaminant (TAC). However, the risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined as 24 hours per day, 7 days per week, 365 days per year, for 70 years. Due to the short-term duration of project construction, resident exposure to diesel exhaust emissions would not be significant.

#### **Mitigation Measures**

Implement Mitigation Measure MM AQ-1 and MM AQ -2 in addition to compliance with Regulation VIII.

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less than Significant Impact.** The CEQA Guidelines indicate that a significant impact would occur if a project would create objectionable odors affecting a substantial number of people. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generate citizen complaints to local governments and the ICAPCD. Because offensive odors rarely cause any physical harm and no requirements for their control are included in State or federal air quality regulations, the ICAPCD has no rules or standards related to odor emissions, other than its nuisance rule.

The Project is not an odor producer nor located near an odor producer. While diesel exhaust will be emitted during construction (which is objectionable to some), concentrations will disperse rapidly from the Project site. In addition, the area surrounding the Project site only has a few residences and a substantial number of people would not be adversely affected. Therefore, the Project would have a less than significant impact regarding emissions affecting a substantial number of people.

<b>IV. BIOLOGICAL RESOURCES.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Background:**

A Biological Technical Report (Barrett 2017) was prepared for the Project site documenting existing conditions and potential for biological resources (Appendix B). This was followed by a Biological Resources Technical Addendum (Barrett 2019) prepared for the 2,370 linear feet of 3-inch PVC pipe (i.e. the force main) extending west on Alamo Road from the intersection of Melon and Alamo Roads and then south along Tamarack Road.

The Project site is vacant land surrounded by low- density single-family and rural residential development. Land uses surrounding the force main alignment include vacant lots and low-density residential areas.

Approximately 500,000 acres of the Colorado Desert in Imperial County has been converted to agricultural use. The Project site is within that conversion area. Little native vegetation is present on the Project site or within the force main alignment.

A biological survey of vegetation, animals and a focused western burrowing owl survey was completed on June 27, 2017 (Project site) and November 6, 2019 (force main alignment). Both surveys were conducted using the California Department of Fish and Wildlife (CDFW) Staff Report (CDFW 2012) and communications with the CDFW, Bermuda Dunes, CA office. The Project site, Pear Canal and force main alignment were searched for burrowing owls, a CDFW species of concern, and signs indicative of occupancy (e.g. burrows, pellets, feathers, scat, litter, and animal dung). No Burrowing owls or burrows were observed on the site or within the proposed force main alignment. Habitat is not favorable for burrowing and burrowing owl would be not expected on the site or within the force main alignment (Barrett 2017, p. 6; 2019, p. 2).

During the surveys, a total of 20 zoological species were observed or heard using the site, the proposed force main alignment or the immediate vicinity. **Table BIO-1** lists the zoological species identified during the surveys.

**TABLE BIO-1**  
**ZOOLOGICAL SPECIES OBSERVED ON AND IN THE VICINITY OF THE PROJECT SITE**

Common name	Scientific name
Doves	<i>Zenaidap macroura/Columbia passerine/Streptopelia decaocto</i>
Crickets (heard)	<i>Gryllodes sigulatus</i>
Gopher mounds	<i>Thomomys sp.</i>
Pigeon	<i>Columba livia</i>
Ants	<i>various</i>
Bees	<i>Apis mellifera</i>
Grackle	<i>Quiscalus mexicanus</i>
Dog, cat, human tracks	
House sparrow	<i>Passer domesticus</i>
Domestic chickens	<i>various</i>
Banded Gecko	<i>Coleonyx</i>
Desert termite	<i>Apocrita</i>
Dragonfly/damselfly	<i>various</i>
Eurasian Collared Dove*	<i>Streptopelia decaocto</i>
Pocket gopher*	<i>Thomomys bottae</i>

Source: Barrett 2017, p. 42, 2019 p.2\*.

**Table BIO-2** summarizes the botanical species observed on site. Ruderal vegetation is found on the vacant lot. Weedy plants such as saltcedar, Russian thistle and white horse nettle were found. The vegetation community would be considered ruderal and there is little native vegetation on the Project site (including the potential alignment of the Pear Canal) or within the force main alignment.

**TABLE BIO-2**  
**BOTANICAL SPECIES OBSERVED ON AND IN THE VICINITY OF THE PROJECT SITE**

Common name	Scientific name
Bermuda grass	<i>Cynodon dactylon</i>
Saltcedar	<i>Tamarix sp.</i>
Quail bush	<i>Atriplex lentiformis</i>
Saltbush	<i>Atriplex canescens</i>
Mustards	<i>various</i>
Saltgrass	<i>Distichlis spicata</i>
Russian thistle	<i>Salsola sp.</i> (Invasive)
Prostrate pigweed	<i>Amaranthus blitoides</i>
Spiny aster	<i>Chloracantha spinosa</i>
White horse nettle	<i>Solanum elaeagnifolium</i>
Palo verde	<i>Cercidium floridum</i>
Residential trees	<i>various</i>

Source: Barrett 2017, p. 42.

#### IV. Biological Resources Discussion:

- 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?**

**No Impact.** The 8.19-acre Project site, location of the realigned Pear Canal, and 2,370 linear foot force main alignment are completely disturbed and vacant aside from ruderal vegetation. The Imperial Valley has most of the burrowing owls in southern California. Irrigation canals and drains are commonly used by burrowing owl as nesting sites in this area. The burrowing owl is a CDFW Species of Special Concern, and a Federal Species of Concern and is listed on the Migratory Bird Treaty Act. No burrowing owls or burrows were observed on site during the focused burrowing owl survey conducted on June 27, 2017 and November 6, 2019. The on-site habitat is not favorable to burrowing and no owls were identified or expected within the boundaries of the site. Likewise, based on the existing conditions on the Project site, no species identified as a candidate, sensitive, or special status species would be present. No impact would occur (Barrett 2017, p. 6; 2019, p. 2). As no burrowing owl habitat was found on or adjacent to the Project site, no further burrowing owls surveys are required. Therefore, the proposed Project would not 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 CDFW and USFWS. No impact would occur.

- 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.** As noted under item a) above, the Project site, location of the realigned Pear Canal, and force main alignment are completely disturbed and contains weedy and ruderal vegetation. No riparian communities are present. Sensitive habitats are those that are designated either rare within the region by governmental agencies or known to support sensitive animal or plant species and/or they serve as “corridors” for wildlife within the region. Although the western burrowing owl (species of special concern) is abundant in the area, the presence of the owls is due to manmade features such as the irrigation canals, ditches and drains and the cultivation of agricultural crops within the region and rather than “native” factors. This is also true for the Mountain Plover and several species of raptors.

The biological survey of vegetation, animals and a focused burrowing owl survey completed on June 27, 2017 and November 6, 2019 did not identify any riparian habitat, wetlands, or wildlife corridors (Barrett p. 7, 2017 and 2019). Therefore, the Project would have no impact on any riparian habitat or other sensitive natural community.

- c) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** As noted under item a) above, the Project site is completely disturbed and contains weedy and ruderal vegetation. Surveys conducted on June 27, 2017 and November 6, 2019 did not identify any federally protected wetlands within the boundaries of the site. Therefore, the Project would have no impact on federally protected 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.** Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. The Project site is in an urbanized area along the northern city limit of Holtville and is not directly adjacent to any large areas of open space or agricultural land. Surveys conducted on June 27, 2017 and November 6, 2019 did not identify any wildlife corridors (Barrett 2017 and 2019). Therefore, no impact to interfering with the movement of wildlife would occur.

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

**Potentially Significant Unless Mitigation Incorporated.** As discussed under item a) above, the Project site is completely disturbed but does contain ruderal vegetation as well as a palm tree, paloverde trees, and saltcedar. Based on surveys conducted on June 27, 2017 and November 6, 2019, no biological resources are anticipated to be present. However, burrowing owl is abundant in the area due to manmade features (e.g. canals, ditches). This results in owls creating habitats within the brims and banks of agricultural fields. While no burrowing owl habitat was found on the site, burrowing owls have been located in the vicinity of the Project site. Thus, there is potential for conflicts to occur regarding burrowing owl, a species of special concern. In addition, nesting birds may be present in on-site vegetation and could be impacted during construction. Thus, the

proposed project is anticipated to have a potentially significant impact unless mitigation is incorporated regarding local policies or ordinances protecting burrowing owl.

### **Mitigation Measures**

#### **BIO-1: Conduct Pre-Construction Survey**

If construction starts between January 1 and August 31, a pre-construction survey for nesting birds shall be performed by a qualified biologist within 3 days prior to initiating ground disturbance. A report should be submitted to the appropriate agency.

*Timing/Implementation: Three days prior to commencing construction/Qualified biologist.*

*Enforcement/Monitoring: City of Holtville Planning & Building Department/Qualified biologist.*

#### **BIO-2: Conduct WEAP Training**

Prior to starting work, construction foremen, workers and on-site employees shall be given Worker Environmental Awareness Program (WEAP) training by a qualified biologist regarding burrowing owl. WEAP training shall include the following:

- Description of owl/nesting birds
- Biology
- Regulations (CDFW/USFWS)
- Wallet card with owl picture/guidelines for protecting owl and wildlife
- Notification procedures if avian species (dead, alive, injured) is found on or near site

*Timing/Implementation: Prior to starting work/Qualified biologist.*

*Enforcement/Monitoring: City of Holtville Planning & Building Department/Qualified biologist.*

**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?**

**No Impact.** The proposed Project is not located within a local, regional, or state conservation planning area. The Project would have no impact on an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

<b>V. CULTURAL RESOURCES.</b> Would the Project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Background:

A Phase I Cultural Resources Survey was prepared for the proposed project (BFSA 2017) (Appendix C). The Area of Potential Effect (APE) includes the four parcels in Imperial County (APNs 045-390-044, 045-039-045, 045-390-066, 045-390-067) that are proposed to be annexed and the one parcel that is currently within the jurisdiction of the City of Holtville (APN 045-390-006). The survey of the site was conducted on September 8, 2017 to determine if cultural resources exist within the APE. Visibility during the survey was excellent. The APE was characterized as flat and previously cleared and disked. Research into the APE indicates that structures once stood on the Project site. However, it appears that all signs of the structures have been removed (BFSA 2017, p.1).

A historic aerial photograph from 1953 shows most of the site used for agriculture with one structure in the southwest corner and two structures within the southeast corner of the APE. The two structures appear to have been removed around 2010 (BFSA 2017, p.9).

A records search was conducted at the South Coastal Information Center (SCIC) at San Diego State University (SDSU). The records search indicated that while there are no previously recorded prehistoric resources recorded within the APE, seven recorded historic resources were identified within a one-mile radius (BFSA 2017, p.1).

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC). The SLF search failed to indicate the presence of Native American cultural resources within or in the vicinity of the APE. A list of Native American contacts was provided by the NAHC, and in accordance with their recommendations, BFSA sent letters to all Native American contacts listed, informing the tribes about the nature of the project (BFSA 2017, p.1). Consultation under SB 18 was initiated again in December 23, 2019. The invitation to consult period closed on January 27, 2020 with no Tribes responding. However, the Cultural Resource Survey submitted in 2017 included a request from the Viejas Band of Kumeyaay Indians to be present during ground-disturbing activities as they have cultural ties to the project area. Protocol is implemented to require recordation should human remains, cremation sites, or cultural artifacts be found during ground disturbances (City of Holtville 2018).

## V. Cultural Resources Impact Discussion:

### a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

**No Impact.** The records search performed for the Project indicated that seven historic resources were identified within a one-mile radius of the APE. These resources are identified in Table CR-1.

**TABLE CR-1**  
**HISTORIC RESOURCES WITHIN ONE MILE OF THE APE**

Site Number	Site Description
P-13-008980	Holt Park (historic community buildings)
IMP-7363/H	Ash Main Canal
P-13-014989	Holton Interurban Railway Bridge

IMP-12, 447, IMP-12, 448 IMP-12, 449, and IMP-12, 450	Historic Trash Scatter
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Source: BFSA 2017.

The records search results also indicated that six historic addresses have been recorded and nine cultural resource studies have been conducted within a one-mile radius of the Project site (BFSA 2017, p. 8). One of the studies included the Project site; however, no resources were discovered within the Project APE as part of the study. It appears the APE has been disturbed through years of cultivation, disking, and the removal of structures (BFSA 2017, p. 9). As a result of the Phase I survey, no cultural resources were discovered, and no further study is recommended (BFSA 2017, p. 1). Therefore, no impact to a historical resource would occur in association with the proposed Project.

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

**No Impact.** An archaeological records search was conducted at the SCIC at SDSU to gather information regarding recorded cultural resources within or adjacent to the project. In addition, a cultural resources survey of the Project site was performed on September 8, 2017 by conducting an intensive reconnaissance of the APE in 10 meter transects. All areas of disturbed ground and any rodent burrows were analyzed for evidence of buried archaeological deposits (BSFA 2017, p. 8). No archaeological sites, features, or artifacts were identified during the field reconnaissance and no potential impacts to cultural resources are anticipated in association with development of the proposed Project. Based upon the previous ground-disturbing activities and the absence of recorded cultural resources within the boundaries of the site, there is little potential for cultural resources to be present/disturbed by the proposed Project (BFSA 2017, p. 11). Therefore, no impact is identified regarding an archeological resource.

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

**Potentially Significant Impact Unless Mitigation Incorporated.** As described in item a) above, due to previous years of disturbance, it is not likely that human remains would be found on the Project site. However, as part of the Phase I Cultural Resources Survey, BFSA requested a records search of the Sacred Lands File (SLF) of the Native American Heritage Commission (NAHC). The NAHC SLF search did not indicate the presence of a sacred site within the search radius. A list of Native American contacts was also provided by the NAHC, and in accordance with their recommendations, BFSA contacted all Native American consultants listed informing the tribes about the nature of the project. BFSA received three responses in total. The San Pasqual Band of Mission Indians indicated that the project is out of their territory (San Pasqual 2017). The Cocopah Indian Tribe indicated that they have no comments and do not require further information regarding the project (McCormick 2017). The response from the Viejas Band of Kumeyaay Indians (Teram 2017) indicated the APE is within an area they have cultural ties to and requested to be present during ground disturbing activities. Therefore, impacts to human remains are considered potentially significant unless mitigation is incorporated.

### **Mitigation Measures**

#### **CR-1: Tribal Notification**

The Viejas Band of Kumeyaay Indians shall be notified prior to commencing ground disturbing activities so that one or more members of the Tribe are present when ground disturbance begins.

*Timing/Implementation:* Prior to commencing construction.

*Enforcement/Monitoring:* City of Holtville Planning & Building Department/Viejas Tribe.

#### **CR-2: Discovery of Human Remains**

If evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).

*Timing/Implementation:* During construction.

*Enforcement/Monitoring:* NAHC, Imperial County Coroner, and Imperial County Department of Planning and Development Services.

<b>VI. ENERGY.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Background**

The discussion in this section is based on Melon Properties Residential Project Energy Consumption Analysis (ECORP 2020) (Appendix D). Energy consumption is analyzed due to the potential direct and indirect environmental impacts associated with a project. Such impacts include the depletion of non-renewable resources (oil, natural gas, coal, etc.) during both the

construction and long-term operational phases.

The Imperial Irrigation District (IID) is the sixth largest electrical utility in California serving more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego counties. The IID provides electrical services to the Project and controls more than 1,100 megawatts of energy derived from a diverse resource portfolio that includes its own generation, and long- and short-term power purchases. Located in a region with abundant sunshine, enviable geothermal capacity, wind and other renewable potential, IID has met or exceeded all Renewable Portfolio Standard requirements to date, procuring renewable energy from diverse sources including biomass, biowaste, geothermal, hydroelectric, solar, and wind.

The Southern California Gas Company (SoCalGas) provides natural gas services to Holtville. As the nation's largest natural gas distribution utility, SoCalGas delivers natural gas energy to 21.6 million consumers through 5.9 million meters in more than 500 communities. The SoCalGas service territory encompasses approximately 20,000 square miles throughout Central and Southern California, from Visalia to the Mexican border.

The impact analysis focuses on the four sources of energy that are relevant to the proposed Project: electricity, natural gas, the equipment fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to determine what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed residential land use. Therefore, for the purposes of this analysis, the amount of electricity and natural gas are quantified and compared to that consumed by residential land uses in the respective service provider's service area as a whole (IID's service area for electricity and the SoCalGas service area for natural gas). The amount of fuel necessary for Project construction and operations is calculated and compared to that consumed in Imperial County.

## VI. Energy Discussion

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

Energy consumption associated with the proposed Project is summarized in Table ENG-1.

<b>TABLE ENG-1 MELON PROPERTIES RESIDENTIAL ENERGY CONSUMPTION</b>		
<b>Energy Type</b>	<b>Annual Energy Consumption</b>	<b>Percentage Increase Countywide</b>
Electricity Consumption <sup>1</sup>	729,398 kWh	0.040 percent
Natural Gas Consumption <sup>1</sup>	23,429 therms	0.001 percent
Automotive Fuel Consumption		
• Project Construction <sup>2</sup>	37,537 gallons	0.018 percent
• Project Operations <sup>3</sup>	139,795 gallons	0.070 percent

Source: <sup>1</sup>OB-1 Air Analysis; <sup>2</sup>Climate Registry 2016; <sup>3</sup>EMFAC2017 (CARB 2017)

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*Notes: The Project increases in electricity and natural gas consumption are compared with all of the residential buildings in the respective service provider's service area in 2018, the latest data available. The Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2019, the most recent full year of data.*

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### **Electricity Use**

As shown in Table ENG-1, the increase in electricity usage as a result of the Project would constitute an approximate 0.04 percent increase in the typical annual electricity consumption attributable to residential uses in the IID service area. However, this is a conservative estimate. The 2019 California Energy Code was adopted by the California Energy Commission (CEC) on May 9, 2018 and applies to projects constructed after January 1, 2020, such as the proposed Project. The 2019 Code is designed to move the state closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install solar photovoltaic panels sized to offset all electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)4). The Code is enforced through the local plan check and building permit processes.

As shown, Project increases in natural gas usage across the SoCalGas service area (0.0001) would also be negligible.

According to IID, the Imperial Valley potentially contains 42,283 megawatts of renewable energy capacity (ECORP 2020, p. 6). In order to further facilitate a divestment in nonrenewable fossil fuel sources of energy in favor of renewable energy sources, IID is investing in new and innovative technologies in the energy industry as it works to develop a 20-megawatt (MW) hour battery energy storage system that will provide operational support across the balancing authority. The system will provide grid flexibility and increase reliability on the IID network by facilitating solar energy integration. Additionally, as a component of the Salton Sea Restoration and Renewable Energy Initiative, IID is planning on the development of up to 1,700 MWs of new geothermal energy at the Salton Sea, which equates to enough energy to power more than one million homes. According to IID, there is more geothermal generating capacity in the Imperial Valley than anywhere else in the U.S. (ECORP 2020, p. 6). Geothermal energy resources provide a steady, reliable source of energy to the state electricity grid that is not subject to weather or seasonal fluctuations.

The California Independent System Operator (CAISO) manages the flow of electricity across the high-voltage, long-distance power lines (high-voltage transmissions system) that make up 80 percent of California's and a small part of Nevada's grid. This non-profit public benefit corporation keeps power moving to and throughout California by operating a competitive wholesale electricity market, designed to promote a broad range of resources at lower prices, and managing the reliability of the electrical transmission grid. In managing the grid, CAISO centrally dispatches generation and coordinates the movement of wholesale electricity in California. As the only independent grid operator in the western U.S., CAISO grants equal access to 26,000 circuit miles of transmission lines and coordinates competing and diverse energy resources into the grid where it is distributed to consumers. Every five minutes, CAISO forecasts electrical demand and dispatches the lowest cost generator to meet demand while ensuring enough transmission capacity for

delivery of power.

CAISO conducts an annual transmission planning process that uses engineering tools to identify any grid expansions necessary to maintain reliability, lower costs, or meet future infrastructure needs based on public policies. CAISO engineers design, run, and analyze complex formulas and models that simulate grid use under wide-ranging scenarios, such as high-demand days coupled with wildfires. This process includes evaluating power plant proposals submitted for study into the interconnection queue to determine viability and impact to the grid. The long-term comprehensive transmission plan, completed every 15 months, maps future growth in electricity demand and the need to meet state energy and environmental goals that require the CAISO grid to connect to renewable-rich, but remote areas of the western landscape. CAISO promotes energy efficiency through resource sharing. CAISO electricity distribution management strategy designed so that an area with surplus electricity can benefit by sharing megawatts with another region via the open market. This allows the dispatch of electricity as efficiently as possible. By maximizing megawatts as the demand for electricity increases, CAISO helps keep electricity flowing during peak periods (ECORP 2020, p. 7).

For these reasons, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

### ***Gasoline Consumption***

As further indicated in Table ENG-1, the Project's gasoline fuel consumption during the one-time construction period is estimated to be 37,537 gallons of fuel, which would increase the annual gasoline fuel use in the county by 0.018 percent. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would conserve the use of their supplies to minimize costs to their profits. Additionally, construction equipment fleet turnover and increasingly stringent State and federal regulations on engine efficiency combined with State regulations limiting engine idling times and require recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature (ECORP 2020, p. 7).

As indicated in Table ENG-1, Project operation is estimated to consume approximately 139,795 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.07 percent. The amount of operational fuel use was estimated using CARB's EMFAC2017 computer program, which provides projections for typical daily fuel usage in Imperial County. This analysis conservatively assumes that all automobile trips projected to arrive at the Project during operations would be new to Imperial County. The Project would not result in any unusual characteristics that would result in excessive long-term operational automotive fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient,

wasteful, or unnecessary in comparison to other similar developments in the region. For these reasons, this impact would be less than significant (ECORP 2020, p. 7).

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.**

The energy consumption of new residential and non-residential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The 2019 California Energy Code was adopted by the CEC on May 9, 2018 and applies to projects constructed after January 1, 2020, such as the proposed Project. The 2019 Code is designed to move the state closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install solar photovoltaic panels sized to offset all the electricity needs of each residential unit (California Code of Regulations [CCR], Title 24, Part 6, Section 150.1(c)4). The Code is enforced through the local plan check and building permit processes. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

The Project would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. IID currently purchases 29 percent of its electricity from renewable energy sources (biomass, geothermal, hydroelectric, and solar), according to the CEC (2019), and is projected to increase this percentage to 33 by the end of the year 2020 (IID 2020). IID continues to locate new renewable energy sources in order to achieve the statewide mandated goal of providing 60 percent of all energy from renewable energy resources by the year 2030 per the Renewable Portfolio Standard (RPS) program. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

<b>VII. GEOLOGY AND SOILS.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong Seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Background:**

A Preliminary Geotechnical Report was prepared for the Project site (LandMark 2018) to determine if there are any soil, geologic or soil hazards present (Appendix E). The Project site is within in the Imperial Valley portion of the Salton Trough physiographic province. The Salton Trough is a topographic and geologic structural depression resulting from large-scale regional faulting. The trough is bounded on the northeast by the San Andreas Fault and Chocolate Mountains and the southwest by the Peninsular Range and faults of the San Jacinto Fault Zone. The Salton Trough represents the northward extension of the Gulf of California, containing both marine and non-marine sediments since the Miocene Epoch. Tectonic activity that formed the trough continues at a high rate as evidenced by deformed young sedimentary deposits and high levels of seismicity (LandMark 2018, p. 2).

The Imperial Valley is directly underlain by lacustrine deposits consisting of interbedded lenticular and tabular silt, sand, and clay. Based on Unified Soil Classification System, the permeability of

these soils is expected to be low to moderate. The Late Pleistocene to Holocene lake deposits are probably less than 100 feet thick and derived from periodic flooding of the Colorado River which intermittently formed a freshwater lake (Lake Cahuilla) (LandMark 2018, p. 2).

## VII. Geology and Soils Impact Discussion:

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

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

**Less than Significant Impact.** Review of the current Alquist-Priolo Earthquake Fault Zone maps indicates that the nearest mapped Earthquake Fault Zone is the Rico Fault located approximately 0.8 miles southwest of the Project site and the Imperial Fault located approximately 2.9 miles west of the Project site. The Rico Fault was first recorded after ground fractures were discontinuously traced along a one-kilometer line. The Rico Fault has been interpreted from limited data to be a north-south trending, buried, pre-existing normal fault (down to the west) (LandMark 2018, p. 5). Thus, impacts associated with a known earthquake fault are considered less than significant.

#### ii) **Strong Seismic ground shaking?**

**Less than Significant Impact.** The primary seismic hazard at the Project site is the potential for strong ground shaking during earthquakes along the Superstition Hills, Imperial, Cerro Prieto, and Laguna Salada Faults (LandMark 2018, p. 5). The Project site is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The Project is required to be designed and constructed in accordance with the 2019 California Building Code and ASCE 7-10 Seismic Parameters. Compliance with these requirements is considered building design for strong seismic ground shaking. Therefore, impacts resulting from strong seismic ground shaking are considered less than significant.

#### iii) **Seismic-related ground failure, including liquefaction?**

**Potentially Significant Impact Unless Mitigation is Incorporated.** Liquefaction is a potential design consideration because of possible saturated sand substrata underlying the site. Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. With strong groundshaking, an increase in pore water pressure develops as the soil tends to reduce in volume. If the increasing pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases and the soil behaves as a liquid (similar to quicksand) (LandMark 2018, p. 3). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations.

Four conditions are generally required for liquefaction to occur:

- 1) The soil must be saturated (relatively shallow groundwater);
- 2) The soil must be loosely packed (low to medium relative density);

- 3) The soil must be relatively cohesionless (not clayey); and
- 4) Groundshaking of sufficient intensity must occur to function as a trigger mechanism.

All of these conditions may exist to some degree at the site. Therefore, impacts associated with liquefaction are considered potentially significant unless mitigation is incorporated.

### **Mitigation Measure**

#### **GEO-1: Reduce Liquefaction**

Subsurface exploration and evaluation of the subsurface soils shall be required to determine the potential for, and magnitude of, liquefaction induced settlements at the Project site.

Ground improvement methods available to mitigate liquefaction include deep soil mixing (cement), vibro-compaction, vibro-replacement, geo-piers, stone columns, compaction grouting, or deep dynamic compaction.

Other means to mitigate liquefaction damage include either a deep foundation system, rigid mat foundations and grade-beam reinforced foundations that can withstand some differential movement or tilting.

*Timing/Implementation: Prior to approval of final building plans; as part of Project design/Prior to issuance of building permits.*

*Enforcement/Monitoring: City of Holtville Building Department.*

#### **iv) Landslides?**

**No Impact.** No ancient landslides are shown on geologic maps of the region and no indications of landslides were observed during the site investigation. The hazard of landslide is unlikely due to the relatively planar topography of the Project site (LandMark 2018, p. 3). No impact would occur.

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

**Less than Significant Impact.** The soils within the boundaries of the Project site are primarily Imperial Glenbar Silty Clay, Wet, 0 to 2 percent slopes with a very small area in the southeast corner consisting of Vint and Indio very fine sandy loams, wet. The Project site is currently compacted soil. Both Imperial Glenbar soils and Vint and Indio soils have a slight erosion hazard (Imperial County 1980, pp. 19 & 38). During construction, erosion would be controlled in accordance with County standards including preparation, review and approval of a grading plan by the County Engineer; implementation of a Dust Control Plan (Rule 801) and mitigation measures AQ-1 and AQ-2.

#### **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?**

**Potentially Significant Impact Unless Mitigation is Incorporated.** As previously noted, the hazard of landslide is unlikely due to the relatively flat topography of the site. However, the potential for lateral spreading as a result of liquefaction is present as discussed under item iii) above. In general, much of the near surface soils within the Project site consist of silty clays having a moderate expansion potential. The site is predominantly underlain by

clays that are not expected to collapse with the addition of water to the site. Therefore, the risk of hydro-collapse is considered very low (LandMark 2018, p. 7). Regional subsidence due to the geothermal resource activities has not been documented in the area of the Project site; thus, the risk of regional subsidence is considered low (LandMark 2018, p. 7). While development of the Project site would be subject to landslides and potential for subsidence or collapse is low, potential for liquefaction could produce lateral spreading. This is considered a potentially significant impact unless mitigation is incorporated.

### **Mitigation Measure**

#### **GEO-2: Conduct Site-Specific Geotechnical Investigation**

A site-specific Geotechnical Investigation shall be conducted prior to site development to provide geotechnical criteria for the design and construction of this project.

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

*Enforcement/Monitoring: City of Holtville Building Department.*

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

**Potentially Significant Impact Unless Mitigation is Incorporated.** In general, much of the near surface soils within the Project site consist of silty clays having a moderate expansion potential (LandMark 2018, p. 3). According to the Imperial County Soil Survey (1980), Imperial soil is used extensively for homesites despite the limitation of high clay content. House slabs need extra strength to withstand the stresses of shrinking and swelling and to compensate for the soil's low bearing strength (Imperial County 1980, p. 18). Without proper engineering incorporated as mitigation, impacts resulting from expansive soil on life or property are considered potentially significant.

### **Mitigation Measure**

#### **Implement Mitigation Measure GEO-2.**

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

**No Impact.** The proposed Project does not require septic tanks or an alternative wastewater disposal system. The Project will connect to an existing 12-inch sewer line located in Melon Road on the west side of the Project. No impact would occur.

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

**Potentially Significant Impact Unless Mitigation Incorporated.** The Project site has been previously disturbed and disked in association with past agricultural activities. Excavation and trenching would be necessary in association with construction of the retention basin in the southwest corner of the site, the realigned Pear Canal, and along the alignment of the proposed force main drainpipe (approximately 3 feet). While no unique geologic features are present, the potential exists for previously unknown paleontological resources to be present beneath which may be unearthed during excavation and trenching. This is considered a potentially significant impact unless mitigation is incorporated.

**Mitigation Measure****GEO-3: Paleontological Monitoring during Construction**

Due to the significant disturbance from past agricultural activities, paleontological monitoring shall take place during construction when ground disturbance is at a depth of 5 feet and deeper. If paleontological sensitive soils (as defined per the Society of Vertebrate Paleontology) or paleontological resources (per significance criteria of the San Bernardino County Museum) are encountered, monitoring shall be increased to full-time within a radius of 100 meters of the location of the find. Full-time monitoring may become necessary if the earth-moving operations continuously impact undisturbed paleontologically sensitive soils. A program to mitigate impacts on paleontological resources that are exposed shall be developed and implemented.

*Timing/Implementation: During construction of the initial 10% of total solar field grading activities and possibly longer, depending on findings.*

*Enforcement/Monitoring: Applicant and City of Holtville Planning and Building Department and Services Department.*

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

**Background:**

The analysis of Greenhouse Gases in this section is based on the Air Quality & Greenhouse Gas Impact Analysis Melon Properties, LLC. (OB-1 2020) (Appendix A).

Constituent gases that trap heat in the Earth's atmosphere are called greenhouse gases (GHGs). The most important GHGs directly emitted by humans include carbon dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>), Nitrous Oxide (N<sub>2</sub>O), Fluorinated gases, and several others.

Global Warming Potential (GWP) is the potential of a gas or aerosol to trap heat in the atmosphere. Individual GHG compounds have varying GWP and atmospheric lifetimes. The reference gas for the GWP is CO<sub>2</sub>; CO<sub>2</sub> has a GWP of one. The calculation of the CO<sub>2</sub> equivalent (CO<sub>2</sub>e) is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent metric. A CO<sub>2</sub>e is the mass emissions of an individual GHG multiplied by its GWP. GHGs are often presented in units called tonnes (t) (i.e. metric tons) of CO<sub>2</sub>e (tCO<sub>2</sub>e).

Even though climate change is a global problem and GHGs are global pollutants, the specific potential effects of climate change on California have been studied. Projected changes for the remainder of this century in California include warmer temperatures, less rain and increase wildfire risk (OB-1 2020, p. 10).

In 2006, the California State Legislature enacted the California Global Warming Solutions Act of 2006, also known as AB 32. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In response to AB 52, CARB released the Climate Change Scoping Plan in 2008 outlining the state's strategy to reduce GHGs. According to the Scoping Plan, the 2020 target of 427 MtCO<sub>2</sub>e requires the reduction of 169 MtCO<sub>2</sub>e, or approximately 28.3 percent, from the State's projected 2020 Business as Usual (BAU) emissions level of 596 MtCO<sub>2</sub>e.

The proposed Project is the construction and occupation of 152 multi-family units. During construction, temporary greenhouse gases (GHG) will be generated by heavy equipment operation, employee vehicles and diesel trucks. Once occupied, vehicle trips by Project residents will generate GHGs. The analysis below is based on the Air Quality Impact Analysis prepared for the Project (OB-1 2020).

### VIII. Greenhouse Gas Emissions Discussion

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

**Less than Significant Impact.** As discussed in Section 15064.4 of the CEQA Regulations, the determination of the significance of GHG emissions requires careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project.

The main source of GHG emissions generated by the Project include combustion of fossil fuels in mobile sources during the construction and operation. Additionally, CalEEMod estimates emissions from area sources, such as landscaping and hearths; energy uses, such as electricity and natural gas; and emissions associated with the supplying and treating the water and wastewater. Emissions of GHG were calculated using the CalEEMod model. Estimated GHG emissions are summarized in Table GHG-1. CalEEMod outputs are presented in Appendix A.

**TABLE GHG-1  
TOTAL GHG EMISSIONS**

<b>Category</b>	<b>CO<sub>2</sub>e (tonnes/year)</b>
Direct – Mobile (Amortized Construction)	12.68
Direct – Mobile (Operational)	1,024.83
Direct – Area Source	1.89
Indirect – Purchased Electricity (Power)	125.74
Indirect – Purchased Natural Gas (Power)	421.31
Indirect – Purchased Electricity (Water)	128.03
Direct – Fugitive – Solid Waste	35.16
<b>Total</b>	<b>1,749.60</b>

Source: OB-1 2020, p. 32.

However, since the County of Imperial has not established a threshold of significance for GHGs, the ICAPCD recommends that the project be evaluated based on strategies developed by the CAT. In a 2006 Report, the CAT set the framework for the State's

emission reduction strategies that could be implemented in California to reduce climate change emissions to ensure that the targets of AB-32 are met.

Table GHG-2 presents Project's design and/or mitigation that demonstrates compliance with State GHG strategies presented in the Climate Action Team (CAT) report.

**TABLE GHG-2**  
**CALIFORNIA GREENHOUSE GAS EMISSION-REDUCTION STRATEGIES**

Strategy	Project Design/Mitigation to Comply with Strategy
<b>Vehicle Climate Change Standards:</b> AB 1493 (Pavley) required the State to develop and adopt regulations to achieve the most feasible and cost-effective reduction in climate change emissions emitted by passenger vehicles and light-duty trucks. Regulations were adopted by CARB in September 2004.	These are CARB-enforced standards; vehicles that would access the proposed project that are required to comply with the standards would comply.
<b>Other Light-duty Vehicle Technology:</b> New standards would be adopted and phased in beginning in the 2017 model year.	
<b>Heavy-duty Vehicle Emission Reduction Measures:</b> Increased efficiency in the design of heavy-duty vehicles and an educational program for the heavy-duty vehicle sector.	
<b>Diesel Anti-Idling:</b> In July 2004, CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	The proposed project would be subject to State law.
<b>Hydrofluorocarbon Reduction:</b> 1) ban retail sale of HFC in small cans, 2) require that only low-GWP refrigerants be used in new vehicular systems, 3) adopt specifications for new commercial refrigeration, 4) add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs, 5) enforce Federal ban on releasing HFCs.	This measure applies to consumer products. As CARB adopts regulations for these reduction measures, any products that the regulations apply to would comply with the measures.
<b>Transportation Refrigeration Units, Off-road Electrification, Port Electrification:</b> Strategies to reduce emissions from TRUs, increase off-road electrification, and increase use of shore-side/port electrification.	Not applicable.
<b>Manure Management:</b> The proposed San Joaquin Valley Rule 4570 would reduce volatile organic compounds from confined animal facilities through implementation of control options.	Not applicable.
<b>Alternative Fuels – Biodiesel Blends:</b> CARB would develop regulations to require the use of 1% to 4% biodiesel displacement in California diesel fuel.	Not applicable.
<b>Alternative Fuels – Ethanol:</b> Increased use of ethanol fuel.	Not applicable.
<b>Achieve 50% Statewide Recycling Goal:</b> Achieving the State's 50% waste diversion mandate, as established by the Integrated Waste Management Act of 1989 (AB 939 [Sher]), Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy-intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	The proposed project would comply with the 1989 California Integrated Waste Management Act and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended.

Strategy	Project Design/Mitigation to Comply with Strategy
<b>Zero Waste – High Recycling:</b> Additional recycling beyond the State's 50% recycling goal.	The proposed project would comply with the 1989 California Integrated Waste Management Act and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended.
<b>Landfill Methane Capture:</b> Implement direct gas use or electricity projects at landfills to capture and use emitted methane.	Not applicable.
<b>Urban Forestry:</b> A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	The proposed project would be subject to landscaping standards as specified in the Imperial County Landscaping Code (Div 3, Ch 2).
<b>Afforestation/Reforestation Projects:</b> Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	Not applicable. The proposed project area has not been forested in recent times.
<b>Water Use Efficiency:</b> 19% of all electricity, 30% of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute, and use water and wastewater. Increasing the efficiency of water transport and reducing water usage would reduce GHG emissions.	The proposed project would be required to comply with the water efficiency standards within the 2013 California Green Building Code (CalGreen).
<b>Building Energy Efficiency Standards in Place and in Progress:</b> Public Resources Code 25402 authorizes the California Energy Commission (CEC) to adopt and periodically update its building energy efficiency standards, which apply to newly constructed buildings and additions and alterations to existing buildings.	The proposed project would be consistent with State law.
<b>Appliance Energy Efficiency Standards in Place and in Progress:</b> Public Resources Code 25402 authorizes CEC to adopt and periodically update its appliance energy efficiency standards, which apply to equipment and devices that use energy and are sold or offered for sale in California.	The proposed project would be consistent with State law.
<b>Cement Manufacturing:</b> Cost-effective actions to reduce energy consumption and lower carbon dioxide emissions in the cement industry.	Not applicable.

Strategy	Project Design/Mitigation to Comply with Strategy
<p><b>Smart Land Use and Intelligent Transportation Systems (ITS):</b> Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.</p> <p>It is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and services.</p> <p>Governor's office is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through State investments, incentives, and technical assistance, land use and technology strategies that provide for a prosperous economy, social equity, and a quality environment.</p> <p>Smart land use, demand management, ITS, and value pricing are critical elements for improving mobility and transportation efficiency. Specific strategies include promoting jobs/housing proximity and transit-oriented development, encouraging high-density residential/commercial development along transit/rail corridors, value and congestion pricing, ITS, traveler information/traffic control, incident management, accelerating the development of broadband infrastructure, and comprehensive, integrated, multimodal/intermodal transportation planning.</p>	Not applicable.
<p><b>Enteric Fermentation:</b> Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.</p>	Not applicable.
<p><b>Green Buildings Initiative:</b> Green Building Executive Order S-20-04 sets a goal of reducing energy use in public and private buildings by 20% by 2015 compared with 2003 levels. Consistent with mitigation.</p>	The proposed project would be required to comply with the CalGreen energy efficiency standards.
<p><b>California Solar Initiative:</b> Installation of 1 million solar roofs on homes and businesses, or an equivalent 3,000 megawatts, by 2017; increased use of solar thermal systems to offset the increasing demand for natural gas; use of advanced metering in solar applications; and the creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.</p>	Not applicable.

With implementation of the design and mitigation identified in Table GHG-2, either direct or indirect Project generated GHG emissions would be considered less than significant.

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

**Less than Significant Impact.** Neither the County of Imperial or ICAPCD have any specific plans, policies, nor regulations adopted for reducing the emissions of GHGs. However, since the long-term, operational GHG emissions are not cumulatively considerable and the construction emissions are short-term, the Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. This impact is considered less than significant.

<b>IX. HAZARDS AND HAZARDOUS MATERIALS.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitos, rats or flies, which are capable of transmitting significant public health diseases or nuisances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Background:**

The discussion and analysis in this section is based on a Phase I Environmental Assessment (ESA) prepared for the Project site (GS Lyon 2019) (Appendix F). The proposed Project site was historically an agricultural field with a home in the southwest and southeast corners. Based on a review of aerial maps, the site was used for agriculture starting prior to 1937 and ending sometime between 1965 and 1975. The house in the southwest corner was removed sometime between 1965 and 1976 and the residence in the southeast corner was removed between 2008 and 2012. The site is currently vacant, undeveloped land located at the northeast corner of Melon Road and 9th Street. A telephone line extends along the west side of the Project site. A power pole in the southwest corner of the Project site has an electrical transformer. An artesian water well is located in the northwest corner of the subject property. The well has a sampling

apparatus within a metal box. Land uses in the area include low density and rural residential developments. No heavy industrial or agricultural uses are near the site nor are there any chemical plants nearby (GS Lyon 2019, p. 18).

The Phase I ESA included the findings of a records review of multiple regulatory databases; examined historic uses of the property and surrounding areas; provided the results of a site reconnaissance; documented interviews with the property owner and others familiar with the site. The Phase I ESA was used in responding to the items in the checklist below.

## **IX. Hazards and Hazardous Materials Discussion**

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

**Less than Significant Impact.** During construction, the proposed project would involve the transport, use, and/or disposal of hazardous material (e.g. diesel, oil, etc.). Contractors are required to implement Best Management Practices (BMPs) and a Hazardous Materials Management Plan (HMBP). Based on the requirements regarding transport, use and disposal of hazardous materials, impacts are considered less than significant.

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

**Less than Significant Impact.** The site is not located in proximity to any known hazardous materials (methane gas, tar seeps, hydrogen sulfide gas), and the risk of hazardous materials is considered very low. The subject property is in Zone 3 as shown on the EPA Map of Radon Zones indicating a predicted average indoor radon screening level of less than 2 pCi/L; therefore, no further action is required. Radon gas is not believed to be a potential hazard at the subject property (GS Lyon 2019, p. 21). Based a review of environmental records, historical documents, and site reconnaissance, the property has been in agricultural use and/or vacant since the 1930s. Residues of currently available pesticides and currently banned pesticides such as DDT/DDE may be present in near surface soils in limited concentrations. The concentrations of these pesticides found on other Imperial Valley agricultural sites are typically less than 25% of the current regulatory threshold limits and, at those levels, are not considered a significant environmental hazard. Pole-mounted sealed electrical transformers owned and maintained by the Imperial Irrigation District (IID) are located on southwest corner of the subject property. In recent years, the IID has replaced all transformers that contained PCB's. No leaks were noted during the site reconnaissance. The Phase I ESA concluded that there is no evidence of *recognized environmental conditions* in association with the Project site. Therefore, creation of a significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment is considered to result in a less than significant impact.

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

**Less than Significant Impact.** The Project site is located within one-quarter mile of Sam

Webb High School which is adjacent to West 8<sup>th</sup> Street and Holtville High School which is north of East 7<sup>th</sup> Street. Both schools are between Melon Road on the west and Olive Avenue on the east. Limited quantities of hazardous materials may be handled during construction activities (i.e. gasoline, diesel), however no acutely hazardous materials are anticipated to be used. As explained under item a), above, BMPs would be implemented and an HMBP would be in place. Because BMPs and an HBMP are required, impacts associated with handling hazardous waste within one-quarter mile of a school are considered less than significant.

**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.** A search of DTSC's EnviroStor website for Imperial County did not identify the Project site as a hazardous materials site (EnviroStor 2019). The Phase I ESA also included searches of several databases for hazards within various radius distances of the site. The findings are summarized below.

List	Distance	Finding
<b>Federal NPL List</b>	1 mile	No sites
<b>Federal CERCLIS List</b>	0.5 mile	No Sites
<b>Federal CERCLIS – No Further Remedial Action Planned</b>	0.5 mile	No Sites
<b>Federal RCRA List</b>	0.5 mile	One (1) RCRA generator facility was identified within ¼ mile of the subject property. This risk site is listed as the Holtville High School located at 755 Olive Avenue, approximately 1,400 feet south of the subject property. No violations were found for this risk site.
<b>Federal ERNS List</b>	N/A	None
<b>State and Tribal NPL List</b>	1 mile	None
<b>State and Tribal Underground Storage Tank Sites</b>	0.5 mile	Three sites. Each site has been reviewed by the governing agency and the cases have been closed.
<b>State and Tribal Underground and Aboveground Storage Tank Sites</b>	0.25 mile	Two (2) AST sites were identified within ¼ mile of the subject property. The two AST sites are both at the Imperial County Road Department located at 1744 Underwood Road, approximately 800 feet northeast of the subject site.
<b>Solid Waste Disposal/Landfill Facilities</b>	0.5 mile	None.
<b>Unmapped (Orphan) Sites</b>	Over 5 miles	Two orphan sites listed. No risk based on distance.

List	Distance	Finding
Department of Toxic Substances Control Records	0.5	None.
California State Water Resources Control Board Records	0.5	One site approximately 1,600 feet east of the project site. The site has been reviewed by the governing agency and the case closed.

GS Lyon 2019, p. 10-14.

As shown, in the table, no hazardous materials were identified on or near the Project site. No impact is identified for this issue area.

- 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?**

**No Impact.** The Project site is not located within two miles of a public airport or a private airstrip. The Douthitt Field in El Centro is approximately 8.5 miles to the west and slightly south of the Project site. Although no longer active, Holtville Airport is located approximately 6.29 north-northeast of the Project site. The Project site is not within an airport land use plan or within two miles of a public airport or public use airport and would not result in a safety hazard or excessive noise for people working at the Project site in the short-term or residing in the multi-family units in the long-term. Thus, no impact is identified for these issue areas.

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

**Less than Significant Impact.** The project abuts 9th Street which is an emergency evacuation route to SR 115. Access along 9th Street will be maintained throughout construction to avoid interfering with emergency response and/or evacuation. A Traffic Control Plan will be required by the City to ensure that traffic flow continues with no closures of 9th Street. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans.

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

**Less than Significant Impact.** Fire protection and emergency medical services in the area are provided by the Holtville Fire Department. As noted during site reconnaissance, the Project site is located within a rural residential area which abuts city residential lots in of northwestern Holtville. The Project site is vacant with some scattered brush and weeds covering the site. California. Adjacent properties consist of semi-rural residential homes to the east, north and west. City residential lots exist to the south. An agricultural field is located to the northwest. According to the Draft Fire Hazard Severity Zones in the Local Responsibility Area Map prepared by the California Department of Forestry and Fire Protection in 2007, the Project site is designated to as a Low Fire Hazard Severity Zone (CDF 2007). Therefore, the potential to expose people or structures to significant risk of loss, injury of death involving wildland fires is considered less than significant.

- h) **Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitos, rats or flies, which are capable of transmitting significant public health diseases or nuisances?**

**Potentially Significant Impact Unless Proper Mitigation is Incorporated.** The intersection of Melon Road and 9<sup>th</sup> Street is known to flood during storm events. The Project includes an on-site retention basin that will capture on-site stormwater prior to conveying flows offsite to an ultimate discharge point. After a 100-year storm event, the retention basin should empty within 72 hours. If the basin does not empty within this timeframe, standing water conditions may expose residents to vectors, including mosquitos. This is considered a potentially significant impact unless mitigation is incorporated.

**Mitigation Measure**

**HAZ-1: Mosquito Abatement Plan**

The Project owner shall prepare and submit a Mosquito Abatement Plan to the Imperial County Environmental Health Services Department (ICEHSD). The Plan must be approved by the ICEHSD and implemented by the project owner following a 100-year storm event/when the basin fails to drain within 72-hours.

*Timing/Implementation:* Following a 100-year storm event/when the basin fails to drain within 72-hours/Project owner.

*Enforcement/Monitoring:* ICEHSD/City of Holtville Planning and Building Department.

<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the Project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>X. HYDROLOGY AND WATER QUALITY. Would the Project:</b>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Background

This section is based on the Preliminary Drainage Study prepared for the Project (DD&E 2019) (Appendix G). The majority of the city's stormwater currently surface flows onto an open-channel ditch at the southeast corner of Melon Avenue and 9th Street before connecting to an undersized stormwater pipeline that transitions into a deficient tile lined channel. The pipeline and channel are on private property. The stormwater is ultimately discharged onto the Alamo River. Due to the undersized pipeline and deficient tile lined channel, stormwater pools along the open-channel ditch and flooding occurs at the southeast corner of Melon Avenue and 9th Street and at downstream private properties.

The proposed Project site is bordered by the Pear Canal, a raw water channel owned by the Imperial Irrigation District (IID). The Pear Canal will be undergrounded either in its existing alignment or shifted 5 to 10 feet to the north within the IID right-of-way. Construction of the undergrounded canal will be undertaken by IID and is anticipated to occur concurrent with construction of the Project (DuBose pers. comm., 2020).

An artesian water well is located in the northwest corner of Project site. The well has a sampling apparatus within a metal box (GS Lyon 2019, p. 5).

A Preliminary Drainage Study was prepared for the Melon Apartments Project (DD&E 2019) to document existing conditions, calculate stormwater runoff and determine retention basin storage volume. The Project site is graded and generally slopes from east to west at slope percentage rates between 0.10% to 0.20% and south to north at slope percentage rates between 0.01% to 0.20%. The site's flat topography allows for the irrigation water to move slowly and promote absorption into the existing clay soils (DD&E 2019, p. 7).

A private tail water ditch along the western edge of the Project site receives drainage water from the site. The ditch extends north and ultimately discharges into the Palmetto Drain. Elevated roads surround the northern, southern and western boundaries of the site. In addition, the Pear Canal is adjacent to the southern site boundary (DD&E 2019, p. 7).

### X. Hydrology and Water Quality Discussion:

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

**Less than Significant Impact.** In order to control storm runoff, a retention basin is proposed in the southwest corner of the Project site. The retention basin is proposed at this location due to the site's topographic nature sloping from east to west. The retention basin is designed to retain the on-site stormwater and will be discharged to

a City-approved drain outlet or will drain by percolation (DD&E 2019, p. 6). The groundwater in the vicinity of the subject property is brackish and is encountered at a depth of 8 to 12 feet below the ground surface. Depth to groundwater may fluctuate due to localized geologic conditions, precipitation, irrigation, drainage and construction practices in the region. Based on the regional topography, groundwater flow is assumed to be generally towards the southwest within the Project area. Flow directions may also vary locally in the vicinity of the site (LandMark 2019, p. 6). The site is not located within an area with a groundwater basin or sole source aquifer. No impact to degrading surface or groundwater quality would occur. Therefore, a less than significant impact relative to degrading surface or groundwater quality.

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

**No Impact.** As noted in item a), above, groundwater in area of the Project site is brackish and typically encountered at a depth of between 10 to 15 feet below ground surface. Water from the retention basin may be discharged to a City approved drain outlet or will drain by percolation (DD&E 2019, p. 6). If the water percolates, it would assist with recharge of groundwater. An artesian water well is located in the northwest corner of Project site. The well has a sampling apparatus within a metal box (GS Lyon 2019, p. 5). The artesian well, however, does not support any uses (existing or planned) under any permits, nor is it anticipated that the Project would affect the well, ground water supplies, or interfere with groundwater recharge (City of Holtville 2018). The proposed Project would not rely on groundwater for potable and landscape uses. The City receives its water supplies from the IID which holds large and senior rights to the Colorado River. Therefore, no impact would occur in association with decreasing groundwater supplies or interfering with groundwater recharge.

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

**Result in a substantial erosion or siltation on- or off-site.**

**i) No Impact.** The Project site is currently vacant land with no pavement or sidewalks. Development of the proposed Project would involve grading the site (approximately 8.19 acres) which could result in soil erosion during a rain event. This would be addressed through the requirement of a National Pollution Discharge Eliminate Permit (NPDES) and the use of Best Management Practices. Once the project is constructed, the site would become largely impermeable with the introduction of pavement and multi-family apartments. These features which will alter the current drainage patterns and runoff flow rates of the site. However, the alterations will not result in erosion or siltation on-site or off-site as the site soils would not be exposed and infrastructure would be in place (e.g. a retention basin) to capture runoff and prevent transport of any on-site flows off-site. Therefore, the proposed Project would not result in substantial erosion or siltation on-or off-site.

**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.** According to the Preliminary Drainage Study for the Project, drainage will flow to the southwest corner of the site where a stormwater retention basin is proposed. All on-site storm water contributions will be managed within the limits of the Project site and will be directed to the proposed retention basin (via surface runoff or through a conveyance system). The retention basin will drain to the City of Holtville Drainage Swale that extends south along the east side of Melon Avenue beginning at the southeast corner of Melon Avenue and 9th through a new 3-inch diameter force-main drain pipe proposed at the southwest corner of the retention basin to an alternate drain connection shown on the Drainage Plan (See Exhibit C and D) (DD&E 2019, p. 7). Connections to existing City of Holtville drainage facilities will be done according to the City's standards and in accordance with the conditions of the Encroachment Permit. The Pear Canal will be undergrounded either in its existing alignment or shifted 5 to 10 feet to the north within the IID right-of-way. IID will be responsible for undergrounding the canal (DuBose pers. comm., 2020). No storm water contributions will be disposed of into any County Public Right-of-Way.

The Preliminary Drainage Study for the Project was based on on-site volumes and included the amount of stormwater generated by the 100-year storm (3 inches of rain in 24 hours). The drainage analysis also assumed that 100% of the 100-year storm will be retained on site (DD&E 2019, p. 7). Based on these assumptions, the Project would require 2.05 acre-feet (ac-ft) of storage. The amount of storage provided by the approximately 0.75-acre detention basin is 2.44 ac-ft. This exceeds the volume required (2.05 ac-ft). After a 100-year storm event, the retention basin should empty within 72 hours. If the basin does not drain within this timeframe, the owner should provide a Mosquito Abatement Plan to the satisfaction of the County Environmental Health Services Department (see Mitigation Measure HAZ-1).

Off-site storm water may pond up against the elevated roads on the northern, southern and western boundaries of the site and along the 9<sup>th</sup> Street Lateral adjacent to the southern site boundary (DD&E 2019, p. 7). However, because the off-site flow patterns will be maintained, the off-site drainage has been determined through field inspections to have minimal or no impacts on the Project site (DD&E 2019, p. 7). On-site volumes would be retained on-site. Therefore, impacts to on- or off-site flooding resulting from the proposed Project are considered less than significant.

**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?**

**Less than Significant Impact.** All on-site storm water contributions will be managed within the limits of the Project site and will be directed to the proposed retention basin (via surface run off or through a conveyance system) then discharging into the City of Holtville Drainage Swale that extends south along the east side of Melon Avenue beginning at the southeast corner of Melon Avenue and 9th Street through a new 3-inch diameter force-main drain pipe proposed at the southwest corner of the retention basin. The developer is working through an Encroachment Permit with the City of

Holtville to discharge flows from the basin to a connection as shown on the Drainage Plan (Refer to Exhibit B and D). No storm water contributions will be disposed of into any County Public Right-of-Way. Thus, the proposed Project will not substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, no impact would occur.

**iv) Impede or redirect flows?**

**No Impact.** The proposed Project would capture stormwater flows on-site and redirect them to an on-site retention basin. As the Project would capture all runoff generated on-site, it would result in no impact with regard to impeding or redirecting surface flows.

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

**No Impact.** The Project site is approximately 26 miles southeast from the Salton Sea which is the nearest large water body. Due to the distance from the Project site, the Salton Sea does not pose a significant danger of inundation from tsunami or seiche related to the Project site. Thus, no impact is identified for these issues.

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

**No Impact.** As discussed under item a), above, all runoff from the Project site will be retained on-site then discharged into City facilities. The proposed Project would have no impact on implementation of a water quality control plan or sustainable groundwater management plan.

<b>XI. LAND USE.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Background:**

The proposed Project is in line with the future vision and path stated in the General Plan to maintain residential opportunities that meet the needs of all residents adding to the diverse housing stock. The project is located at the corner of Melon Road and 9th Street in Holtville near the City of Holtville's Boundary abutting the county line. The proposed project will be comprised of 13 new structures including 11 Multi-Family Building Units that will contain 152 total dwelling units. The project will contain a mix of one-bedroom and two-bedroom units. A 0.34-acre Recreation Center will be centrally located on the Project site. Maintenance and laundry facility buildings will be located at the eastern portion of the proposed project.

## XI. Land Use and Planning Discussion

### a) Physically divide an established community?

**No Impact.** The Project site is within unincorporated Imperial County adjacent to the northern limit of the City of Holtville. Rather than divide an established community, the Project represents an expansion of the existing city limits and would provide additional housing options in a portion of the City currently characterized by low-density and rural residential development. Thus, the proposed Project would have no impact on dividing an established community.

### b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Less than Significant Impact.** The proposed Project site is currently designated Urban Area on the Imperial County General Plan and is zoned R-1-U (Single-Family – Urban) and R-1 (Single-Family Residential). A General Plan Amendment is required to change the land use designation to High Density Residential on the Holtville General Plan. The site must also be annexed and pre-zoned to the R-3 Multi-Family zone in the City of Holtville.

The proposed Project would add an additional 152 dwelling units to the City of Holtville's current housing stock, thus improving the quality of life for those citizens of Holtville who choose to live in the new proposed development. Therefore, upon approval of the Annexation, General Plan Amendment and Pre-zone, the proposed Project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be less than significant.

<b>XII. MINERAL RESOURCES.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Background

The Project site was historically used for agriculture since prior to 1937. According to Figure 6 “Imperial County Existing Mineral Resources” of the Conservation and Open Space Element of the County of Imperial General Plan (County of Imperial 2016), no known mineral resources occur within the Project site nor are there any mapped mineral resources within the city limits of Holtville.

**XII. Mineral Resources Discussion**

- 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.** As noted, the proposed Project would not result in the loss of known mineral resources as none are known to be present on or in the vicinity of the site. Thus, no impact is identified with regard to mineral resources.

- b) **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.** Refer to item a), above.

<b>XIII. NOISE.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Background:**

A Noise Assessment has been prepared for the Project (DD&E 2018) (Appendix H) in order to assess the proposed construction noise levels on five vacant parcels of land that were once agricultural fields located northeast of the intersection between Melon Road and 9th Street. The City of Holtville allows the exclusion of operational noise levels from noise assessments because operational noise levels for this type of proposed Project (i.e. a multi-family development) are normally low and have less than significant effects on nearby residential sites. Information used to prepare this construction noise assessment was obtained from the City of Holtville's General Plan Noise Element, the City of Holtville Zoning Ordinance and Project specific information.

In recent years, development around the proposed Project site has increased and the area is now characterized by rural and low-density residential uses. Undeveloped parcels typically emit little to no noise. Existing noise originating from the Project site has been minimal given that the site is vacant.

The Project proposes to develop the site with 152 multi-family units as well as a recreation area, maintenance building and a retention basin. The Project also includes construction of a 2,370

linear foot 3-inch PVC pipeline connecting to the City of Holtville Drainage System. This assessment strictly addresses the construction activities needed to implement the proposed Project.

### **XIII. Noise Discussion:**

- 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?**

**Potentially Significant Impact Unless Mitigation is Incorporated.** The nearest sensitive receptors which would be subject to construction noise include rural and low-density residential uses approximately 80-100 feet from the Project site and along the proposed pipeline alignment (along Alamo Road and Tamarack Street). During construction, the average hourly noise level would be approximately 80 dBA at 50 feet from the equipment or 73 dBA at 100 feet. While noise levels decrease substantially beyond 50 feet, the City of Holtville's General Plan requires mitigation for noise levels above 60 dBA for residential uses. Therefore, a potentially significant impact unless mitigation is incorporated would occur with regard to a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of the local general plan. As previously noted, the Project's operational noise would not exceed the County of Imperial's and the City of Holtville's Guidelines for Determining Significance as residential uses do not significantly increase ambient levels.

#### **Mitigation Measure**

##### **NOI-1: Noise Reduction Methods**

- Prior to commencing earth-moving and construction activities, the project contractor shall install noise attenuating barriers/acoustic shields along the perimeter of the Project site. The barrier must prevent the "line-of-sight" between the noise source and the receptor.
- Equipment shields shall be used for stationary pieces of equipment (i.e. metal containers) placed near the Project site property line to reduce noise levels. Alternatively, the project contractor shall construct plywood barriers around stationary equipment.
- The Project contractor shall comply with the City of Holtville's Zoning Ordinance which requires construction work or related activity which is adjacent to or across a street or right-of-way from a residential use, except between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, or between 8:00 a.m. and 7:00 p.m. on Saturday and Sunday. No such construction is permitted on federal holidays.
- The project contractor shall turn off equipment when not in use (i.e. not left idling for more than 10 minutes).
- The project contractor shall use equipment that is no older than 10 years old to achieve the lowest levels of noise and air emissions.

*Timing/Implementation:* Prior to and during construction/Project contractor.

*Enforcement/Monitoring:* City of Holtville Planning and Building Department.

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

**No Impact.** Vibration from earth-moving activities and equipment could occur during construction. Per the City of Holtville's Municipal Code, "No use except a temporary construction operation shall be permitted which generates inherent and recurrent ground vibration perceptibly, without instruments, at the boundary of the lot on which the use is located". Only during construction of the proposed Project would vibration be perceived due to grading and truck deliveries. This is allowed under the City of Holtville's Municipal Code. No blasting or other sources of substantial vibration would be permitted. Operational activities associated with the proposed Project would not produce ground-borne vibrations. Therefore, no impact would occur with regard to generation of excessive groundborne vibration or groundborne noise levels.

**c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The Douthitt Strip in El Centro is approximately 8.5 miles to the west and slightly south of the Project site. Although no longer active, Holtville Airport is located approximately 6.29 north-northeast of the Project site. The Project site is not within an airport land use plan or within two miles of a public airport or public use airport and would not result in a safety hazard or excessive noise for people residing or working at the site. Workers involved with construction as well as residents would not be exposed to excessive noise levels from a private airstrip or public use airport. Thus, no impact is identified with regard to exposure to airport noise.

<b>XIV. POPULATION AND HOUSING.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Background:**

The proposed Project is a 152-unit multi-family residential development as well as installation of a force-main drainpipe for an on-site retention basin. Based on data from the United States Census Bureau website, Holtville had an estimated population of 6,678 as of July 1, 2018 and had 4.06 persons per household for 2014-2018 (US Census 2020). This area, however, is designated as low density and the existing stormwater system is operating over capacity. The proposed force main drainpipe connected to the retention basin would only serve the Project and is not considered growth inducing.

The Housing Element of the General Plan provides the basis for establishing housing stock that meets the affordability requirements and other special needs of the community.

The Housing Element for the City of Holtville was updated in 2016 for the planning period of 2017-2022, and was approved by the California Department of Housing and Community Development

#### **XIV. Population and Housing Discussion:**

- a) **Induce substantial 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 Project proposes expansion of the City limits to annex four parcels as well as a General Plan Amendment and pre-zone of the parcels. The Project proposes a 152-unit multi-family development that is consistent with the future vision articulated in the City's General Plan to maintain residential opportunities that meet the needs of all residents adding to and diversifying the City's housing stock. Using a factor of 4.06 persons per household from the Census, the estimated population increase resulting from the Project would be approximately 618 (152 units x 4.06 persons per household) residents (US Census 2020). The anticipated population increase accommodated by the Project would be approximately 9.25%  $\left(\frac{[(6,678 + 618) - 6,678]}{6,678} = 09.25\right)$ . The proposed force main drainpipe connected to the retention basin would only serve the Project and is not considered growth inducing. Undergrounding the Pear Canal would be a safety feature next to the Project. New roads or infrastructure that could induce population growth are not proposed. The proposed Project would provide much-needed housing options (e.g. multi-family) for residents in the County and is considered growth accommodating rather than growth inducing. Therefore, impacts to inducing substantial population growth are considered less than significant.

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

**No Impact.** The proposed Project site is currently vacant. No occupied residential structures are within its boundaries. As a result, the proposed Project would not displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere. The Project would have no impact requiring replacement housing.

<b>XV. PUBLIC SERVICES.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) 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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1) Fire Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Police Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Parks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Other Public Facilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Background:**

The proposed Project will result in an estimated 618 new residents in the City of Holtville (152 units x 4.06 persons per household) (US Census 2020) and increase demand for all public services including law enforcement, fire protection, schools, parks, and other government facilities and/or services. Some of these facilities are currently operating at or over capacity. The information in this section was taken from the "Service Area Plan Draft Report" (Michael Baker 2017). A Service Area Plan (SAP) is required whenever an agency proposes a revision of its service area, its sphere of influence (SOI) boundaries, or land uses within the SOI. The SAP identifies demand for public services and facilities based on population and housing growth projections for the year 2030 and anticipated phasing of development within the planning area. The SAP also discuss the means and financing available for extending facilities and/or services into areas proposed to be annexed to the agency within the time frame of the analysis. The SAP also identified funding mechanisms which can be used to finance facilities and services needed to accommodate growth. These include development impact fees and exactions, benefit assessments, and Mello-Roos community facilities district (CFD) special taxes, which may fund both operations and public facilities (Michael Baker 2017, p. 54).

**Fire Protection**

The City operates the Holtville Fire Department (HFD) which provides fire response, suppression, prevention, and investigation; emergency medical response and advanced life support; community disaster preparedness; hazardous materials response and mitigation; confined space rescue services; and water rescue services within the city boundaries as well as to surrounding jurisdictions pursuant to a mutual aid agreement.

The HFD operates out of two buildings: the main station located at 585 Fern Avenue. The HFD shares this facility with the Imperial County Sheriff's Office which is under contract with the City to provide police services. The HFD currently has a staff of 16 firefighting positions: one part-time fire chief, three full-time firefighters, and twelve paid-call firefighters. All HFD personnel are

fully trained fire fighters. Six firefighters are emergency medical technicians (EMTs) and four firefighters are advanced EMTs (Michael Baker 2017, p. 17).

Departmental equipment includes: two City-owned fire engines; two city-owned utility pick-up trucks; one County-owned fire engine; and one rescue squad vehicle. The City uses a contract ambulance service located at 540 Pine Street for medical emergency response.

### **Police Protection**

The City of Holtville contracts with the Imperial County Sheriff's Office for law enforcement services. The services include traffic patrol; random monitoring of residential and commercial areas, municipal facilities, and schools; investigative and administrative support; coordination of volunteer programs; attendance at City meetings as requested; limited animal control; and dispatching services for public safety and fire emergency calls. The City of Holtville is responsible for one FTE public safety dispatcher and the total expenses for providing all necessary office space, computers, and furnishings for the performance of the contract with Imperial County sheriff. The current contract calls for law enforcement services to be provided 24 hours per day, 7 days a week, and 365 days per year. The Sheriff operates out of the facility it shares with HFD at 585 Fern Avenue (Michael Baker 2017, p. 21).

### **Schools**

Public education in Holtville and the immediately surrounding unincorporated area is provided by the Holtville Unified School District (HUSD, District). The District operates the following public schools (with current enrollments):

- Emmett S. Finley Elementary, 627 East Sixth Street: enrollment 554
- Pine Elementary, 3295 Holt Road: enrollment: 178
- Holtville Junior High (grades 6-8), 800 Beale Avenue; enrollment: 285
- Holtville High (grades 9-12), 755 Olive Avenue: enrollment: 528
- Sam Webb Continuation High (Holtville Adult School), (grades 9-12), 522 West Eighth Street: enrollment: 17
- Freedom Academy of Imperial Valley, 522 West Eighth Street: enrollment: 23

All schools currently have capacity to accommodate the expected growth. HUSD currently has a projected student growth rate of approximately 3 percent annually. The state's recent class size reduction requirements have impacted the District, particularly in K-3 grade levels, creating a need for additional classrooms to meet class size requirements. In addition, the District's after-school programs at Finlay Elementary and Holtville Middle School have put a strain on facilities.

The District assumes that existing schools would continue to serve the population residing in the city. Additionally, the District has indicated that the projected growth to the year 2035 would not affect the District's ability to meet the adopted performance standards. Growth and the expansion of school services would primarily be financed through state funding and development impact fees. The method of construction financing and the facilities, personnel, and equipment that would be required to meet this demand would be determined as growth proceeds in the SOI (Michael Baker 2017, p. 49).

## Parks

According to the City of Holtville Service Area Plan (SAP) (Michael Baker 2017), “The City of Holtville owns and operates approximately 14 acres of developed parks and additional acreage of undeveloped parkland and recreational open space” (p. 22). The Holtville General Plan Conservation/Open Space Element discusses park and recreation facilities. While there is no policy that requires a specific park acreage goal, the Element states: “Require new development to provide parkland or pay in-lieu fees for development of additional recreational opportunities as allowed by the Quimby Act.” The Quimby Act (Government Code Section 66477), provides that a city, as a condition of tentative map approval, may require dedication of land at the rate of 3 acres for every 1,000 potential new residents of the proposed subdivision (Michael Baker 2017, p. 25).

### XIV. Public Services Impacts and Discussion:

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

1) **Fire protection?**

**Less than Significant Impact.** The proposed Project will add an additional 152-multi-family units and an estimated 618 (152 units x 4.06 persons per household) residents (US Census 2020) to the City upon full occupancy that will require fire protection. As a result, there will be an increase in the demand of fire protection and emergency response services. The City has been planning for a new Public Safety Building to house a new fire station combined with a County sheriff substation to be located on the northeast corner of 6th Street and Pine Avenue. This project is listed in the City's CIP along with other interim fire protection projects. However, the funding for the new facility is not in place and the timing of its construction is unknown (Galvan, pers. comm., 2020).

The three full-time firefighters currently employed by HFD assume three 24-hour rotating shifts, thus providing only one full-time firefighter at the station at all times. Therefore, up to two paid-call firefighters must respond to a call, depending on whether it's a medical or fire emergency. However, existing fire protection services are below City standards (Michael Baker 2017, p. 18). Maintenance and operation of the City's fire protection services is financed by the General Fund, primarily through sales and use taxes, property tax, and utility user tax. The City also charges user fees to offset the cost of the building permit review and inspections by the HFD. In addition, the City charges development impact fees specifically for fire protection facilities. These fees may be used to fund development and improvement projects and acquisitions related to City fire facilities and equipment (Michael Baker 2017, p. 20).

Because no new facilities are proposed which could result in physical impacts, the Project's impact to fire protection services is considered less than significant.

2) **Police protection?**

**Less than Significant Impact.** The proposed Project will add an additional 152-multi-family units and an estimated 618 (152 units x 4.06 persons per household) residents (US

Census 2020) to the City upon full occupancy that will require fire protection. As a result, there will be an increase in the demand of police protection.

The current General Plan identifies one officer per 500 population as the performance standard for law enforcement (Michael Baker 2017, p. 21). Sheriff response times in Holtville range from 2.0 to 2.5 minutes for a priority 1 call (life-threatening or in progress) and 2.5 to 3.5 minutes for other calls for service in the City (Michael Baker 2017, p. 21). Holtville contract staff indicates that the City is satisfied with current staffing levels as that the ICSO is able to respond to all service calls expediently and efficiently (Galvan, pers. comm., 2020).

As noted under the discussion of Fire Protection above, the City has been planning for a new Public Safety Building at the corner of 6th Street and Pine Avenue that would house both a new fire station combined with a County sheriff substation. However, the funding for the new facility is not in place and the timing of its construction is unknown (Galvan, pers. comm., 2020).

The City's contract for law enforcement is financed by the General Fund, primarily through sales and use taxes, property tax, and utility user tax. The City also charges user fees to offset the cost of specific services provided under the contract.

The City charges development impact fees specifically for law enforcement facilities. These fees may be used to fund development and improvement projects and acquisitions related to City law enforcement facilities and equipment. Because no new facilities are proposed which could result in physical impacts, the Project's impact to police protection services are considered less than significant.

### 3) Schools?

**Less than Significant Impact.** As a multi-family residential development, the proposed Project will generate students and associated demand for schools. According to the SAP, the HUSD has indicated that the projected growth to the year 2035 would not affect the District's ability to meet the adopted performance standards. Growth and the expansion of school services would primarily be financed through state funding and development impact fees. The method of construction financing and the facilities, personnel, and equipment that would be required to meet this demand would be determined as growth proceeds in the Sphere of Influence (Michael Baker 2017, p. 49). State education funding, the District's share of local property tax revenue, dedicated impact fees, and associated bond issuance will be the primary source of facility funding (Michael Baker 2017, p. 49). Based on existing capacity and funding sources (including Mello-Roos fees for schools) available, no new school facilities are proposed which could result in physical impacts. Therefore, the Project's impact to schools is considered less than significant.

### 4) Parks?

**Less than Significant.** The proposed 152-multi-family development will increase population in the City by approximately 618 (152 units x 4.06 persons per household) residents. The Project includes a Recreation Center but does not have any parks or open space. The SAP indicates that Holtville's park-to-resident ratio is approximately 2.3 acres per 1,000 (14.2 acres/6,246, including the skate park). Therefore, the City may require dedication, or payment of fees in-lieu of dedication, at no more than 3 acres per 1,000

potential residents (Michael Baker 2017, p. 25). This would result in the need for 1.85 acres of parks ( $3 \times 618/1,000 = 1.85$ ). The development of park facilities is financed by the General Fund, grants and participation with other agencies, donations, and impact fees. The mitigation for impacts to park facilities and recreation programs due to population growth is the expansion of park facilities by acquisition through dedication and purchase of park land and its development with park impact fees and other funding sources. City staff has indicated that the Project will be required to pay in-lieu fees to offset the short-fall in park acreage within the Project. No new parks are proposed which could result in physical impacts. Therefore, the Project's impact to parks is considered less than significant.

#### 5) Other Public Facilities?

**Less than Significant Impact.** Areas within the vicinity of the Project site are known to flood during storm events. The Project will not contribute to stormwater within existing facilities as it will not connect to the existing drainage system (Galvan, pers. comm., 2020). The proposed force main drainpipe will convey flows from the on-site detention basin to discharge to a drain or canal. With the addition of the proposed force main drainpipe, impacts to existing stormwater collection would be less than significant.

<b>XVI. RECREATION.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Background:

Refer to the Background discussion for Parks under XV. Public Services, above.

#### XVI. Recreation Discussion:

- 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?**

**Less than Significant Impact.** The Project would be occupied by approximately 618 people ( $152 \text{ units} \times 4.06 \text{ persons per household}$ ). The Project includes an on-site Recreation Center to serve residents. However, the increase in population would increase demand for parks likely resulting in Project residents using existing neighborhood and regional parks. The SAP established a standard of three acres of park land per 1,000 people. Based on this standard, the proposed Project will result in the need for an

additional 1.85 acres of park land ( $[618 \div 1,000] \times 3 = 1.85$ ) dedication or in lieu fees for park improvements. As noted under the discussion of parks above, the Project will be required to pay in-lieu fees as mitigation which could be used for new parks or maintenance of existing parks. Therefore, physical deterioration impacts would be less than significant.

**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?**

**No Impact.** The site plan for the proposed Project (refer to Exhibit C) shows a Recreation Center centrally located in the multi-family development. The environmental impacts of the overall Project, including the Recreation Center are addressed as part of this Mitigated Negative Declaration. No further impacts associated with construction of the recreation facility would occur.

<b>XVII. TRANSPORTATION.</b> <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Background:**

A Draft Traffic Impact Analysis (TIA) was prepared for the Project in 2017 and amended in 2019 (LOS 2019) to account for cumulative growth (Appendix I). A Memo was also prepared on January 8, 2020 documenting that there would be impacts to area intersections as a result of construction traffic associated with the proposed force main drainpipe (LOS 2020). Undergrounding of the Pear Canal would add a negligible number of trips for a short duration. The TIA examined existing traffic conditions on study area roadways; determined project trip generation; and analyzed project traffic under both near-term (Year 2019) and Horizon Year 2030 conditions. The Project study area was determined based on coordination with City of Holtville and County of Imperial staff.

The following intersections were analyzed as part of the TIA:

- 1) Melon Road/Thiesen Road (11th Street)
- 2) Melon Road/Underwood Road (10th Street)
- 3) Olive Rd/Underwood Road (10th Street)

- 4) State Route 115/Alamo Road
- 5) Melon Road/Alamo Road (9th Street)
- 6) Olive Road /Alamo Road (9th Street)
- 7) Melon Road /8th Street
- 8) State Route 115/Zenos Road
- 9) Melon Road/Zenos Road (6th Street)

One roadway segment was also included in the analysis: Alamo Road (9th Street) west of Olive Road.

The operating conditions of the study intersections were measured using the 6<sup>th</sup> Edition Highway Capacity Manual (HCM) Level of Service (LOS) designations ranging from A through F. LOS A represents the best operating condition and LOS F denotes the worst operating condition. The apartment mix is proposed with 32 senior apartments and 120 non-age restricted apartments. Please note, the number of proposed apartments was reduced after completion of the TIA based on 168 non-age restricted apartments. Therefore, the TIA is a conservative analysis for the refined project of 152 apartments. The project can be further refined without redoing this traffic study provided the final unit count does not exceed the trip generation (based on 168 apartments).

Project access is proposed from two driveways: a main driveway on Melon Road and a secondary driveway on Underwood Road (10th Street). The site is approximately 8.19 acres. The Project site is currently vacant land.

Alamo Road (9th Street) between Melon Road and Olive Road has a classification of Arterial in the *City of Holtville General Plan*. This roadway is currently constructed as a two-lane un-divided roadway within approximately 32 feet of pavement with parking generally allowed on the south side of the roadway. A 25 mile per hour sign is posted on the north side just west of Olive Road. A capacity of 17,500 Average Daily Trips (ADT) at LOS E was applied to this segment based on existing conditions of 2 travel lanes (per *General Plan Roadway Performance Standards*) and to be consistent with roadway capacities listed in the *City of Holtville Service Area Plan/Municipal Service Review*, August 2014. The *Service Area Plan/Municipal Service Review* has a limited number of segments listed with the closest one being Thiesen Road (10th Street) West of Melon Road with a capacity of 17,500 ADT at LOS E for a two-lane Arterial roadway. The study area of Alamo Road also has two lanes thereby, supporting use of 17,500 ADT at LOS E capacity.

Traffic counts were conducted at the study area intersections on February 2, 2017. All intersections operated at LOS A or B. However, the County's Traffic Study and Report Policy states that traffic counts should be current, within one year. Therefore, in addition to the Year 2017 scenario, a Year 2019 scenario was forecasted up from Year 2017 counts through the application of a 1.7% growth rate per year or 3.4% total growth rate to represent forecasted year 2019. Once again, each intersection was operating at LOS A or B. Likewise, the roadway segment of Alamo Road (9th Street) from Melon Road to Olive Road was also operating at LOS A (LOS 2019, p. 13).

**XVII. Transportation Discussion:****a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.**

**No Impact.** The proposed Project is anticipated to be completed in year 2022 or 2023. Seven scenarios were analyzed in the TIA that accounted for Year 2017, Forecasted Year 2019, Near-Term 2023, Near-Term 2023 + Project, Near-Term 2023 + Project + Cumulative, Horizon Year 2030, and Horizon Year 2030 + Project Conditions. City staff identified nearby cumulative projects that were included in this analysis (refer to Appendix M of the TIA).

Using the 9<sup>th</sup> and 10<sup>th</sup> Edition of the Institute of Transportation Engineers (ITE) Trip Generation, the Project with 120 multi-family apartments and 32 senior apartments is calculated to generate 996 daily trips with 62 AM peak hour trips (15 inbound and 47 outbound) and 76 PM peak hour trips (47 inbound and 29 outbound). However, this analysis is based on 9<sup>th</sup> Edition rates with 168 apartments that is calculated to generate a higher trip generation of 1,107 daily trips with 77 AM peak hour trips (16 inbound and 61 outbound) and 97 PM peak hour trips (63 inbound and 34 outbound). This results in a conservative analysis of 111 additional daily trips, 15 additional AM peak hour trips, and 21 additional PM peak hour trips over the current project trip generation (LOS 2019, p. 14).

Operational findings by scenario are summarized below:

- 1) Under Year 2017 Conditions, the study intersections and segment were calculated to operate at LOS B or better.
- 2) Under Forecasted Year 2019 Conditions, the study intersections and segment were calculated to operate at LOS B or better.
- 3) Under Near-Term Year 2023 Conditions, the study intersections and segment were calculated to operate at LOS B or better.
- 4) Under Near-Term Year 2023 + Project Conditions, the study intersections and segment were calculated to operate at LOS B or better with no project impacts.
- 5) Under Near-Term Year 2023 + Project + Cumulative Conditions, the study intersections and segments were calculated to operate at LOS B or better with no cumulatively considerable impacts.
- 6) Under Horizon Year 2030 Conditions, the study intersections and segments were calculated to operate at LOS B or better.
- 7) Under Horizon Year 2030 + Project Conditions, the study intersections and segment were calculated to operate at LOS B or better with no project impacts.

As shown, none of the study area intersections or segments operated above the City standard of LOS C with the addition of Project traffic. In fact, each scenario had intersection and segments operating at LOS B or better.

The Project site is bordered by 9th Street on the south and Melon Road on the west. Both roadways are designated as Class II bike routes. Both 9th Street and Melon Road will be improved to design capacity and will be able to accommodate the Class II bike route. No other transit or pedestrian facilities are adjacent to the Project or in the Project area. Therefore, the proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system. No impact would occur.

**b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?**

**No Impact.** The City of Holtville is not currently using Vehicle Miles Traveled as the metric for analyzing transportation impacts. Refer to item a) above. The requirement that VMT be implemented by municipalities will take effect on July 1, 2020.

**c) Substantially increase 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 Project does not include any design features that would increase hazards. The Project does not propose any incompatible uses nor is it proposed in an area where it would be subject to hazards from incompatible uses. However, any work within the public right-of-way should have a traffic control plan in place to maintain at least one lane of travel along 9th Street with appropriate traffic control personnel. Therefore, impacts regarding a substantial increase in hazards due to a geometric design feature are considered less than significant.

**d) Result in inadequate emergency access?**

**No Impact.** Project access is proposed from two driveways, a main driveway on Melon Road and a secondary driveway on Underwood Road (10th Street). The proposed circulation system and access points will be reviewed by the Fire Department for adequacy. No impact is anticipated relative to inadequate emergency access.

<b>XVIII. TRIBAL CULTURAL RESOURCES.</b> Would the Project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 is 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Background:**

The proposed Project is to be developed on five vacant parcels of land at the City/County boundary. The Phase 1 Cultural Resources Survey for the Melon Property Multi-Family Residential Project (BFSA 2017), determined that the vacant parcels have no historical or cultural significance. However, the proposed project site is within an area with cultural ties to the Viejas Band of Kumeyaay Indians. On December 23, 2020 when letters requesting the opportunity to consult were sent to 10 Tribes listed on Native American Heritage Consultation list. The comment period closed on January 27, 2020 with no responses.

**XVIII. Tribal Cultural Resources Discussion**

- 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**

**No Impact.** As part of the Phase I Cultural Resources Survey, a records search was conducted at the South Coastal Information Center (SCIC) at San Diego State University (SDSU). The records search indicated that while there are no previously recorded prehistoric resources recorded within the APE, seven recorded historic resources were identified within a one-mile radius (BFSA 2017, p. 1). However, none of these were identified as being listed or eligible for listing in the California Register of Historical Resources.

In addition, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC). The NAHC SLF search did not indicate the presence of a sacred site within the search radius (BFSA 2017, p. 8). Therefore, no impact would occur regarding a tribal cultural resource that is listed or eligible for listing on the California Register of Historical Resources.

- 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 is 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.**

**Less than Significant Impact.** A SLF search was requested from the NAHC. The NAHC SLF search did not indicate the presence of a sacred site within the search radius. A list of Native American contacts was also provided by the NAHC, and in accordance with their recommendations, all listed Native American tribes were contacted with information about the location and nature of the Project. Three responses were received as part of the initial consultation in 2017. The San Pasqual Band of Mission Indians indicated that the project is out of their territory, and the Cocopah Indian Tribe indicated that they have no comments and do not require further

information regarding the project. One response from the Viejas Band of Kumeyaay Indians indicated the APE is within an area they have cultural ties to and requested to be present during ground disturbing activities (BFSA 2017, p. 8) (refer to item “c” in Section V. Cultural Resources, above). This is addressed through Mitigation Measure CR-1. Therefore, the Project’s impacts to the significance of the resource to a California Native American Tribe is considered less than significant.

<b>XIX. UTILITIES AND SERVICE SYSTEMS</b> Would the Project:	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Background:

The proposed Project site is undeveloped and will require extension of, or connection to, utilities and municipal services from facilities already existing within right-of-ways. The following utility services will be needed from local purveyors: electrical power, natural gas, and communication lines as described below. Background information on each utility or service was obtained from the Holtville Service Area Plan (SAP) (Michael Baker 2017).

### Water

The City of Holtville purchases wholesale water from the Imperial Irrigation District (IID). The raw water reaches the city via the East Highline Canal, through the Pear Main Canal a concrete-lined facility that is part of the IID’s raw water distribution system. From the Pear Main Canal the water flows into city ditch entry at Gate #30 located at the junction of Bonds Corner Road and Bridenstine Road. The raw water is pumped from the city ditch through a 16-inch pipeline into one concrete-lined holding pond and two HDPE-lined holding ponds located along Bonds Corner

Road. The combined capacity of the holding ponds is 11.4 million gallons. From the holding ponds the raw water flows by gravity to a pump station where it is then pumped via a 16" force main approximately 1,900 feet to the City-owned and -operated water treatment plant (WTP) located at 200 West 4th Street (Michael Baker 2017, p. 33).

The City's WTP currently meets the demands of approximately 1,500 service connections for between 1.7 million and 1.9 million gallons per day (mgd) of potable water. The plant has a rated capacity of 3.15 mgd (Michael Baker 2017, p. 33). The current peak day demand is 1.9 mgd (Galvan, pers. comm., 2020). Demand is to be calculated at 150 gallons per capita per day or 525 gpd per equivalent dwelling unit (EDU). Current daily peak water treatment production at the water plant is 1.3 MGD (summer) (Cornejo pers. comm., 2020).

Existing water infrastructure is located within the right-of-way surrounding the site. A 12-inch water line is located to the west of the site within Melon Road and a 12-inch water line is within 9<sup>th</sup> Street to the south (refer to Exhibit C).

### **Wastewater Treatment**

The City of Holtville provides wastewater collection and treatment for the incorporated city and service to adjacent unincorporated areas. The Barbara Worth Country Club (BWCC), located outside City limits to the west, maintains its own wastewater collection system; wastewater from the BWCC is treated by the City. A wastewater rate study completed in 2012 estimates just under 2,000 residential and business connections to the wastewater system.

Holtville's sewer collection system consists of 84,800 feet of gravity sewer mains ranging in diameter from 4 inches to 18 inches. The collection system includes approximately 10,000 additional feet of force mains ranging from 4 to 6 inches in diameter. A 4-inch force main (1,500 feet) flows east along Zeno Road and connects to an 8-inch interceptor main in Hoyt Road. The BWCC is connected to the City's outfall line via a 1.5-mile-long, 8-inch force main; the BWCC force main and pump station are not owned or operated by the City. The sewer mains are made of a variety of materials, including PVC, vitrified clay pipe, and high-density polyethylene. There are approximately 300 manholes maintained by the City Public Works Department and Water/Wastewater Division (Michael Baker 2017, p. 38).

The Holtville Wastewater Treatment Plant (WWTP), owned and operated by the City, is located approximately 3 miles northwest of city limits at 1250 Kamm Road one quarter mile west of Gowling Road. The WWTP provides secondary treatment of wastewater using a trickling filter process followed by continuous backwash filtration and ultraviolet disinfection. The treated effluent is discharged into the Pear Drain, a tributary of the Alamo River, which drains into the Salton Sea. The WWTP's current average flow is 0.56 mgd. The current permitted discharge flow is 0.85 mgd (Michael Baker 2017, p. 39). Current daily flows to the sewer plant average around 0.4 mgd. (Cornejo, pers., comm. 2020). Future demand is to be calculated at 400 gpd per EDU (Galvan, pers. comm., 2020).

Existing wastewater infrastructure is located within the right-of-way surrounding the site. A 12-inch wastewater line is located to the west of the site on the west side of Melon Road and a 10-inch sewer line is within the south side of 9<sup>th</sup> Street to the south of the site (refer to Exhibit D).

## **Storm Water Drainage**

The majority of Holtville's runoff from rainfall is captured in street gutters and conducted through a network of open and enclosed concrete or earthen channels to be discharged into the Alamo River at multiple locations. The main east-west drainage channels in the city are owned and operated by the IID and located within IID easements and was originally intended and designed for the purpose of draining adjacent farmlands. The City and the IID generally require developers of property adjacent to existing open drainage facilities to place them underground as new development occurs. Undergrounding of IID drainage channels and discharge of runoff from developed property into the channels requires an encroachment permit. Underground gravity pipes currently provide runoff conveyance for limited areas of the city. The nearest underground pipes to the Project site are about 300 feet south of West 8th Street on Melon Avenue, a concrete pipe collects the flow from an open channel on the east side of Melon Avenue and appears to convey it through a series of underground pipes and concrete channels within an easement through private property before discharging to the Alamo River about 2,200 feet to the west (Michael Baker 2017, p. 43).

As previously noted, areas within the vicinity of the Project site are known to flood during storm events. However, the Project will not contribute to stormwater within existing facilities as it will not connect to the existing drainage system (Galvan pers. comm., 2020). Instead, the proposed force main drainpipe will convey flows from the on-site retention basin to discharge to an existing outlet to the Alamo River.

## **Electric Power**

Electricity is provided to the City of Holtville and its SOI by the IID, which produces about 55 percent of the power it provides from local sources. The IID will site facilities as needed to serve the buildout of SOI areas (Michael Brandman 2017, p. 52).

## **Natural Gas**

Southern California Gas (SoCalGas) provides natural gas service to the City of Holtville. SoCalGas currently provides service to the City and SOI and meets the current demand for natural gas (Michael Baker 2017, p. 52).

## **Telecommunications Facilities**

SBC provides telecommunications service to the city. The California Public Utilities Commission sets the performance standard through a series of established tariffs. SBC has a central office at 466 Pine Avenue in Holtville. Backbone telecommunications facilities currently exist in the SOI (Michael Baker 2017, p. 51).

Time Warner Cable provides cable television service to the City of Holtville and periodically negotiates franchise renewal with the City. Currently, the City's agreement with Time Warner Cable requires that the service provider finance the expansion of facilities to serve new residential development projects which include 65 homes or more. If the development contains less than 65 homes, the service provider is permitted to distribute the costs of setting up a new service area among its customers (Michael Baker 2017, p. 52).

## Solid Waste

The City of Holtville does not maintain any solid waste facilities, vehicles, or equipment. Collection and hauling services are contracted to a private entity, CR&R Environmental Services Inc., which transports Holtville's solid waste to a regional solid waste facility. The nearest facility is the Holtville Solid Waste Site at 2678 Whitlock Road, north of Norrish Road. CR&R also operates its own recycling facility in El Centro (Michael Baker 2017, p. 51).

## XIX. Utilities and Service Systems Discussion:

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

### Water

**No Impact.** The Project will be served by City of Holtville owned and operated water treatment plant. Water conveyance infrastructure is currently available adjacent to the site to the west (12-inch) and south (12-inch). This infrastructure has adequate capacity and do not require further expansion to accommodate the Project. New 8-inch water distribution lines would be installed within the boundaries of the Project and along 10<sup>th</sup> Street on the north (Refer to Exhibit C).

The City has a current water treatment capacity of 3.15 mgd. At a demand rate of 525 gpd per unit, the Project would require 0.0798 mgd of treatment ( $525 \text{ gpd} \times 152 \text{ units} = 79,800/1,000,000 = 0.0798 \text{ mgd}$ ). The addition of the Project's demand (0.0798 mgd) to existing demand ( $0.798 \text{ mgd} + 1.3 \text{ mgd} = 2.098 \text{ mgd}$ ) would not exceed existing treatment capacity (3.15 mgd). Therefore, the proposed Project would not require the relocation or construction of new or expanded water treatment facilities which could cause significant environmental effects. No impact would occur.

### Wastewater

**No Impact.** The project will be served by City of Holtville owned and operated wastewater treatment plant which has sufficient capacity. Water conveyance infrastructure is currently available adjacent to the site to the west (12-inch) and south (10-inch). This infrastructure has adequate capacity and do not require further expansion to accommodate the Project.

The City has a current wastewater treatment capacity of 0.85 mgd. At a wastewater generation rate of 400 gpd per unit, the Project would require 0.0798 mgd of treatment ( $400 \text{ gpd} \times 152 \text{ units} = 60,800/1,000,000 = 0.068 \text{ mgd}$ ). The addition of the Project's demand (0.068 mgd) to existing demand (0.56 mgd) would result in 0.628 mgd ( $0.068 \text{ mgd} + 0.56 \text{ mgd} = 0.628 \text{ mgd}$ ). This is below the existing treatment capacity of 0.85 mgd. Therefore, the proposed Project would not require the relocation or construction of new or expanded wastewater treatment facilities which could cause significant environmental effects. No impact would occur.

## Storm Water

**Less than Significant Impact.** The existing City owned stormwater collection system within the incorporated City Limits that abuts the Project site and area to be annexed is currently operating over capacity and is unable to accommodate additional flows without improvements. The Project proposes construction of a 2,370 linear foot 3-inch polyvinylchloride (PVC) force main drainpipe connecting to the City of Holtville drainage system. The pipe will extend diagonally from the southwest corner of the proposed across the intersection of Melon Avenue and 9<sup>th</sup> Street then align parallel to the south side of Alamo Road. The alignment will extend west then extend south along the east side of Tamarack Road terminating at a discharge canal. The Project will require an encroachment permits as necessary from IID (to discharge to a drain or canal) and the County (to discharge to a county stormdrain). With the addition of the proposed force main drainpipe, impacts to existing stormwater collection would be less than significant.

## Electric Power

**No. Impact.** IID overhead electrical infrastructure is currently located along Melon Road on the west and along the south side of 9<sup>th</sup> Street. The IID charges connection fees based on the amperage of the service, or a per lot fee for subdivisions. The IID continually upgrades its system and the infrastructure is currently in place to serve the SOI (Michael Baker 2017, p. 52). Any pole mounted electrical transformers owned and maintained by the Imperial Irrigation District that require relocation are the sole responsibility of the developer. The proposed Project would not require the relocation or construction of new or expanded electrical facilities which could cause significant environmental effects. No impact would occur.

## Natural Gas

**No Impact.** No natural gas distribution lines are in the vicinity of the Project site and SoCalGas does not currently have plans for expansion in the SOI. Major natural gas distribution improvements are typically developer-financed (Michael Baker 2017, p. 52). The Project is not intending to extend natural gas infrastructure to the site. No impact would occur.

## Telecommunications

**No Impact.** Overhead telephone lines are currently in place along Melon Road. According to the SAP, an increase in development within the SOI would not affect SBC's ability to serve the area because expansion of service into newly developed areas can be accommodated with existing backbone facilities and personnel. SBC uses service fees to finance the expansion of telecommunication services (Michael Baker 2017, p. 51). The proposed Project is not anticipated to require the relocation or construction of new or expanded electrical telephone facilities which could cause significant environmental effects. No impact would occur.

As previously noted, the City's agreement with Time Warner Cable requires that the service provider finance the expansion of facilities (transmission lines, potential cable plant) to serve new residential development projects which include 65 homes or more (Michael Baker 2017, p. 52). However, new wireless opportunities are offered by other providers that provide the same services as traditional cable television services (Michael Baker 2017, p. 52). The proposed Project is not anticipated to require the relocation or construction of new or expanded cable television facilities which could cause significant environmental effects. No impact would occur.

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

**Less than Significant Impact.** The proposed Project has 13 buildings total including 152 multi-family units. Because the Project has less than 500 units, an SB 610 Water Supply Assessment was not required. Although the buildout projections in the SAP is based on low-density development for this area (up to 6 du/ac), City staff indicates that there is still plenty of capacity in the water treatment plant to accommodate the Project (Galvan, pers. comm., 2020). In addition, the City receives its water supplies from the IID which holds large and senior rights to the Colorado River. Therefore, impacts to existing water supplies associated with the proposed Project are considered less than significant and will not require an expansion to existing entitlements.

**c) Result in a determination by the waste water 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?**

**Less Than Significant Impact.** The Holtville Wastewater Treatment Plant is operating at 66 percent capacity ( $0.56 \text{ mgd}/0.85 \text{ mgd} = 0.65$ ), while the Holtville Water Treatment Plant is operating at 41 percent capacity ( $1.3 \text{ mgd}/3.15 \text{ mgd} = 0.41$ ). As described under item "a)" above, the City's existing wastewater capacity is adequate, and the proposed Project will not require additional wastewater treatment facilities. Therefore, any impacts would be less than significant.

**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?**

**No Impact.** It is City policy to comply with the state's Integrated Waste Management Act of 1989 (AB 939) to reduce waste going to the landfill. The General Plan also identifies the need to encourage the recycling of waste resources through membership with Imperial County and its seven cities in the Imperial Valley Resource Management Agency (IVRMA). The IVRMA is a joint powers authority formed in 2000 to divert solid and hazardous waste generated within the Imperial Valley in accordance with AB 939. The IVRMA provides household hazardous waste collection, conducting weekend collections at

various locations around the county, such as El Centro, Calexico, Brawley, and Heber. The policy of the IVRMA and its member agencies is to maintain and/or increase the county's diversion rate from landfill sites to 50 percent of the total solid waste stream as mandated by AB 939. (Michael Baker 2017, p. 52). The proposed Project would be required comply with City policy on waste reduction. Therefore, no impact would occur regarding generation of solid waste in excess of state or local standards.

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

**No Impact.** All federal, state, and local statutes will be adhered to via local policies as discussed under item "d)", above. Therefore, the Project is anticipated to have no impact regarding compliance with reduction statutes and regulations related to solid waste.

<b>XIX. WILDFIRE.</b> <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project.</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Background

According to the Imperial County General Plan Seismic and Public Safety Element (Imperial County 2016b) the potential for a major fire in the unincorporated areas of Imperial County is generally low (p. 16). The City of Holtville General Plan Safety Element also states that "wildfires do not pose much of a risk to Holtville (City of Holtville 2017, p. 111).

### XX. Wildfire Discussion

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

**No Impact.** The Project site is on the northern edge of the City of Holtville adjacent to unincorporated Imperial County. The Project is bordered by 9<sup>th</sup> Street, the main east-

west route through the City which is also an emergency evacuation route to SR 115. Access along 9<sup>th</sup> Street would be retained throughout Project construction to ensure there are no disruptions to emergency evacuation. No impact would occur regarding impairing an adopted emergency response plan or emergency evacuation plan.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact.** The proposed Project occupies five parcels totaling 8.19 acres. The site is flat, vacant and surrounded by low density urban development. Single-family homes currently exist to the south across the street on Alamo Road Five rural residential homes exist to the west across the street on Melon Road. Two rural residential homes are to the north. Additional rural residential homes exist adjacent to the Project site to the east. The area is classified as an Unzoned Fire Hazard Severity Zone (CDF 2007) on the Draft Fire Hazard Severity Zones in the Local Responsibility Area. Potential for uncontrolled wildfire is unlikely given topography and existing surrounding uses including irrigation canals. Therefore, no impact would occur with regard to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire

- 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.** As previously noted, the Project is located on the border of the City limits of Holtville and Imperial County. No wildlands are located near the site and the Project does not include the installation of any features that may exacerbate fire risk. No impact would occur with regard to installation or maintenance of infrastructure that may result in temporary or ongoing impacts to the environment.

- 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 is located on flat land in the Imperial Valley. No impact would occur that would result in exposing 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.

*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.*

### SECTION 3 - III. MANDATORY FINDINGS OF SIGNIFICANCE

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

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** Implementation of the proposed Project would expand multi-family housing options in the City of Holtville. The Project requires a pre-zone and General Plan Amendment. The site has been previously disturbed but may have potential for nesting birds in scattered on-site vegetation. A pre-construction survey would be conducted to ensure that birds and nests are avoided or protected as required by Mitigation Measure BIO-1. In addition, all workers would be required to undergo WEAP training prior to starting construction in accordance with Mitigation Measure BIO-2. Implementation of these measures would reduce the potential of the project to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal to less than significant levels.

No historical resources are located on the site. Therefore, the Project would have no impact on eliminating important examples of major periods of California history or pre-history.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** The proposed 152-unit multi-family development project has the potential to result in environmental impacts that cumulatively could be considerable such as adding light to the night sky, impacting burrowing owls, discovering unknown cultural resources or human remains, exposure to geologic hazards or construction noise. Each of these potential project-specific impacts is addressed through mitigation measures designed to reduce the effects of the Project. With implementation of mitigation measures AES-1 (Light Trespass), AQ-1 (Block Dirt Roads), AQ-2 (Limit Speed to 15 mph) BIO-1 (Pre-Construction Survey), BIO-2 (WEAP Training), CR-1 (Tribal Notification), CR-2 (Discovery of Human Remains), GEO-1 (Liquefaction), GEO-2 (Site Specific Geotechnical Investigation), GEO-3 (Paleontological Monitoring), HAZ-1 (Mosquito Abatement Plan) and NOI-1 (Noise Reduction Methods), project-specific impacts would be reduced to less than significant levels and the Project's contribution to cumulative impacts would be less than significant.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The Project site requires an annexation and a General Plan Amendment to be consistent with City Zoning and Land Use Designations. The site was historically used for agriculture, but these operations ceased several years ago, and the site is currently vacant. The proposed Project would increase the amount of multi-family housing in the City of Holtville resulting in more housing options for residents. Therefore, the proposed Project would not cause a substantial adverse effect on human beings either directly or indirectly. This impact is considered less than significant.

## **IV. PERSONS AND ORGANIZATIONS CONSULTED**

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

### **A. CITY OF HOLTVILLE**

- George Galvan, Planner

### **B. OTHER AGENCIES/ORGANIZATIONS**

- Imperial Irrigation District
- Holtville Fire Department
- Imperial County Air Pollution Control District
- Imperial County Sheriff's Office

### **C. ENGINEER AND TECHNICAL STUDIES**

- Marie S. Barrett, Biologist - Barrett's Biological Surveys  
(Biological Resources Technical Report)
- Carlos Corales, P.E. - Development, Design and Engineering, Inc.  
(Drainage Report)
- Andrew Garrison, M.A., RPA & Brian F. Smith, M.A. - Brain F. Smith and Associates, Inc.  
(Phase I Cultural Resources Survey)
- Jeffrey O. Lyon P.E. & Stephen K. Williams, PG CEG, GS Lyon Consultants Inc.  
(Phase I ESA)
- Seth Meyers. Senior Air Quality/Noise Task Manager. ECORP Consulting, Inc. (Energy Analysis)
- Joe O-Bannon. Principal. OB-1 Air Quality Analysis. (Air Quality and Greenhouse Gas Impact Analysis)
- Justin Rasas, PE. Principal - LOS Engineering, Inc.  
(Traffic Impact Analysis)
- Stephen K. Williams, PG CEG & Jeffrey O. Lyon P.E., LandMark Consultants, Inc.  
(Geotechnical and GeoHazards Report)

***(Written or oral comments received on the checklist prior to circulation)***

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