

City of Brawley

CEQA Environmental Information Study

1. Project title: City of Brawley Climate Action Plan, Associated General Plan Amendments and Infill Strategy

2. Lead agency names and addresses:

City of Brawley
Planning Department
400 Main St.
Brawley, CA 92227
(760) 344-8822
(760) 344-0907 (FAX)

3. Contact person: Gordon R. Gaste, AICP CEP, Planning Director

4. Project location: Brawley, CA - Citywide

5. Project sponsor's name and address:

City of Brawley
383 Main Street
Brawley, CA 92227

6. General plan designation: Citywide Project, Not Applicable

7. Zoning: Citywide Project, Not Applicable

8. Description of project: The City of Brawley Climate Action Plan [known here forward as the CAP], associated General Plan Amendments and Infill Strategy establishes strategies for reducing municipal and community-wide greenhouse gas (GHG) emissions. The CAP is a proactive strategy document that enables the City to maintain local control of implementing State direction (AB 32 - the California Global Warming Solutions Act) to reduce GHG emissions to 1990 levels by 2020. Proposed GHG reduction strategies either already align with or are being incorporated the existing General Plan policies.

9. Surrounding land uses and setting:

Citywide Project

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

None

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.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

CAP strategies encourage use of green building design features such as cool roofs. Cool roofs use white or reflective roofing material to minimize heat gain in a house. Other green design features could include solar installations on large structures such as parking garages. Solar panel and cool roof installations are subject to design review in Site and Overlay Districts. One goal of the design review process is to ensure there are no adverse effects on scenic vistas. Therefore, the impact is less than significant.

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

There are no scenic resources on the proposed project site; therefore, there will be no impact.

c) In non-urbanized 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?

Same as I (a).

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

Encouraging solar panels or cool roofs on rooftops promotes energy efficiency and the use of renewable energy sources in the city. Solar panels do not reflect light, are not visible at night, and would not create a new source of substantial glare. Cool roofs that are white may create some glare when viewed from a higher vantage point, but the glare is minimal during the day and negligible at night, and therefore would not be considered substantial. The CAP also encourages interior and exterior lights throughout the community to be turned off whenever possible to conserve energy, which also helps preserve nighttime views. Therefore, the impact is less than significant.

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

II. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The CAP is a policy document that provides strategies to reduce GHG emissions in the City. No conversion of farmland is proposed. Conversely, the CAP promotes acquisition of additional open space within the City, which could be farmed or used as community garden space. The document is consistent with Milpitas General Plan policies regarding protection of agricultural lands and would not conflict with existing zoning for agricultural use. No impact would result.

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

Same as II (a).

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))?

Same as II (a).

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

Same as II (a).

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?

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

Same as II (a).

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

The regional plan for Brawley is the Air Quality Attainment Plan for Imperial County. The California Air Resources Board (CARB) which outlines air quality standards and attainment status for multiple air pollutants, including ground-level ozone and its key precursors, ROG and NOx; particulate matter; air toxics; and GHGs. The CAP contains strategies to reduce GHG emissions and improve air quality in the city consistent with the State's primary GHG reduction goals contained in AB 32. The CAP is also consistent with the Air Quality Attainment Plan for Imperial County GHG level Thresholds, and State CEQA Guidelines Section 15183.5, which prescribes criteria for adoption of a qualified GHG reduction plan. Potential impacts to air quality could result from increased infill development, which is encouraged by the CAP. However, new development is subject to CEQA, the Air Quality Attainment Plan for Imperial County thresholds for ozone and particulates, and the City's standard development review process. Compliance with these existing regulations and standards would ensure consistency with the Air Quality Attainment Plan for Imperial County, and result in a less-than-significant impact.

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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Same as 3 a).

c) Expose sensitive receptors to substantial pollutant concentrations?

Same as 3 a).

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

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

Same as 3 a).

IV. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The CAP does not propose new development in the City. However, both infill development and mixed-use development are encouraged. Infill is characterized by development within already urbanized portions of the city that are not primary habitats for identified species of concern. Furthermore, new large development projects that have the potential to affect local wildlife would require project-level environmental review pursuant to CEQA. Therefore, impacts would be less than significant.

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 Game or US Fish and Wildlife Service?

The CAP is a policy document guiding the community to reduce GHG emissions. The CAP does not propose development that would interfere with riparian or sensitive natural communities identified in local or regional plans. Therefore, impacts would be less than significant.

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?

Same as IV a). and b).

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

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

of native wildlife nursery sites?

The CAP does not contain strategies that would affect movement of wildlife species or impede the use of native wildlife nursery sites. Therefore, no impact would result.

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

The CAP does not contain strategies that would affect local policies or ordinances protecting biological resources. Rather, the CAP supports local policies and ordinances protecting biological resources, and specifically promotes expansion of tree canopy within the community. Therefore, no impact would result.

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?

The CAP is consistent with approved local, regional, or state habitat conservation plans. Therefore, no impact would result.

V. CULTURAL RESOURCES. Would the project:

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

The CAP recommends energy conservation measures that may affect historic buildings. However, major alterations to historic buildings would require review and potentially mitigation consistent with the City's Municipal Code procedures for historic resources. Compliance with these existing regulations and standards would protect each historic structure's integrity, resulting in a less-than-significant impact.

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

The CAP is a policy document recommending strategies to reduce GHG emissions. It does not propose any specific development project. There is a remote possibility that ground-disturbing activities could occur as a result of infill, mixed-use, and transit-oriented developments encouraged by the CAP, and that such ground disturbance could uncover previously unknown archaeological resources. In the event that

Issues (and Supporting Information Sources):

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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this occurs, compliance with existing State regulations pertaining to archeological resources, paleontological resources, and human remains would ensure a less-than-significant impact.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Same as V b).

VI. ENERGY. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Encouraging solar panels or cool roofs on rooftops promotes energy efficiency and the use of renewable energy sources in the city.. The CAP also encourages interior and exterior lights throughout the community to be turned off whenever possible to conserve energy, which also helps preserve nighttime views. Therefore, the impact is less than significant.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP was developed using state or local plans There will be no conflicts.

VII. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to 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"/>
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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"/>
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There are no faults identified by the Alquist-Priolo Fault Zone Map that will be impacted by implementing CAP measures and actions. The CAP does encourage infill, mixed-use, and transit-oriented development on the valley floor. Such development would be required to comply with the City building code, which includes seismic design standards. Therefore, compliance with existing development regulations and standards would result in a less-than-significant impact.

Issues (and Supporting Information Sources):

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?				
<i>Same as VI a)i).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Same as VI a)i).</i>				
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Same as VI a)i).</i>				
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>No future project resulting from implementation of the CAP would directly involve major movement of topsoil or directly result in substantial soil erosion. In the event that proposed residential or commercial retrofits or renovations, construction of bike paths and pedestrian improvements, or new mixed-use or transit-oriented development projects pursuant to the CAP require construction activity that may result in substantial soil erosion or loss of topsoil, such activities would be subject to the City's existing grading regulations, which are specifically designed to reduce potential erosion impacts. Therefore, compliance with existing development regulations and standards would result in a less-than-significant impact.</i></p>				
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 landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>No new development projects will result from the implementation of the CAP, although infill, mixed-use, and transit-oriented projects are encouraged. All development projects would be subject to applicable engineering and City building code requirements specifically designed to reduce potential hazards and damage from on- or off-site landslides, lateral spreading, subsidence, liquefaction, or soil collapse. Therefore, compliance with existing development regulations and standards would result in a less-than significant impact.</i></p>				
d) Be located on expansive soil, as defined in				

Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No new development projects will result from the implementation of the CAP although infill, mixed-use, and transit-oriented developments are encouraged. All development projects would be subject to applicable engineering and City building code requirements specifically designed to minimize the possible effects of expansive soil. Therefore, compliance with existing development regulations and standards would result in a less-than-significant impact.

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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No new development projects will result from the implementation of the CAP although infill, mixed-use, and transit-oriented developments are encouraged. All development projects would be subject to applicable engineering and City building code requirements designed to ensure that they are developed on soils which are capable of supporting the use of septic tanks, or alternative waste water disposal systems where sewers are not available for the disposal of waste water. Therefore, compliance with existing development regulations and standards would result in a less-than-significant impact.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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VIII. GREENHOUSE GAS EMISSIONS. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP provides strategies the City can implement to reduce GHG emissions. The CAP identifies a reduction target consistent with the CARB AB 32 Scoping Plan of 15% from the baseline year emissions by 2020. As proposed, implementation of statewide emission reduction programs and local actions identified in the CAP would reduce GHGs by 16.2% (87,450 MTCO2e) from baseline 2005 emission levels, exceeding the 15% reduction target by 2020. Therefore, the CAP establishes a road map to

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

directly and indirectly reduce, rather than increase, community-wide GHG emissions. The impact would be less than significant.

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

The CAP is a policy document that identifies strategies to guide the implementation of GHG reduction measures in the City and quantifies the emissions reductions that result from these strategies. These strategies seek to meet the goal of reducing Brawley GHG emissions 15% below baseline levels by 2020, consistent with guidance provided in the CARB AB 32 Scoping Plan and the Air Quality Attainment Plan for Imperial County GHG Plan-level Significance Thresholds. The CAP also includes adaptation measures to improve the City's ability to address the potential impacts that climate change may have on the City and its residents. The CAP therefore implements, rather than conflicts with, state regulations to reduce GHG emissions (AB 32, SB 375, SB 97). Therefore, there would be no impact.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

No new development projects will result from the implementation of the CAP although infill, mixed-use, and transit-oriented development is encouraged. It is possible that construction activities associated with new mixed-use or transit-oriented development projects or residential and commercial retrofit and renovation projects recommended by the CAP would require use of potentially hazardous construction materials, such as paints and solvents. However, such projects would be required to comply with applicable utility, building, and safety codes designed to reduce hazards to the public and environment. Compliance with existing regulations and standards would result in a less-than-significant impact.

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?

Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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Same as VIII a).

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP does not propose new development in the City which would emit hazardous emissions or require handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impact would result.

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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Where surface or subsurface contamination may be a concern, project applicants are required to prepare an environmental assessment. The assessment would include, but not be limited to: (a) Identification of potential sources of contamination caused by past or current land uses; and (b) evaluation of non-point sources of hazardous materials, including agricultural chemical residues, fuel storage tanks, septic systems, or chemical storage areas. No new development projects will result from the implementation of the CAP, although infill, mixed-use, and transit-oriented projects are encouraged. All development projects would require an assessment of potential hazardous materials, along with a description of the hazard(s) and remedies to avoid or minimize any impacts to acceptable levels. Therefore, the impact would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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There are no projects proposed within the CAP that would negatively affect operation of an airport, caused by height, light interference, or land use incompatibility. Therefore, no impact would result.

Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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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"/>
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No new development projects will result from the implementation of the CAP, although infill, mixed-use, and transit-oriented projects are encouraged. According to standard development review procedures for project applications, individual projects would be reviewed prior to approval by the Fire Department. The CAP does not include recommendations that would physically interfere with the City's Emergency Operations Plan or any established emergency evacuation plan. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The City is not located adjacent to wildlands; therefore, there would be no impact.

X. HYDROLOGY AND WATER QUALITY. Would the project:

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"/>
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No new development projects will result from the implementation of the CAP, although infill, mixed-use, and transit-oriented projects are encouraged. Construction associated with these projects could increase erosion and adversely affect urban runoff. However, any new project resulting from the CAP would be subject to existing City standards requiring setbacks to creeks to protect water quality, and Stormwater Regulations for construction to prevent sediment from entering creek environments. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

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"/>
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Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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The CAP recommends numerous water conservation measures, which may result in reduced demand for water supplies, and an increase in groundwater supplies. The CAP does not recommend any strategy or measure that would require additional water supply that would be attained from groundwater and would not result in any future projects that would substantially interfere with groundwater recharge. Therefore, no impact would result.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP does not recommend any strategy or measure that would directly or indirectly alter drainage patterns. No streams or rivers are anticipated to be altered. Therefore, no impact would result.

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"/>
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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 type="checkbox"/>	<input checked="" type="checkbox"/>
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iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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iv) impede or redirect flood flows?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Same as IX c).

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Same as IX a).

Issues (and Supporting Information Sources):

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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f) Otherwise substantially degrade water quality?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Same as IX a).

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No new development projects will result from the implementation of the CAP, although infill, mixed-use, and transit-oriented projects are encouraged. Any such projects would be subject to the City's flood control program and ordinance, which are designed to reduce flood hazards. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

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"/>
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Same as IX g).

XI. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP does not propose any structures, land use designations or other features (i.e., freeways, railroad tracks) that would physically divide an established community. The CAP does not recommend any strategy or measure that would physically divide the community. Rather, the CAP includes strategies and measures to improve connectivity within Milpitas and to promote alternative transportation methods. Therefore, no impact would result.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP proposes strategies and measures to reduce GHG emissions. Implementing the CAP may require some modification of existing City policies, including the General Plan and Zoning Regulations. However, proposed CAP strategies and measures would generally result in greater avoidance or mitigation of environmental effects, as the CAP is designed to mitigate adverse environmental impacts associated with global climate change. For these reasons, although some changes to existing City policies and plans would result from adoption of the CAP, the intent is beneficial. Therefore, the

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

impact would be less than significant.

XII. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No significant mineral resources are located in the city. Therefore, no impact would result.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Same as XI a).

XIII. NOISE. Would the project result in:

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

While the CAP does not recommend any new project, strategy, or measure that would generate excessive amounts of noise, construction activity associated with recommended energy efficiency retrofits in residential or commercial buildings, new mixed-use or transit-oriented development projects, expansion of bicycle and pedestrian facilities, and installation of distributed renewable energy systems could possibly result in temporary increases in noise levels. However, any construction associated with these activities would be required to comply with the City's Noise Ordinance and regulations designed to reduce noise from construction activities. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

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

Similar to the evaluation within item XII a), temporary construction activities resulting from implementation of CAP measures and actions could potentially result in excessive groundborne vibration or groundborne noise levels for a temporary period of time associated with recommended redevelopment, energy efficiency retrofits in residential or commercial buildings, expansion of bicycle and

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

pedestrian facilities, and installation of distributed renewable energy systems. However, construction activity vibration levels for projects resulting from the CAP would be similar to those of ongoing activities in the urban environment, and would not be excessive. Therefore, this would be a less-than-significant impact.

c) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The project is not located within two miles of a private airstrip. There would, therefore, be no impact.

XIV. POPULATION AND HOUSING. Would the project:

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

The CAP includes strategies and measures to reduce GHG emissions. Proposed measures include encouraging transit-oriented development and retrofitting existing residential and commercial buildings to make them more energy efficient. The CAP does not propose any new housing units or non-residential square feet beyond those already anticipated in the City's general and specific plans. Commercial and residential energy efficiency retrofits that may occur as recommendations from the CAP would update homes already located in Brawley to make them more energy efficient and would not be likely to include additions that make homes larger and accommodate more people. Therefore, the impact would be less than significant.

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

Although CAP strategies and measures encourage energy efficient retrofits for existing homes and encourage new mixed use and transit-oriented development projects, homes would not be displaced. Possible future development activities would likely lead to a greater mix of uses within the City's commercial corridors and would result in more homes. Replacement housing would not be necessary.

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

Therefore, no impact would result.

XV. PUBLIC SERVICES.

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

Fire protection?

As discussed under “Population and Housing,” CAP recommendations could result in construction of new infill, mixed-use, and transit-oriented projects. All new construction is subject to the City’s General Plan growth management regulations and fire service standards. Therefore, compliance with existing regulations and standards and would not create unanticipated demand on fire protection services. This impact would be less than significant.

Police protection?

As discussed under “Population and Housing,” CAP recommendations could result in construction of new infill, mixed-use, and transit-oriented projects. All new construction is subject to the City’s General Plan growth management regulations and police protection standards. The possible increase in population that may occur as a result of implementation of the development recommendations of the CAP would not increase the demand for police protection service to the extent that new police protection facilities would be required. Therefore, compliance with existing regulations and standards and would not create unanticipated demand on police protection services. This impact would be less than significant.

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

Schools?

As discussed under “Population and Housing,” CAP recommendations could result in construction of new infill, mixed-use, and transit-oriented projects. The possible increase in population that may occur as a result of implementation of the development recommendations from the CAP would not increase the demand for school-related service to the extent that new school facilities would be required. If such facilities were required, payment of impact fees for construction of new school facilities would constitute sufficient mitigation for school facility impacts, consistent with state law. Therefore, impacts would be less than significant.

Parks?

The CAP recommends additional parkland to increase carbon sequestration from trees, plants and untilled soil. Construction of new parkland is subject to General Plan policies in the Parks and Recreation Element, as well as engineering design standards, which prevent substantial adverse physical impacts. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

Other public facilities?

As discussed under “Population and Housing,” CAP recommendations could result in construction of new infill, mixed-use, and transit-oriented projects. The possible increase in population that may occur as a result of implementation of the strategies from the CAP would not be expected to increase the demand for libraries or other governmental services to the extent that new facilities would be required. Therefore, compliance with existing regulations and standards and would not create unanticipated demand on other public facilities. This impact would be less than significant.

Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVI. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP promotes expansion of the City park network, which would create more opportunities for users and less concentrated impact on existing parks and recreational facilities. Therefore, no impact would result.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP recommends additional parkland to increase carbon sequestration from trees, plants and untilled soil. Construction of new parkland is subject to General Plan policies in the Parks and Recreation Element, as well as engineering design standards, which prevent substantial adverse physical impacts. Therefore, compliance with existing regulations and standards would result in a less-than-significant impact.

XVII. TRANSPORTATION Would the project:

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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Implementation of CAP strategies would increase the availability of transit service for Milpitas residents, add additional bicycle and pedestrian facilities, and discourage single-occupancy vehicle use. Achieving each of these goals would reduce traffic loads, which would reduce the number of vehicle trips, volume to capacity ratio, and intersection congestion within the City. New infill, mixed-use, and transit-oriented development projects recommended within the CAP would be designed specifically to reduce vehicle trips and place more people within walking distance of commercial uses and public transit. Furthermore, no proposed strategy would directly increase traffic in relation to the existing traffic load and capacity of the street system. Therefore, the impact would be less than significant.

Issues (and Supporting Information Sources):

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See XVII a).

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP does not include any strategy that would promote the development of hazardous road design features or incompatible uses. Rather, the CAP promotes the development of new bicycle and pedestrian facilities built to current standards, which would provide greater safety for pedestrians, bicyclists, and drivers. Therefore, the impact would be less than significant.

d) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP recommends strategies and measures that would increase safety for drivers, pedestrians, and bicyclists and seeks to reduce the number of automobiles on Milpitas streets, both of which could make access for emergency vehicles easier and more efficient. No strategy proposed in the CAP would result in the development of uses or facilities that would degrade emergency access. Therefore, the impact would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES:

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issues (and Supporting Information Sources):

Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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of which could cause significant environmental effects?

Implementation of the CAP would not result in an unanticipated increase in population through infill, mixed-use, and transit-oriented developments. Thus, resulting needs for water, storm-water, and wastewater treatment would not increase substantially. No expanded or new treatment facilities would be required. Therefore, the impact would be less than significant.

b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See XIX b).

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See XIX b).

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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The CAP promotes recycling, and an increased waste diversion rate, both of which would reduce disposal of solid waste to landfills, thereby extending landfill capacity. Therefore, the impact would be less than significant.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CAP would not recommend any strategy that would not comply with applicable solid waste regulations. Conversely, the CAP promotes recycling and includes actions to achieve and improve upon existing waste reduction goals. No impact would result.

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

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

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

n/a

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?

n/a

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?

n/a

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?

n/a

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

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?

The CAP is a proactive strategy document that enables the City to maintain local control of implementing State direction (AB32 – the California Global Warming Solutions Act) to reduce GHG emissions to 1990 levels by 2020. GHG reduction strategies align with existing General Plan policies. Strategies in the document would improve, rather than degrade the quality of the environment, and the quality of life for human beings in Brawley. No impact would result.

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

Issues (and Supporting Information Sources):

Potentially Significant Impact

Less Than Significant with Mitigation Incorporation

Less Than Significant Impact

No Impact

probable future projects)?

Having an adopted CAP will allow the City to streamline CEQA review process of certain projects. Senate Bill (SB) 97 amended CEQA to identify GHG emissions associated with a project as a potentially significant environmental impact but also allowed lead agencies to analyze and mitigate the effects of GHG emissions at a programmatic level, such as in a general plan, or as part of a separate plan to reduce GHG emissions (State CEQA Guidelines Section 15183.5). The CAP serves as the City's qualified GHG reduction plan, which allows the CAP to be used in the cumulative impacts environmental analysis of projects. The environmental review for each project must identify those requirements specified in the CAP that apply to the project, and if those requirements are not otherwise binding or enforceable, they should be incorporated as mitigation measures applicable to the project (State CEQA Guidelines Section 15183.5b). Therefore, no cumulatively considerable impacts would result.

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

Same as XVIII a).

XVIII. EARLIER ANALYSES.

Earlier analyses may be used where, pursuant to the tiering, program EIR or other CEQA process, on or more effects have been adequately analyzed in an earlier EIR or Negative Declaration per Section 15063(c)(3)(D).

1. **CEQA Guidelines - Environmental Thresholds (Professional judgment and expertise and review of project)**
2. **City of Brawley General Plan and Mitigated Negative Declaration (2008)**
3. **City of Brawley Water Master Plan (1999)**
4. **City of Brawley Wastewater Master Plan (1999)**
5. **California Department of Conservation , *Imperial County Important Farmlands (2010), Map (June 2014)***
6. **United State Department of Agriculture, Soil Conservation Service, *Soils of Imperial County, 1981***
7. **Imperial County Air Pollution Control District Air Quality Handbook (2007)**
8. **Imperial County Airport Land Use Compatibility Plan (1996)**