

DRAFT
Initial Study & Environmental Analysis

For:

Glamis Specific Plan (SP 19-0001)
Zone Change (19-0006)
Conditional Use Permit (#19-0027)
Initial Study (IS) #19-0030)



Prepared By:

COUNTY OF IMPERIAL

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SECTION I. INTRODUCTION

A. PURPOSE

This document is a ☒ policy-level; ☐ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Glamis Specific Plan Project.

B. CEQA REQUIREMENTS AND THE IMPERIAL COUNTY “GUIDELINES AND REGULATIONS TO IMPLEMENT CEQA AS AMENDED”

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

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

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

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

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

This Initial Study is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial’s Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

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

C. INTENDED USES OF INITIAL STUDY

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

The Initial Study prepared for the project will be circulated for a period of 35 days for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

IV. PERSONS AND ORGANIZATION CONSULTED identifies those persons consulted and involved in preparation of this Initial Study.

V. REFERENCES lists bibliographical materials use in the preparation of this document.

VI. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING AND REPORTING PROGRAM (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **Potentially Significant Unless Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.”
4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

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

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

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

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

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

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

2. Incorporation By Reference

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

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

-
- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines, Section 15150[a]). The General Plan EIR is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, phone (442) 265-1736.
 - This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243; phone (442) 265-1736.
 - These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
 - These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the 1993 County of Imperial General Plan Final EIR is SCH #93011023.
 - The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

SECTION II. ENVIRONMENTAL CHECKLIST

1. **Project Title:** Glamis Specific Plan
2. **Lead Agency Name and Address:** Imperial County Planning & Development Services Department
3. **Contact Person and Phone Number:** Patricia Valenzuela, Planner IV, 442-265-1749
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** PatriciaValenzuela@co.imperial.ca.us
6. **Project Location:** The proposed Specific Plan Area is located in the unincorporated community of Glamis, a remote area in the eastern portion of Imperial County. The Specific Plan Area is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea (**Figures 1 and 2**). The Specific Plan Area consists of approximately 143 acres located within Section 33, Range 18 East, Township 13 South within the U.S. Geological Survey (USGS) Glamis, California 7.5-minute topographic quadrangle (Assessor Parcel Numbers [APNs] 039-310-017, 039- 310-022, 039-310-023, 039-310-026, 039-310-027, 039-310-029, and 039-310-030).
7. **Project Sponsor's Name and Address:** Polaris Industries Inc.
8. **General Plan Designation:** Glamis Specific Plan Area (GSPA)
9. **Zoning:** The existing zoning designations within the Specific Plan Area are Open Space/Preservation (S-2) and General Commercial (C-2) (**Figure 3**).

10. Description of Project:

The GSP creates a distinctive master-plan for recreation-serving land uses which are consistent with the historical use of the Glamis area. It provides for a great deal of flexibility as to the development of potential land uses within the GSP to promote the concept of an open desert playground that derives from the "Camp RZR" event, historically held in October of each year at the GSP area, and the surrounding Imperial Sand Dunes Recreation Area (ISDRA). This area attracts hundreds of thousands of OHV enthusiasts every Halloween, Thanksgiving, Christmas, New Years, and President's Day weekend.

The GSP consists of eight (8) Planning Areas, depicted on **Figure 4**. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3). This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands.

Planning Areas 5 and 6 are designated Commercial-Recreation 1 (CR-1). This designation is intended to allow small scale, low density development of projects. These projects will be designed to deter the use of OHVs on

public highways or roads. These projects could include employee housing, research and development (R & D) facilities, RV park with restrictions and the like.

Planning Area 7 is designated Commercial-Recreation 2 (CR-2). This designation is intended to accommodate recreational related commercial opportunities and projects that will support the OHV and recreational uses of the area at a higher density and allowable uses than CR-1 but still be limited to specific uses that are less intense and more occasional than those allowed in CR-3. This could include small repair shops, limited housing, RV park with restrictions and the like.

Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation. S-1 is used to recognize areas that embody the unique Open Space and Recreational character of Imperial County including the deserts, mountains and water front areas. The S-1 designation is primarily characterized by low intensity human utilization and small-scale recreation related uses.

As envisioned, the GSP will facilitate an entertainment enclave among the iconic dunes. This enclave will enhance the historic experiences that OHV riders and visitors expect when they visit the dunes.

The following is a brief description of the proposed land uses within the GSP (**Figure 5**).

Recreational - The GSP provides an opportunity for a variety of recreational activities to complement the established "Glamis" sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as OHV training, OHV rentals, etc.), amusement facilities, Desert Tours (off road experience), racetrack, shooting range, park/playground/picnic area, and other recreational-based activities.

Commercial/Retail - The GSP will allow for a wide range of commercial and retail development, which include fuel stations, rental facilities, entertainment and hospitality uses, and sporting goods stores to accommodate the needs of visitors to the Glamis area. It may also provide for RV Park(s) to accommodate a small number of users that desire to have conveniences not found in open dry camping.

Storage - OHV and RV storage is an existing land use within the Specific Plan Area. The GSP will provide for storage for OHVs and RVs to allow visitors to store their vehicles at Glamis year around.

Entertainment - The Glamis area has long been known as the premier destination for OHV enthusiasts to enjoy their recreational activities within the world-renowned ISDRA. The GSP will allow for a range of entertainment land uses whose purpose is to enhance the visitors experience to the Glamis Area. Entertainment uses could include an adventure center, amusement facilities, movie theater, obstacle courses, a fireworks and light display area, and racetrack.

Hospitality - With an average annual attendance of 200,000 visitors to the Glamis area, the GSP will provide for the development of various hospitality services to provide visitors with the accommodations they need to fully enjoy all that the Glamis area has to offer. Hospitality land uses may include medical services facility, mobile food trucks, tourist information center, public showers, public restrooms, and hotel/motel facilities.

Residential - The GSP will allow for limited residential development to accommodate those who require temporary housing in Glamis. Housing will be developed in the form of guest, employee housing, seasonal private residences and temporary use of RVs on Owner's property.

Renewable Energy - Due to the remote location of the GSP, renewable energy facilities will be developed to provide electricity to the Specific Plan Area. The GSP will allow for the development of a solar and wind energy generation facilities (including battery storage) located throughout the GSP, shown on **Figure 5**.

Infrastructure Improvements - In order to properly accommodate the large volume of visitors to the Specific Plan Area, existing water and wastewater facilities will need to be improved along with the development of additional infrastructure. The GSP will allow for the development of utility buildings, utility substation(s), renewable energy generating facilities and battery storage facilities, as well as water/wastewater treatment facilities and pipelines. Water needs for the Specific Plan and local fire safety requirements would be supplied from an existing well that would be modified as part of the Project. This water is unsuitable for consumption without treatment. Therefore, the Applicant proposes to install a water treatment (e.g. reverse osmosis system) to so that it would be potable for use.

Research & Development Facility - The GSP provides for a R&D facility that will take advantage of the close proximity of the ISDRA. This R&D facility will allow Polaris to test their equipment in a natural and private setting.

11. Surrounding Land Uses and Setting:

The Specific Plan Area is surrounded by open desert land that is managed almost entirely by the BLM. Directly northwest of the Specific Plan Area, is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use, however, camping is allowed. The Specific Plan Area is directly adjacent to the ISDRA to the southwest, south and southeast. The ISDRA is the largest mass of sand dunes in the State of California. North of the NADW is the Chocolate Mountain Aerial Gunnery Range (CMAGR) which is a live-fire training range used for developing and training Marine Corps and Navy aviators. The area to the north east of the Specific Plan Area is BLM land but is not part of the ISDRA. **Figure 11, Surrounding Land Use**, shows the relationship between the Specific Plan Area and surrounding vicinity with the ISDRA located immediately to the southwest, the NADW immediately to the northwest, and the Chocolate Mountains and the CMAGR located to the north.

The Specific Plan Area is located on private land that is directly between the ISDRA and the North Algodones Dunes Wilderness in an unincorporated area of Imperial County. The Specific Plan Area contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store. The Specific Plan Area includes seven project parcels. The Specific Plan Area is regionally accessible via SR-78 (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road, serves as a secondary form of access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The Specific Plan Area is also crossed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the Specific Plan Area and Wash Road which parallels the UPRR south of SR-78.

The Specific Plan Area can be characterized as an area of open desert with several adjoined one- and two-story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store. Additionally, there is a separate seasonal OHV repair business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower is located at the southeast portion of the Specific Plan Area. Due south is a single-family residence,

large RV storage garage, and other related equipment storage buildings. Additionally, a pre-fabricated residential structure is located on the southeast corner of the Specific Plan Area. To the west, across SR-78 and opposite the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Last, on the northeast side of the Specific Plan Area, crossing the UPRR, there are two triangular parcels that are currently vacant. The topography of the Specific Plan Area can be characterized as relatively flat. The only minor changes in topography are found along the northeast portion of the property (northeast side of the UPRR), which can be attributed to existing elevated flood control earthen dikes and a slight, gradual southwest to northeast trending slope contour. Overall, the elevation of the Specific Plan Area ranges from 325 feet above mean sea level (msl) at the southwest corner to 344 feet above msl at the northeast corner. Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the Specific Plan Area.

Special events, such as Camp RZR, are permitted within the Specific Plan Area through the issuance of discretionary temporary event permits and Conditional Use Permits (CUPs) by the County. Currently, special and temporary events are permitted under CUP #08-0025. Events such as Camp RZR are required to undergo review and approval of event operations and protocols with the County and key stakeholder agencies.

12. Other Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement):

To approve a Specific Plan and a Zone Change. Other agency permits and approvals are listed below:

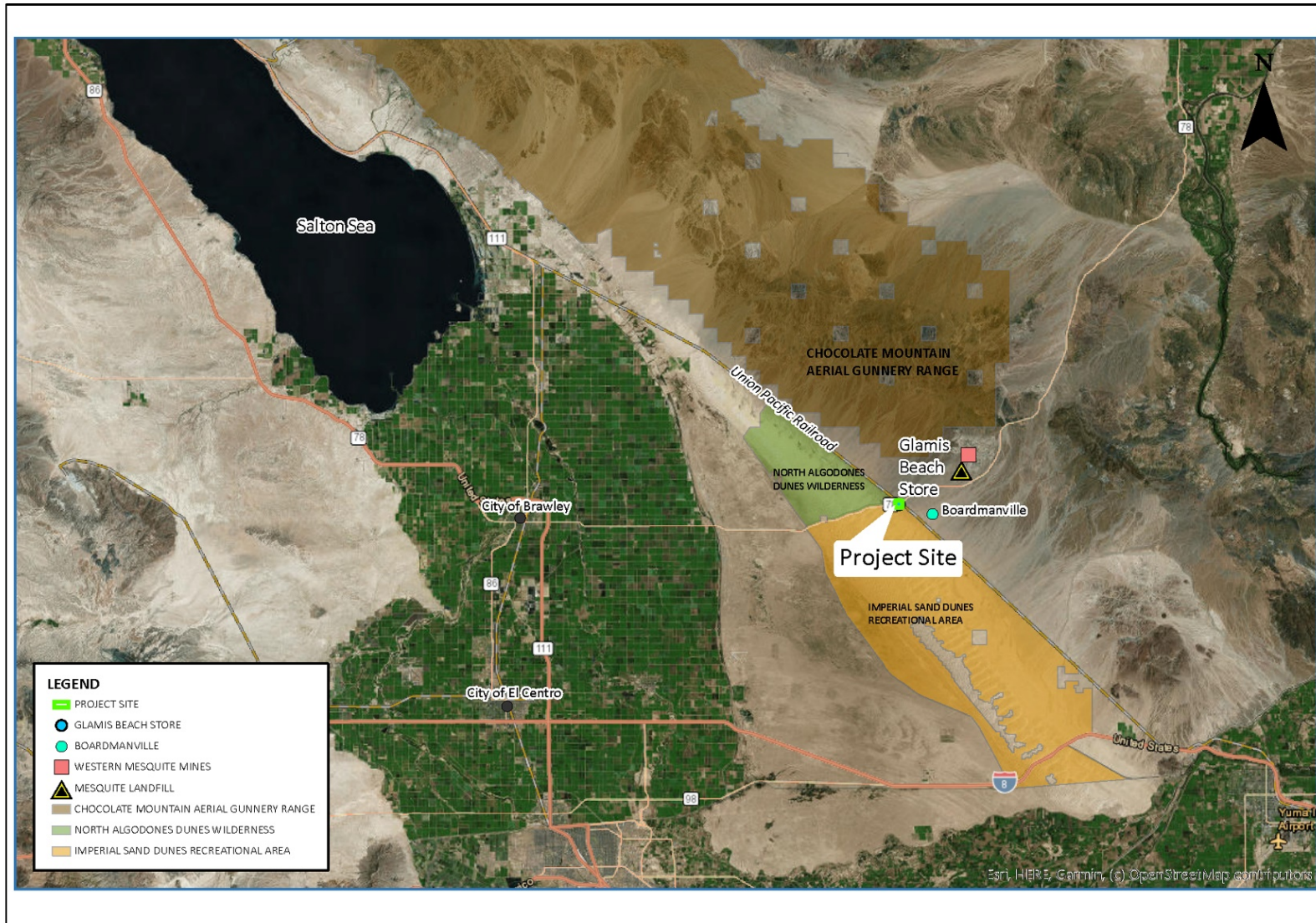
- Approval of the General Plan Amendment: A General Plan Amendment would be necessary to change the entire Specific Plan area from the current General Plan land use designation on the City's General Plan Land Use Map.
- Approval of the Specific Plan: The Glamis Specific Plan has been prepared to realize the objectives of the Project as defined in the Specific Plan. The Specific Plan would be adopted by resolution by the County of Imperial Board of Supervisors, with the Development Standards chapter adopted by ordinance.
- Approval of a Zone Change: A zone change would be necessary to change the zoning within the Specific Plan area from the current "Open Space (S-2) and "C-2" to "Glamis Specific Plan" on the County's zoning map.
- Section 404 Permit: United States Army Corps of Engineers, Clean Water Act (CWA) Section 404 Permit may be required, as necessary. Section 401 Permit: Santa Ana Regional Water Quality Control Board CWA Section 401 Permit may be required, as necessary.
- Streambed Alteration Agreement: California Department of Fish and Wildlife Streambed Alteration Agreement under Section 1602 of the California Fish and Game Act may be required, as necessary.
- Encroachment Permit: Caltrans Encroachment permit.
- Imperial County Air Pollution Control District: Authority to Construct and Permit to Operate.
- State Water Resources Control Board: National Pollutant Discharge Elimination System General Permit.
- Regional Water Quality Control Board (Region 8): Waste Discharge Requirements.

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

In compliance with Senate Bill 18 (SB 18; Government Code Section 65352.3), the Imperial County Planning & Development Services Department (ICPDSD) sent letters to 14 federally recognized California Native American Tribes and 6 tribal representatives on February 11, 2020, providing notification of the Project and an invitation to participate in consultation. By law, tribes have 90 days from the date of receipt of the notice to request consultation (Government Code 65352.3(a)(2)).

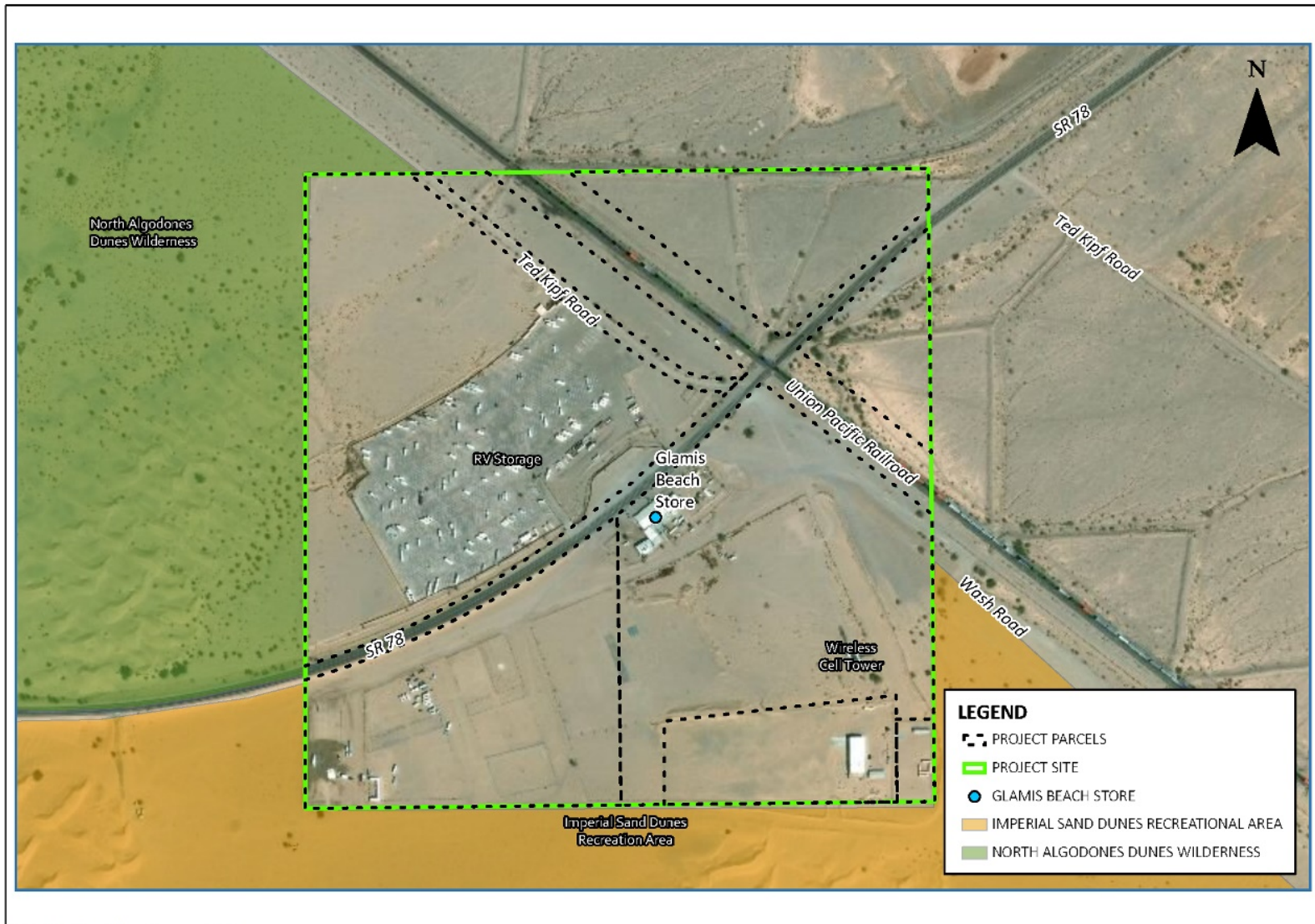
In compliance with Assembly Bill 52 (Chapter 532, Statutes 2014), the ICPDSD sent letters to one (1) California Native American Tribe on February 7, 2020, providing notification of the Project and an invitation to participate in consultation. Under AB-52, California Native American Tribes have 30 days from the date of receipt of the notice to request consultation.

As of the date of this Initial Study, no consultation requests have been received.



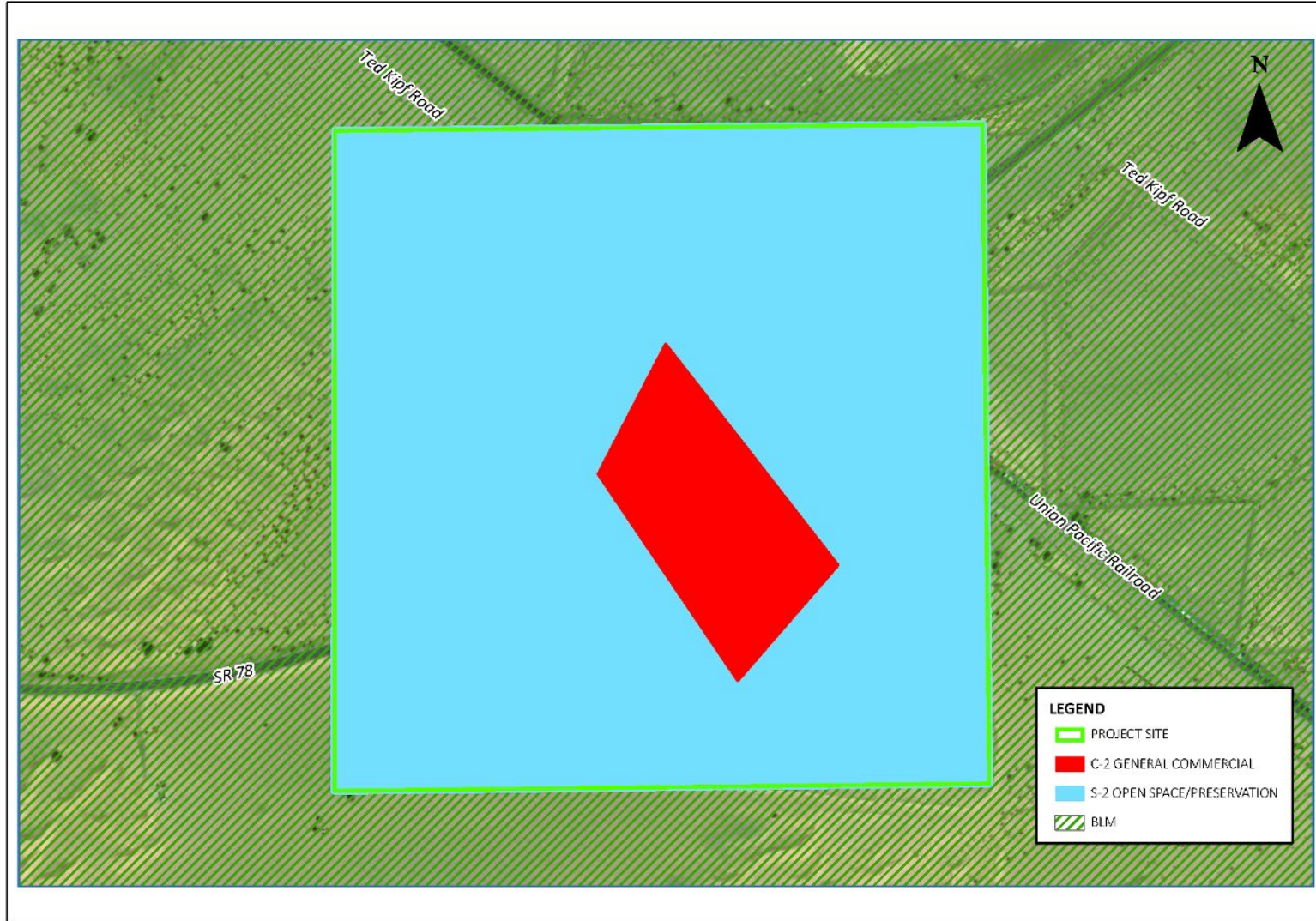
SOURCE: The Altum Group, 2020

Regional Location
Glamis Specific Plan
Figure 1



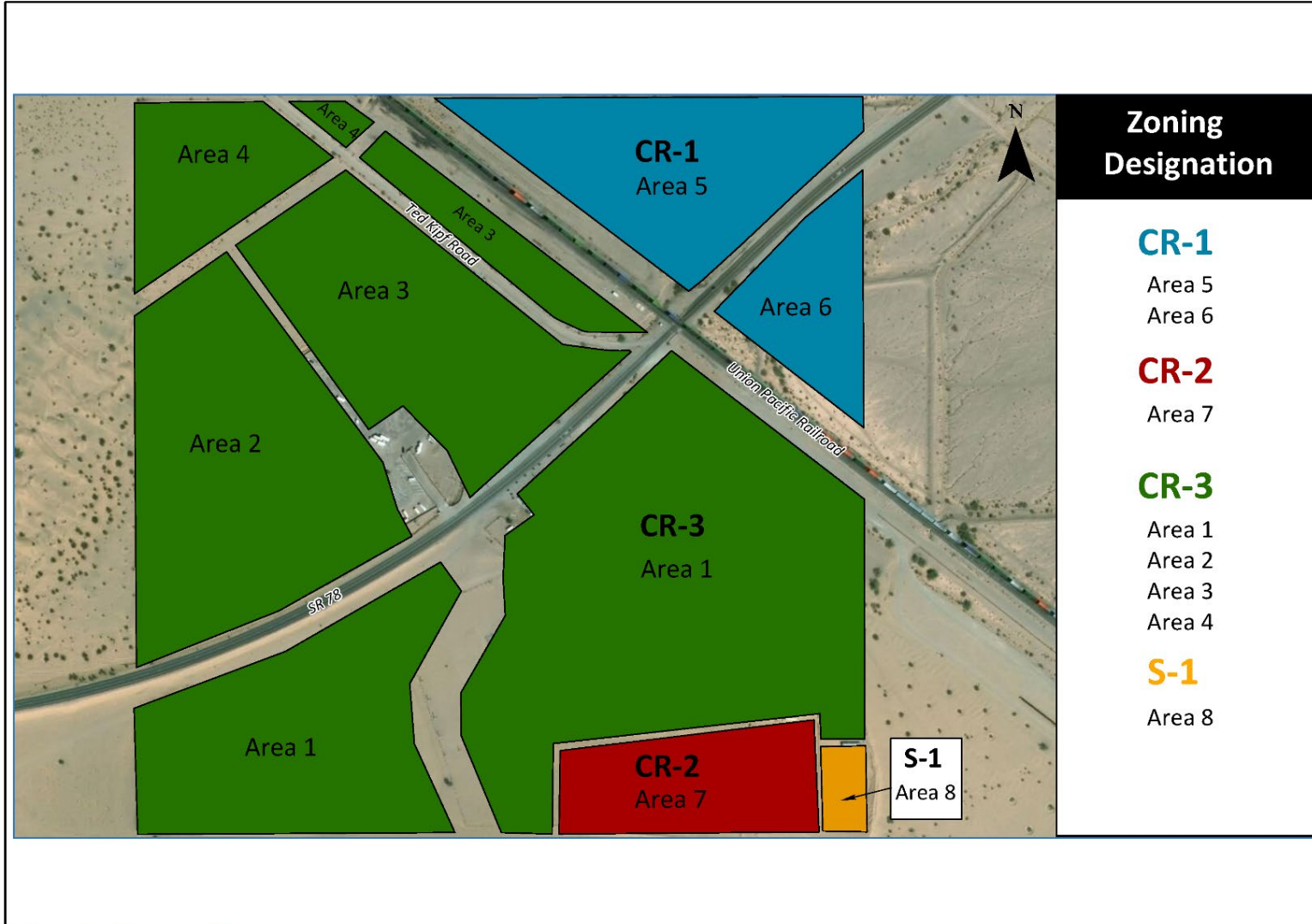
SOURCE: The Altum Group, 2020

Project Location
Glamis Specific Plan
Figure 2



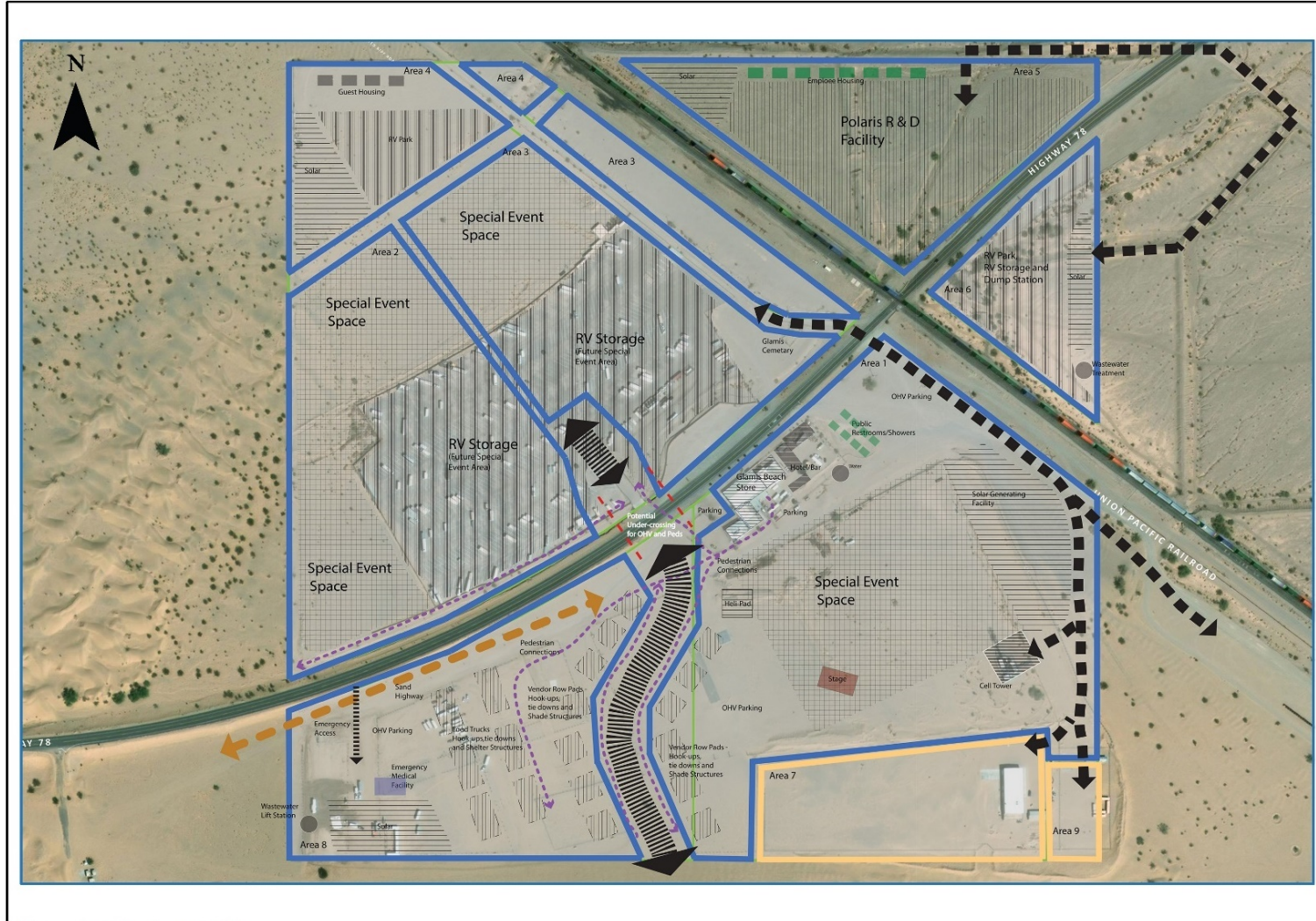
SOURCE: The Altum Group, 2020

Existing Zoning
Glamis Specific Plan
Figure 3



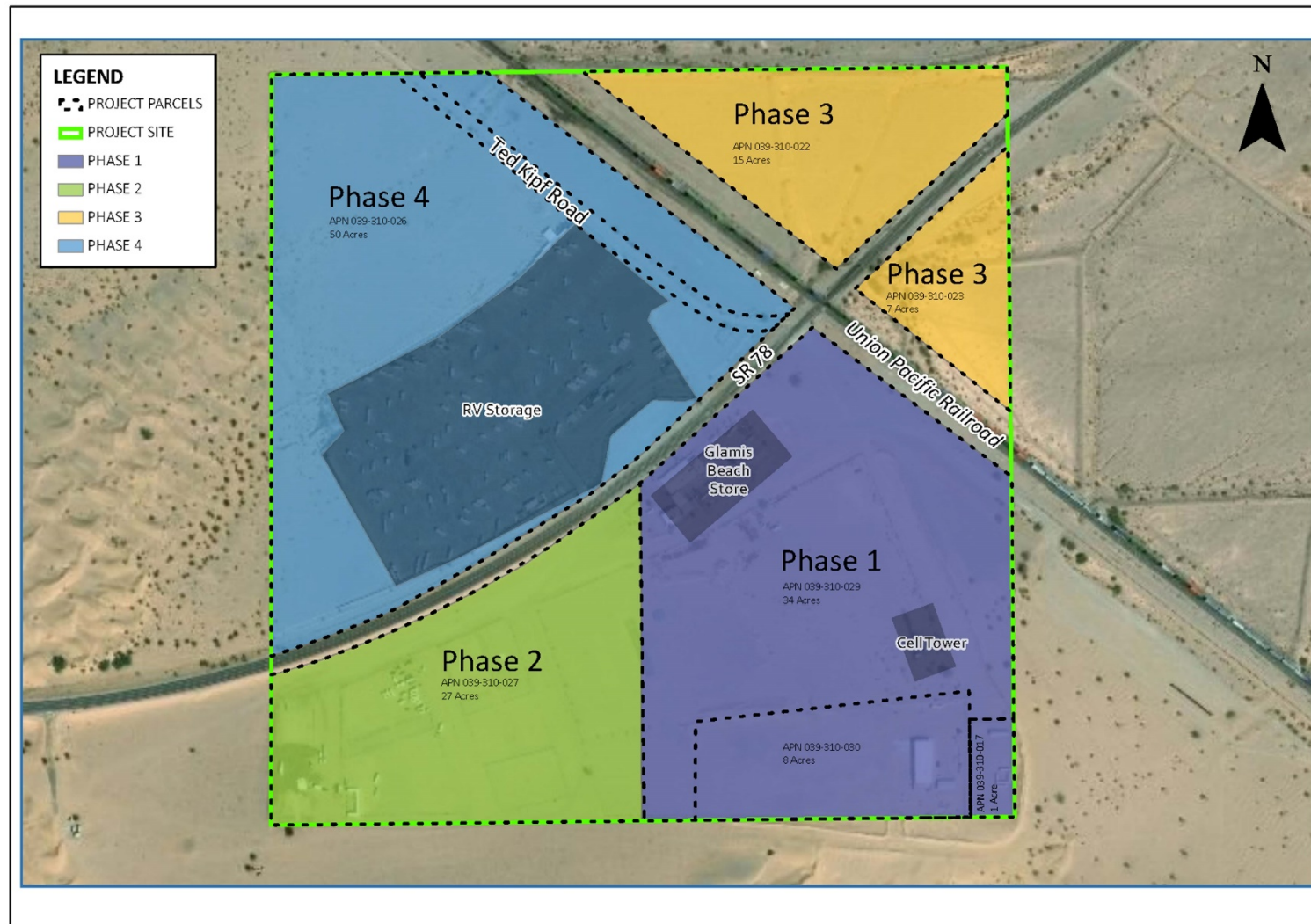
SOURCE: The Altum Group, 2020

Proposed Planning Areas and Zoning Designations
Glamis Specific Plan
Figure 4



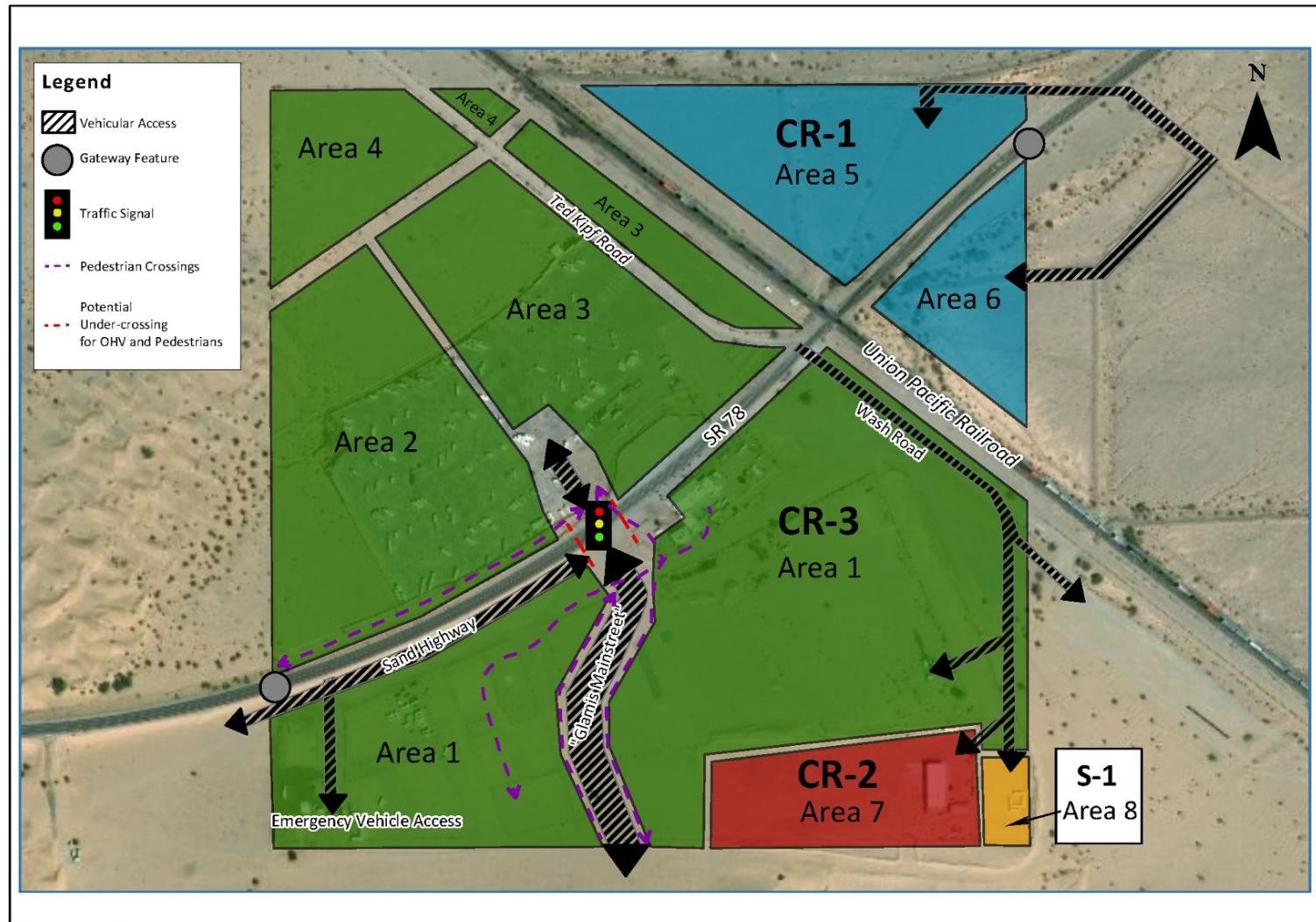
SOURCE: The Altum Group, 2020

Conceptual Site Plan
Glamis Specific Plan
Figure 5



SOURCE: The Altum Group, 2020

Proposed Phasing Plan
Glamis Specific Plan
Figure 6



SOURCE: The Altum Group, 2020

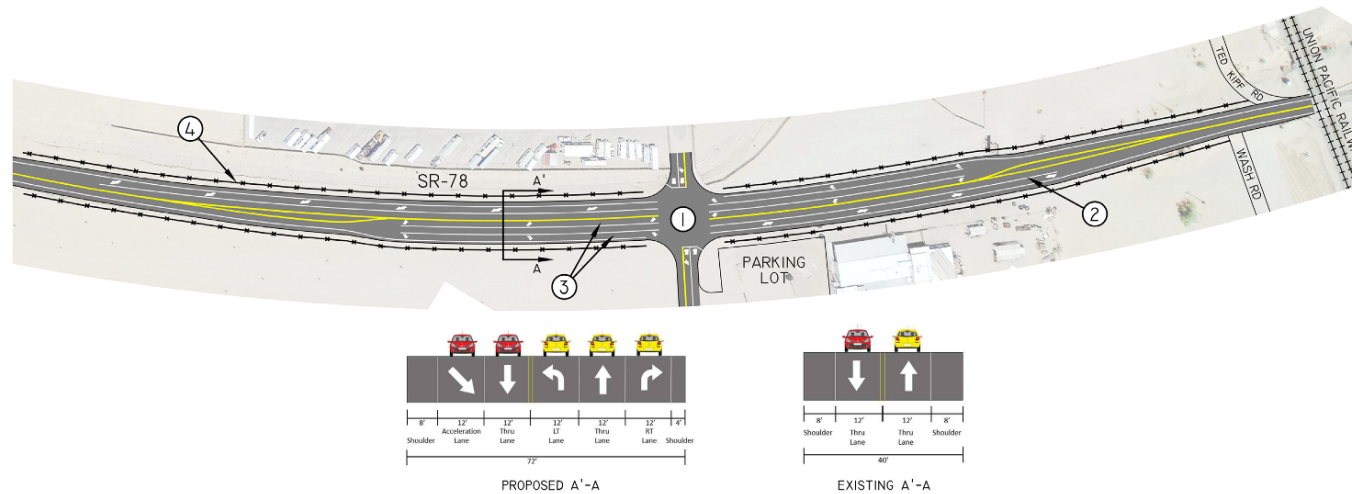
Conceptual Circulation Plan
Glamis Specific Plan
Figure 7

GENERAL NOTES:

- A TRAFFIC STUDY IS NEEDED TO DETERMINE SEVERAL DESIGN ELEMENTS
- EXTENSIVE COORDINATION WITH CALTRANS AND THE COUNTY IS NEEDED TO DETERMINE THE FINAL DESIGN ELEMENTS
- ANY DEVIATIONS TO DESIGN STANDARDS REQUIRE PROCESSING AND APPROVAL BY CALTRANS HEADQUARTERS
- TRAFFIC MANAGEMENT PLAN IS NEEDED DURING LARGE SPECIAL EVENTS (I.E. CAMP RZR)

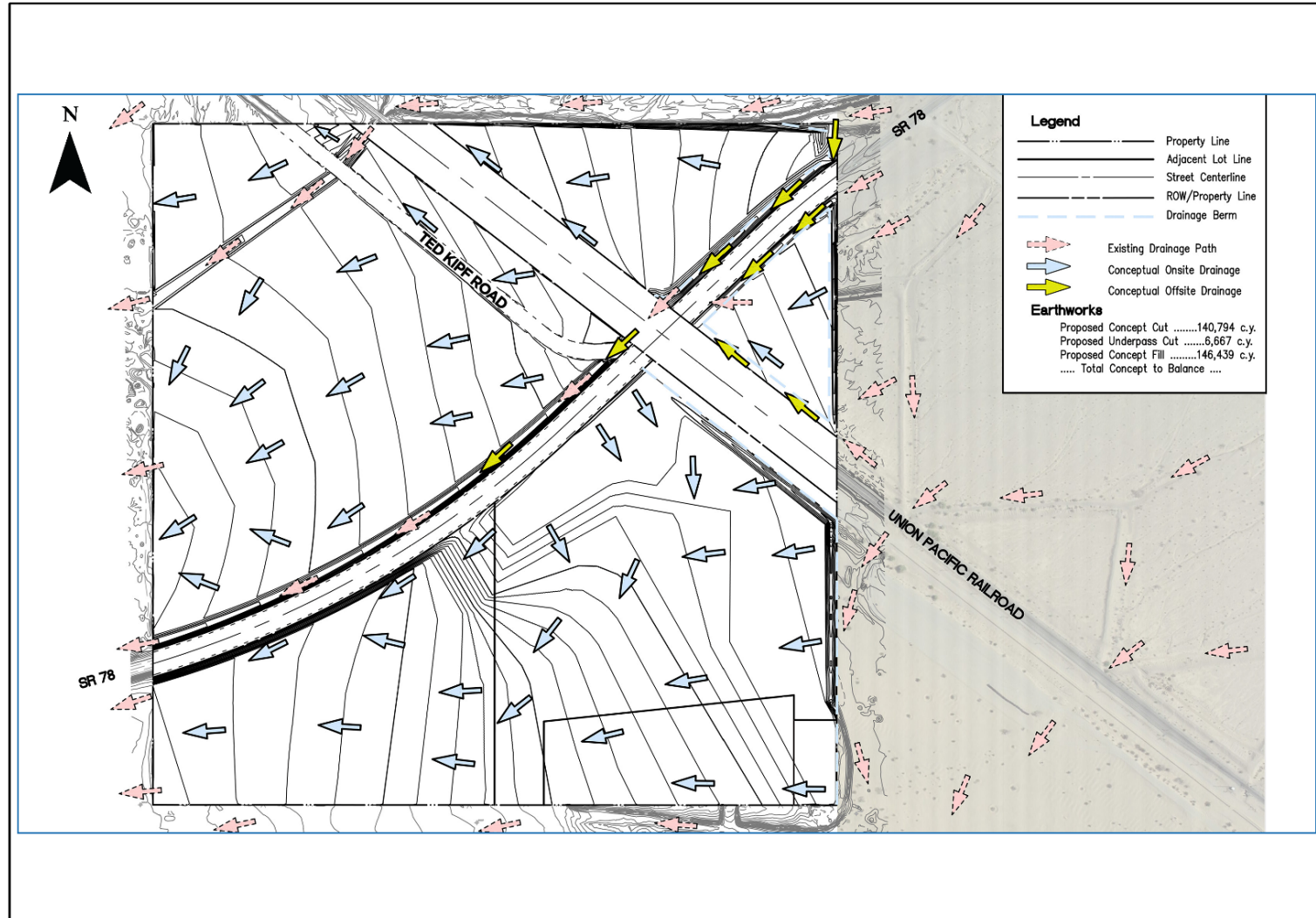
NOTES:

- ① PROVIDE A TRAFFIC SIGNAL IF WARRANTED. IF A TRAFFIC SIGNAL IS WARRANTED, ACCELERATION LANES MAY NOT BE NEEDED.
- ② 600 FEET OF ACCELERATION LANE LENGTH IS DEPICTED. TO PROVIDE THE RECOMMENDED 960 FEET OF ACCELERATION LANE LENGTH, COORDINATION IS NEEDED WITH THE UNION PACIFIC.
- ③ 100 FEET OF LEFT AND RIGHT TURN LANE STORAGE IS ASSUMED. THE ASSUMED STORAGE LENGTH PLUS 485 FEET OF DECELERATION LENGTH IS DEPICTED.
- ④ PHYSICAL BARRIER ALONG PROJECT FRONTAGE.



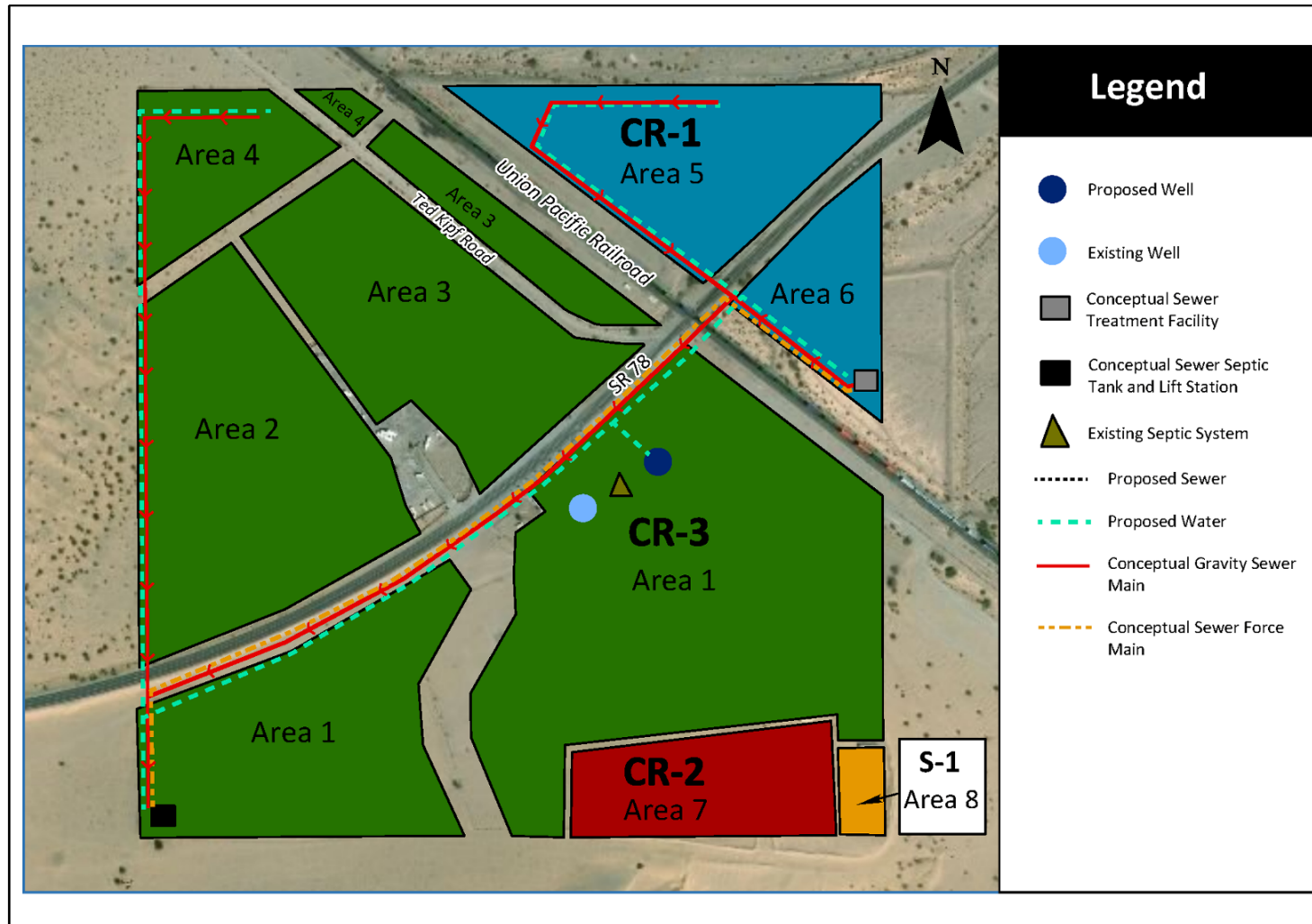
SOURCE: The Altum Group, 2020

Conceptual Intersection Plan
Glamis Specific Plan
Figure 8



SOURCE: The Altum Group, 2020

Conceptual Grading and Drainage
Glamis Specific Plan
Figure 9



SOURCE: The Altum Group, 2020

Conceptual Water and Sewer Plan
Glamis Specific Plan
Figure 10

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH SVCS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OFFICE EMERGENCY SERVICES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
APCD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SHERIFF DEPARTMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ICPDS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Jim Minnick, Director of Planning/EEC Chairman

Date:

PROJECT SUMMARY

Project Location

The Specific Plan Area is located in the unincorporated community of Glamis, a remote area in the central portion of Imperial County. The project site is located approximately 27 miles east of the City of Brawley; approximately 27 miles east of the City of Brawley; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea (**Figures 1 and 2**). The Project site is located in Section 33, Range 18 East, Township 13 South within the U.S. Geological Survey (USGS) Glamis, California 7.5-minute topographic quadrangle (Assessor Parcel Numbers [APNs] 039-310-017, 039- 310-022, 039-310-027, 039-310-023, 039-310-029, 039-310-026, and 039-310-030).

Project Summary

The Specific Plan Area is contained within the County's designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The GSPA allows for the development of a Specific Plan in accordance with the design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. The proposed Glamis Specific Plan (GSP) would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities (Imperial County General Plan Land Use Element 2015).

Environmental Setting

The Planning Area is located on private land that is directly adjacent to the ISDRA and the NADW in an unincorporated area of Imperial County. The Planning Area contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store (**Figure 6, Project Site**). The Planning Area includes seven project parcels. The Specific Plan Area is regionally accessible via SR-78 (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists and bisects the area in a general east-west direction. Ted Kipf Road, a County-maintained dirt road serves as a secondary form of vehicular access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The Planning Area is also traversed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the Specific Plan Area and Wash Road which parallels the UPRR south of SR-78.

General Plan Consistency

The Project is located within the unincorporated area of Imperial County. The existing General Plan land use designation is " Glamis Specific Plan Area." The existing zoning for the majority of the Planning Area is Open Space/Preservation (S-2) and a very small area is designated General Commercial (C-2). The GSP would consist of eight proposed Planning Areas. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3). Planning Areas 5 and 6 are proposed for designation as Commercial-Recreation 1 (CR-1). Planning Area 7 is proposed for designation as Commercial-Recreation 2 (CR-2). Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation.

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a) Less than Significant. Visual Impact Assessment (VIA) was prepared for the Specific Plan in March 2020 (Altum Group, 2020). The VIA found that no designated scenic vistas as identified by the County are located within visible distance of the Specific Plan Area. Per the List of Officially Designated County Scenic Highways from Caltrans, the Specific Plan Area is not located along a County designated scenic route. The Specific Plan Area is located in a relatively flat area and does not have any rock outcroppings and contains very few trees. The Specific Plan Area, as viewed from multiple vantage points, is already developed with commercial and infrastructure uses. The southwest portion of the Specific Plan Area contains an existing RV Storage facility, directly northwest of the Glamis Beach Store. The SR-78 and the UPRR bisect each other, running northeast and northwest respectively. The Specific Plan Area is bordered by the ISDRA to the south, the NADW to the west, and BLM land to the north and east. Immediate surrounding views from the project site consist of the NADW to the northwest, and the Chocolate Mountains Aerial Gunnery Range to the north and east. The NADW is managed by the Bureau of Land Management (BLM) as Visual Resource Management (VRM) Class I. VRM Class I objectives are to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. None of the activities associated with implementation of the specific plan would occur on the NADW or on BLM lands, thus, the proposed project would not result in a substantial adverse effect on a scenic vista and a less than significant impact would occur. While impacts to scenic vistas are anticipated to be less than significance, this impact will be analyzed in the EIR.

b) Less than Significant. According to the California Scenic Highway Mapping System (Caltrans, 2020), within Imperial County a portion of SR -78, between the Anza Borrego State Park Road and SR-86 near Salton City, is eligible for designation as a state scenic highway. However, that portion of SR-78 within the Specific Plan Area

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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and its immediate vicinity is not designated as a state scenic highway nor is it eligible for designation. The Specific Area is not located along a County designated scenic route. The Specific Plan Area does not contain any rock outcroppings and has very few trees. According to the Class III Cultural Resources Inventory Report prepared for the Specific Plan, the Glamis Beach Store is not considered a historical resource (ASM Affiliates, 2019). As such, implementation of the Specific Plan is not anticipated to substantially damage scenic resources. Impacts would be less than significant and this issue will be discussed in the EIR.

c) Less than Significant. The Specific Plan Area is rural in character with a few visual encroachments, including existing commercial and residential structures, a wireless communications tower, and railroad infrastructure. It is located in an area that has been extensively used by OHVs due to the recreational nature of the NADW and ISDRA that surrounds it. The Specific Plan's Conceptual Open Space and Recreational Plan provides for the inclusion of open space within Planning Areas 1, 2 and 3 to preserve their existing open space character. The Specific Plan also recommends that new structures be sited to provide public views from SR-78, Ted Kipf Road and other publicly accessible vantage points. Implementation of the Specific Plan is not anticipated to substantially degrade the existing visual character or quality of public views of the Specific Plan Area or its surroundings. Using BLM Visual Resources Inventory (VRI) classes system, the EIR will evaluate changes to visual character or quality of public views from implementation of the Specific Plan.

d) Less than Significant. Implementation of the Specific Plan is not expected to create a substantial new source of nighttime lighting or day-time glare and would provide external safety lighting for both normal and emergency conditions at the primary access points. Lighting will be designed to provide the minimum illumination needed to achieve safety and security in the and will be downward facing and shielded in order to focus the illumination in the immediate area. Additionally, Specific Plan implementation activities would be required to comply with Imperial County Ordinance 90301 which regulates glare, outdoor lighting, and night sky protection. All lighting associated with implementation of the Specific Plan will be subject to County approval and compliance with Imperial County Requirements (Altum Group 2020). Therefore, implementation of the Specific Plan is anticipated to result in less than significant lighting impacts and this issue will be addressed in the EIR.

The Specific Plan includes the development of solar arrays and solar generating facilities as a permitted use to provide onsite power to the Glamis area. Although there would be some level of potential reflectivity from the operation of solar panels, upon final design, solar panels would be selected that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands. Solar arrays would be designed to not orient the panels towards any known air travel routes for private, commercial, or military airplanes. A full glint/glare analysis will be completed and potential impacts will be analyzed in the EIR.

II. AGRICULTURAL AND FOREST RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air 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?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a) No Impact. According to the 2016 Farmland Mapping and Monitoring Program Map for Imperial County, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (California Department of Conservation 2016a)). No impacts related to the conversion of FMMP farmlands to non-agricultural use would occur. This environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. The existing General Plan land use designation is " Glamis Specific Plan Area" and the existing zoning is Open Space/Preservation (S-2) and Medium Commercial (C-2). Agricultural uses are not allowed in the C-2 zone. While the storage of agricultural products and other agricultural activities are an allowable use within the S-2 Zone, there are no agricultural activities ongoing with the Specific Plan Area. Additionally, the Specific Plan Area is not covered under a Williamson Act contract (California Dept. of Conservation, 2016b). For these reasons, the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

c) No Impact. Neither the Specific Plan Area nor surrounding areas are used for timber production or are defined as forest lands. The proposed project would not conflict with any zoning designations designed to preserve timber

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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or agricultural resources. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

d) No Impact. There are no existing forest lands either on-site or in the immediate vicinity of the Project Area. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur under this threshold. This environmental parameter is not proposed for further analysis in the EIR.

e) No Impact. The proposed project does not include changes in the existing environment which, due to their location or nature, would result in the conversion of neighboring farmland to non-agricultural use. The Specific Plan Area is surrounded by open desert and the nearest agricultural lands occur approximately one mile to the north, across State Route 86/Highway 86. The proposed project would not result in the conversion of farmlands off-site to non-agricultural uses. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

III. AIR QUALITY.

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

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a) Potentially Significant Impact. The Specific Plan Area is located within the jurisdiction of the Imperial County Air Pollution Control District, in the Salton Sea Air Basin (SSAB). The SSAB is classified by the State as a nonattainment area for ozone (O3) as well as a nonattainment area for the State standards pertaining to particulate matter less than 10 microns (PM10). In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard.

Project construction activities would generate ozone precursor (i.e., oxides of nitrogen [NOX] and reactive organic gases [ROG]) emissions as well as CO, PM2.5, and PM10 emissions that could result in significant impacts on regional air quality. Emissions sources would include heavy equipment used for excavation and grading, cranes, tractors, loaders, backhoes, pavers and on-road motor vehicles for equipment and material deliveries as well as construction workers' vehicles. Specific Plan implementation activities (Camp RZR, etc.) are other emissions

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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sources. Grading and activities on unpaved roads would contribute to fugitive PM10 and PM2.5 emissions. These impacts could be potentially significant. Further analysis of air quality impacts is warranted to determine whether the project would conflict with or obstruct implementation of the applicable plans for attainment and, if so, the reasonable and feasible mitigation measures that could be adopted to reduce such impacts. These issues will be evaluated in the EIR.

b) Potentially Significant. SSAB is classified by the State as a nonattainment area for ozone (O3) as well as a nonattainment area for the State standards pertaining to particulate matter less than 10 microns (PM10). In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard.

ICAPCD rules and regulations would apply to all cumulative project activities within the SSAB. Construction emissions will be analyzed in the EIR as well as short- and long-term emissions from implementation of the Specific Plan. Cumulative contributions of emissions to the SSAB would be considered potentially significant and will be evaluated further in the EIR.

c and d) Potentially Significant. At present, the Specific Plan Area does not contain a substantial number of persons or sensitive receptors. Construction and operational activities would result in fugitive dust and diesel exhaust and emissions that could adversely affect air quality and/or be a source of odors. Mitigation measures recommended by the ICAPCD for diesel equipment and dust control will be evaluated as part of the EIR to avoid or reduce impacts; however, these impacts are considered potentially significant and will be evaluated in the EIR.

IV. BIOLOGICAL RESOURCES.

Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input 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"/>

Discussion:

a) Potentially Significant Unless Mitigation Incorporated. The Project has the potential to adversely affect candidate, sensitive, or special status species including flat-tailed horned lizard (FTHL) (Barrett Biological 2019). FTHL could potentially occur within the softer sands (within and around the washes, and along the roadsides) in the creosote bush scrub on-site. There is an abundance of prey (ants) that could support FTHL presence. There is potential that there would be direct and/or indirect impacts to this species if construction occurs during the active period of mid-February to mid-November. Ground disturbance from heavy equipment, which may potentially impact the FTHL, would be considered significant and would require mitigation.

b) No Impact. There is no riparian habitat found on site, therefore this project will not have a substantial adverse effect on any riparian habitat.

c) No Impact. A stormwater channel runs through a small portion of the northeast which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes were observed on site. It is recommended that the ACOE and CDFW be consulted to determine permitting requirements (Barrett Biological 2019). There are no wetlands found on site; therefore this project will have no impact 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.

d) Less Than Significant Impact. This project is in a predominately developed and fenced community. The Site is bisected on by SR-78, Ted Kipf Road and Union Pacific railroad and as a result of these existing barriers, the projects will not interfere substantially with the currently restricted movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Thus, the impact would be less than significant.

e) Potentially Significant Unless Mitigation Incorporated. The Imperial County General Plan Open Space and Conservation Element (County of Imperial 2016) contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. As noted above, implementation of the Specific Plan has the potential to result in significant impacts to candidate, sensitive, or special status species, and washes and ephemeral streams. Such impacts could conflict with Open Space and Conservation Element and are considered potentially significant.

f) No Impact. The Specific Plan is not located within an area that is subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. CULTURAL RESOURCES.

Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a, b, and c) Potentially Significant Impact. A Phase III Cultural Resources Inventory Report was prepared for the Specific Plan by ASM Affiliates in July 2019(ASM Affiliates, 2019). A total of approximately 141 acres was subject to 100 percent intensive Class III pedestrian survey. Prior to the survey, a cultural resources records search was completed at the South Coastal Information Center (SCIC) of the project area of potential effect (APE). Seven cultural resources were identified within the APE. Three of these were discovered during survey while the remaining four were previously recorded. A single isolated prehistoric artifact was identified within a disturbed context, while historic cultural resources include refuse deposits, roads, a railroad, and a cemetery.

Project-related ground disturbing activities could cause a substantial adverse change in a historical or archaeological resource. Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. Therefore, a potentially significant impact is identified for these resources. The findings of the cultural resources report will be included in the EIR analysis.

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"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

Discussion:

a) Less Than Significant. The existing use requires diesel generators to supply power. These generators would be phased out once the project has been connected to a constant electricity source. Upgrades to the electrical system could include construction and installation of a power line (transmission line and/or distribution line) by Imperial Irrigation District (IID) to extend power from the nearest substation (approximately 7.2 miles to the northeast). A second and potentially more viable option would be to develop a small commercial solar photovoltaic (PV) system, with a backup battery storage component or another green power system. A third option may be wind generation. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would occur. This is considered a less than significant impact and will be further evaluated in the EIR.

b) No Impact. Implementation of the Specific Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impacts would occur under this criteria.

VII. GEOLOGY AND SOILS.

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994),	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
creating substantial direct or indirect risks to life or property?				
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a.1) Less Than Significant Impact. The Specific Plan is located in southern California, an area known to be geologically active and which is subject to seismic events. The project site does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone. Well-delineated fault lines cross through this region as shown on California Geological Survey [CGS] maps; however, no active faults are mapped in the immediate vicinity of the site. Therefore, active fault rupture is unlikely to occur at the project site. While fault rupture would most likely occur along previously established fault traces, future fault rupture could occur at other locations. Aerial photographs from 1961 to 2016 were reviewed and no naturally occurring lineaments were observed within or adjacent to the site. Anthropogenic lineal features associated with drainage control are common in the site vicinity (Earth Systems Pacific 2019). Thus, there would be a less than significant impact from rupture of a known earthquake fault.

a.2) Less Than Significant Impact Approximately 15 active faults or seismic zones lie within 70 miles of the Specific Plan area. The primary seismic hazard to the site is strong ground shaking from earthquakes along regional faults including the Brawley and Imperial faults. The Brawley segment of the San Andreas fault is located approximately 24 miles west of the site. The Imperial segment of the San Andreas fault is located approximately 27 miles west of the site. The site is located within a very active seismic area in southern California where large numbers of earthquakes are recorded each year. Approximately 31 magnitude 5.5 or greater earthquakes have occurred within 60 miles of the site since 1852. Significant local Imperial Valley earthquakes have included the 1940 Imperial Valley (6.9), 1942 Fish Creek Mountains (6.6), 1968 Borrego Mountain (6.6), 1979 Imperial (6.4), 1987 Elmore Ranch and Superstition Hills (6.6), and 2010 Baja (7.2) earthquakes (Earth Systems Pacific 2019).

Most of the historic earthquakes have occurred along segments of the San Jacinto fault or Brawley seismic zone which produces very regular ground shaking of low (magnitude 1) to higher magnitude as described above. Ground shaking which may be tolerable from a structural design perspective, can have psychological effects that need to be understood by buyers and users of the site (Earth Systems Pacific 2019).

While accurate earthquake predictions are not possible, various agencies have conducted statistical risk analyses. In 2013, the CGS and the United States Geological Survey [USGS] presented new earthquake forecasts for California (USGS UCERF3). The recent Working Group of California Earthquake Probabilities estimated a 35 to 41 percent conditional probability that a magnitude 6.7 to 7.0 or greater earthquake may occur in 30 years (2014 as base year) along the nearby Coachella segment of the San Andreas fault, 37 to 45 percent for the Brawley

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
<p>seismic zone, 30 to 41 percent for the Imperial fault, and about 5 to 7 percent for the San Jacinto (Superstition Hills section) fault. The revised estimate for an 8+ magnitude earthquake along the local San Andreas fault is about 7%. The primary seismic risk at the site is a potential earthquake along the Brawley seismic zone and San Andreas, San Jacinto, and Imperial faults that are northwest and west of Glamis. Geologists believe that the San Andreas fault has characteristic earthquakes that result from rupture of each fault segment. The estimated characteristic earthquake is magnitude 8.1 for a multi-segment San Andreas rupture event. The San Jacinto fault is historically be one of the most active faults in southern California, especially in the southern Imperial Valley and San Jacinto Valley. Multi-segment magnitudes for a San Jacinto fault rupture is approximately 7.9. A geotechnical report was prepared for the Project (Earth Systems Pacific 2019) and will be discussed in the EIR.</p> <p>a.3 and a.4) Less Than Significant. Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. Liquefaction describes a phenomenon in which saturated soil loses shear strength and deforms as a result of increased pore water pressure induced by strong ground shaking during an earthquake. Dissipation of the excess pore pressures will produce volume changes within the liquefied soil layer, which can cause settlement. Shear strength reduction combined with inertial forces from the ground motion may also result in lateral migration (lateral spreading). Factors known to influence liquefaction include soil type, structure, grain size, relative density, confining pressure, depth to groundwater (typically occurs in the upper 50 feet), and the intensity and duration of ground shaking. Soils most susceptible to liquefaction are saturated, loose sandy soils and low plasticity clay and silt. Groundwater depth at the project site is more than 50 feet below the ground surface and therefore liquefaction potential is low. (Earth Systems Pacific 2019).Due to the flat topography of the site the potential for a landslide is very low. Thus, the impact would be less than significant.</p> <p>Non-seismic hazards within the Specific Plan area will be addressed in the EIR.</p> <p>b) Potentially Significant Impact. The proposed Project would result in changes to the current topography because of grading and site preparation activities. Although these changes will be designed to meet stringent regulatory requirements, there is a potential for soil erosion, loss of topsoil, and geologic instability. The EIR will evaluate these potentially significant adverse impacts.</p> <p>c) Less Than Significant Impact. As discussed in c. 3 and 4, the proposed project risk for on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse are expected to be less than significant. These issues will be addressed in the EIR.</p> <p>d) Less Than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported-on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, expansive soils can have a detrimental effect on structures. Site soils were observed to be granular however clayey zones could be present. As such, the Expansion Index of the onsite soils is anticipated to be “very low” for granular soils, and if encountered, could be medium to high for clayey soils as defined by ASTM D 4829. Samples of building pad soils</p>				

Imperial County Planning & Development Services Department

Draft Initial Study, Environmental Checklist Form for the Glamis Specific Plan Project

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Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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should be observed or tested during grading to confirm or modify these findings (Earth Systems Pacific 2019). The EIR will evaluate the potential impacts related to expansive soils.

e) No Impact. Soils in the Specific Plan Area currently support the existing septic system and leach field that provide the small amount of wastewater needed for Glamis Beach Store employees. This same infrastructure would be used for the proposed Project. No impacts are expected.

f) Less Than Significant Impact.

Previous geologic mapping reports indicate that the study area is immediately underlain by "Pleistocene nonmarine sedimentary deposits." Although in most cases Pleistocene sedimentary deposits are typically assigned an undetermined paleontological potential, the observation of probable Holocene-age undissected alluvial deposits on-site during the paleontological field survey supports a low paleontological potential rating for the sedimentary deposits underlying the Project site. In addition, the artificial fill present in previously graded portions of the Project site has no paleontological potential. Given the no-to-low paleontological potential of the deposits present on the Project site, it is unlikely that their disturbance by earthwork related to future development within the Project site will result in negative impacts to paleontological resources (San Diego Natural History Museum 2019). Thus, potential impacts to paleontological resources would be less than significant.

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

Discussion:

a) Potentially Significant. Greenhouse gases (GHGs) emitted by human activity are implicated in global climate change or global warming. The principal GHGs are Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), and Fluorinated Gases. The transportation sector (e.g., on-road motor vehicles, off-highway vehicles, aircraft) is the single largest source of GHG emissions and accounts for one-half of GHG emissions globally. Short-term greenhouse gas emissions from construction could come from construction equipment, construction support vehicles, material truck trips, and worker vehicle trips. Long-term emissions would come from combustion of natural gas and diesel fuel (producing greenhouse gas emissions of CO₂ and CH₄), as well as from fugitive emissions (a component of fugitive emissions is methane). Indirect emissions associated with electrical generation and with worker and truck transportation offsite could also result. An air quality and greenhouse gas emission analysis will be prepared for the Project and potentially significant impacts related to GHG emissions will be addressed in the EIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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b) Potentially Significant. The Specific Plan would be considered to have a significant impact if it would be in conflict with State plans, policies or regulations adopted for the purpose of reducing GHG emissions. GHG emissions and the Specific Plan's consistency with applicable GHG plans, policies, and regulations will be evaluated in the EIR.

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan 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 Specific Plan 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 checked="" type="checkbox"/> | <input 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"/> |

Discussion:

a) Less Than Significant. The Specific Plan Area is characterized as an area of open desert consisting of several adjoined one and two story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store. Additionally, there is a separate seasonal OHV repair

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business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower is located at the southeast portion of the property. Due south is a single family residence, large recreational vehicle storage garage, and other related equipment storage buildings. Additionally, a dilapidated pre-fabricated residential structure is located on the southeast corner of the project site. To the west, on the opposite side of the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Lastly, on the northeast side of the GSP, crossing the Union Pacific Railroad, there are two triangular parcels that are currently vacant. The proposed project would not require the limited transport, storage, and use of fuels, polymer-based sealants, and other fluids for the fueling/servicing of construction equipment. These practices are already in place for current operations and the Project would not substantially increase the transport or use of hazardous materials above current levels.

Transportation, storage, and disposal/recycling of such products are extensively regulated at the local, state and federal levels. Current and future construction and operations are, and will be, required to be in compliance with these regulations. The current inventory of chemicals on site are not expected to increase markedly as a result of the proposed project. Because operations would be similar to current operations, impacts would be less than significant and will be evaluated in the EIR.

b) No Impact. Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site and is not listed on the Cortese Knox list. According to the State Water Resources Control Board, there are no Underground Storage Tanks in the vicinity of the landfill. This environmental parameter is not proposed for further analysis in the EIR.

c) No Impact. Implementation of the Specific Plan would not emit hazardous emissions, handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school (Magnolia Union Elementary School) is located 21 miles west of the Project site. No impacts would occur, and this environmental parameter is not proposed for further analysis in the EIR.

d) No Impact. Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site. No impacts would occur, and this environmental parameter is not proposed for further analysis in the EIR.

e) No Impact. The Project is not located within the Airport Land Use Compatibility Plan for Imperial County Airports (County of Imperial, 1996) or within two miles of a public airport or public use airport. The nearest public use airport, Holtville Airport, is located 14 miles southwest the project vicinity. For these reasons, the proposed project would not result in a safety hazard or expose people residing or working in the area to excessive noise levels. No impacts have been identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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f) Potentially Significant Impact Unless Mitigation Incorporated. Implementation of the Specific Plan would generate construction trips and the potential for temporary roadway lane closures during construction of proposed traffic improvements, which could temporarily affect an emergency response or evacuation plan. This impact is considered potentially significant and will be addressed in the EIR.

g) Less than Significant. The Project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial, n.d.). This is considered a less than significant impact and will be addressed in the EIR

X. HYDROLOGY AND WATER QUALITY.

Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would: | | | | |
| 1) Result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

a) Potentially Significant. A stormwater channel runs through a small portion of the northeast section of the Specific Plan which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes also occur within the Specific Plan Area (Barrett Biological 2019). Potential discharges could be wastewater generated by the Glamis Beach Store, restaurant and bar which is currently being discharged into an existing septic tank located near to those buildings and potential discharges related to the water and wastewater treatment systems.

Future wastewater treatment needed (i.e., secondary and tertiary treatment) will be determined by the amount of wastewater forecasted to be generated by each phase of structural improvement. Free groundwater was not encountered in borings or test pits during explorations conducted in January of 2019. Boring depths exceeded 50 feet from the ground surface. Moisture contents observations of the soils indicate the soils are dry to moist. By definition, perched ground water conditions were not observed during exploration. Observations did not indicate “wet” soils meaning free water was noted on the soil. Impermeable type soils (generally clay) were not found at depths ranging from the ground surface to 50 feet bgs. Moisture contents performed in the lab indicated values between 1 percent and 9 percent, which indicates degrees of saturation less than approximately 50 percent (Earth Systems Pacific 2019). Thus, the introduction of these materials into groundwater resources through percolation or inundation would result in less than significant water quality impacts. Impacts to water quality could also occur through sedimentation of local runoff associated with erosion, and the discharge of substances indirectly related to Project construction or operation (e.g., diesel or automobile fuels).

The potential to create substantial erosion and siltation or violate any water quality standards or waste discharge requirements is considered significant and will be discussed in the EIR.

b) Less than Significant. Non-potable water for the existing RV Park and Glamis Beach Store is provided via an existing on-site water well, which would be modified as part of the Specific Plan’ implementation. A water supply assessment for the Project is being prepared and would evaluate potential impacts to water resources. Potential impacts to groundwater resources are expected to be less than significant and will be addressed in the EIR.

c.1), c.2) and c.3) Less Than Significant Impact. A stormwater channel runs through a small portion of the northeast which is channeled under the railroad track. On the southeast portion, a wash is piped under SR 78. Several established washes and ephemeral washes were observed on site (Barrett Biological 2019). According to the Conceptual Drainage and Grading Plan Element of the Specific Plan, the existing topography and drainage of the project site generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the project site (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR. The drainage flows from these three concrete culverts underneath the UPRR, flow through and/or around portions of the existing project site (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All planning areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

Grading for the proposed project would provide flood protection for future land uses within the entire project site and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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consistent with California drainage law. The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-direct the drainage around each of the planning areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for planning area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR 78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the Southwest under the UPRR, via existing concrete culverts. Drainage impacts are anticipated to be less than significant and will be addressed in the EIR.

d) Less Than Significant Impact. A small water storage tank and basin are located approximately 4 miles northeast and upgradient of the project, associated with mining activities. In the event of tank rupture or basin failure due to seicheing, there is a remote possibility of some flooding within the defined drainages of the alluvial fan, although it appears, that any runoff would trend southerly of the Specific Plan Area, depending on localized drainage courses and man-made modifications to drainage paths.

The Specific Plan lies within two designated FEMA Flood Zones: A and X Zone “A” is defined as “Without Base Flood Elevation” and Zone “X” is defined as “Areas of 0.2% annual chance floodplain; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood.” These zones are defined on FEMA Map Number 06025C1125C and 06025C1475C both effective 9/26/2008. The project site is in an area where sheet and concentrated flow and erosion could occur. Appropriate project design by the civil engineer, construction, and maintenance can minimize the sheet flooding potential (Earth Systems Pacific 2019).

The site is far inland, so the hazard from tsunamis is non-existent.

Potential impacts from floods and seiches would be less than significant.

e) Less than Significant. The Project site located within the Ocotillo-Clark Valley Groundwater Basin (Basin Number 7-25), as defined by the California Department of Water Resources. The Ocotillo-Clark Valley Groundwater Basin does not fall within the basin classification that requires implementation of a sustainable groundwater management plan (also known as a groundwater sustainability plan, or GSP, under the Sustainable Groundwater Management Act definitions). However, in April 2017 the County amended a comprehensive Groundwater Management Ordinance to preserve, protect and manage groundwater resources. The Groundwater Ordinance, codified as Division 22 of Title 9 of the Imperial County Code, aims to avoid or minimize impacts on existing and proposed groundwater extraction activities and groundwater resources. The Groundwater Ordinance requires that existing extraction facilities be permitted and registered with the County. New extraction facilities must also obtain a permit from the County. The Project would apply for an extraction permit for the new well, in compliance with the Groundwater Ordinance, and less than significant impacts are expected. These issues will be evaluated in the EIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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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"/> |
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

a) No Impact. Implementation of Specific Plan would not divide an established community. No impact would occur.

b) No Impact. The Specific Plan Area is contained within the County's designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The proposed Glamis Specific Plan (GSP) would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities (Imperial County General Plan Land Use Element). Thus, the proposed project would be consistent with the County's General Plan Land Use Element and there would be no impact.

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

a, b) No Impact. A number of mineral resources are currently being extracted in Imperial County including gold, gypsum, sand, gravel, lime, clay, stone, kyanite, limestone, sericite, mica, tuff, salt, potash, and manganese. According to the Existing Mineral Resources Map (Figure 8) in the Conservation and Open Space Element of the County of Imperial General Plan (2016), no known mineral resources occur within the Project vicinity nor are there any mapped mineral resources within the boundary of the Project site (County of Imperial, 2016). Thus, no impacts related to the loss of availability of a known mineral resource would occur.

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

Would the project result in:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input 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"/> |

Discussion:

a and b) Potentially Significant. Construction activities for Specific Plan activities could result in temporary or periodic increases in noise and groundborne vibration. Construction activities include site preparation and soil compaction; roadway improvements/paving, pipeline trenching, etc. Operation activities could result in short- and long-term increases in noise vibration. Although implementation of the Specific Plan t is not expected to expose people to excessive noise or vibration levels, further analysis is warranted, and impacts are considered potentially significant. A noise report will be prepared for the Project and included in the EIR.

c) No Impact. The proposed project is not located within the vicinity of a private airstrip and the nearest privately-owned/public use airport, Salton Sea Airport, is located 13 miles northwest the Project Site. Additionally, the Project is not located within the Imperial County Airport Land Use Compatibility Plan (County of Imperial, 1996). For these reasons, the Project would not expose people residing or working in the area to excessive noise levels; therefore, no impact would occur.

XIV. POPULATION AND HOUSING.

Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

a) Potentially Significant Unless Mitigation Incorporated. The proposed project could result in a seasonal population growth (October through May) through the expansion of commercial and recreational activities within the Specific Plan Area. These activities would result in the development of new businesses and would require employee housing to be constructed. The proposed project allows for some limited permanent residential land uses within the project site, which consist mostly of employee housing. The proposed zoning changes allow for the development of condominiums. Thus, the proposed project could result in significant impacts from unplanned population growth, however, this population growth would be seasonal (October through May).

b) No Impact. There are no year-round residents within the Specific Plan Area. The proposed project would not result in the demolition of existing housing or result in the displacement of any residents.

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 public services:

Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

Fire and Police) Potentially Significant Impact Unless Mitigation Incorporated. Fire protection services are provided to the Specific Plan Area by the County of Imperial Fire Department through the Brawley Fire Department Station, located in the City of Brawley approximately 25 miles to the east. There are existing fire hydrant connections within the "Vendor Row" area. Additional connections would be installed, as necessary to meet the needs of the GSP. During Special Events, onsite fire protection would be provided with applicable fire protection services and apparatus.

The County of Imperial Sheriff's Department provides law enforcement to the GSP planning area. Sheriff's officers that patrol the area are based at the Brawley Police Department in the City of Brawley located approximately 27 miles east of the GSP planning area. During Special Events, on-site law enforcement will be provided with applicable services and apparatus.

The County of Imperial has a Development Impact Fee (DIF) which is authorized by County of Imperial Ordinance No. 4.32. This fee is applied to all development projects in incorporated and unincorporated County of Imperial land. Payment of the DIF is required of developers to fund public facilities such as fire protection facilities and sheriff facilities. As the GSP is developed, DIF fees will be required to ensure that resources will be available for capital improvements to implement the County's capital and operational funding of future facilities. Potential impacts on fire and police services could be potentially significant and will be evaluated in the EIR.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Schools, Parks, and Other Public Facilities) No Impact. Implementation of the Specific Plan would not include the provision of, or the need for, new schools, parks or other public facilities. The proposed project would not result in new long-term housing. Any new housing would be for employees of the new businesses and would be seasonal only. There would not be a permanent increase in the population. Because the Project would not result in a substantial increase in population, it does not require additional schools, parks, or other public facilities beyond that which already exists. No physical impacts related to the provision of schools, parks, or other facilities would occur.

XVI. RECREATION.

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

a, and b) No Impact. There are no existing neighborhood or regional parks within the Specific Plan Area. The ISDRA is located south of the Specific Plan Area. The proposed project would create a distinctive master-plan for recreation-serving land uses which are consistent with the historical use of the Glamis area and the ISDRA. However, it would not serve to increase visitation to the ISDRA. Thus, there would be no impact on existing neighborhood and regional parks or other recreational facilities. The proposed project would provide an opportunity for a variety of recreational activities to complement the established "Glamis" sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as OHV training, OHV rentals, etc.), amusement facilities, Desert Tours (off road experience), racetrack, park/playground/picnic area, and other recreational-based activities. However, construction of these facilities would be within the footprint of the Specific Plan Area and no adverse impacts to the environment would occur.

XVII. TRANSPORTATION / TRAFFIC.

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"/> |
| b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
intersections) or incompatible uses (e.g., farm equipment)?				
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a) Less than Significant. Implementation of the Specific Plan is anticipated to be consistent with the County of Imperial General Plan and is not anticipated to conflict with a program, plan, ordinance or policy addressing roadway, transit, bicycle or pedestrian facilities. Implementation of the Specific Plan would increase the number of vehicle trips in the area and the number of on-site personnel. However these increases are not expected to be substantial. Project conflicts with applicable programs, plans, ordinance or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities will also be addressed in the EIR.

b) Less Than Significant. A transportation impact analysis (TIA) will be prepared for the Glamis Specific Plan to determine and evaluate traffic impacts on the local circulation system due to implementation of the Specific Plan. In compliance with Senate Bill 743 (SB 743) and CEQA Section 15064.3b, the TIA will also include an assessment of project-related changes in vehicle miles traveled compared to existing conditions and the findings presented in the EIR.

c) Less Than Significant Impact. The Specific Plan contains a Conceptual Circulation Plan that identifies vehicle and pedestrian access points and proposed roadway improvements including installation of a new crossing of SR-78 and installation of a traffic signal (See Figure 7, Conceptual Circulation Plan). The proposed intersection may be signalized and will provide access to the Planning Areas north and south of SR-78 (See Figure 8, Conceptual Intersection Plan). A potential OHV and pedestrian undercrossing or overcrossing is also identified for SR-78. The planned improvements will be designed to be consistent with the Imperial County Circulation Element. Design features that would result in transportation-related hazards or safety concerns are not anticipated. However, impacts related to increased hazards could be potentially significant and will be addressed in the EIR. A traffic study is being prepared and will be used to analyze potential impacts in the EIR.

d) Potentially Significant. Implementation of the Specific Plan would generate construction trips and the potential for temporary roadway lane closures exists. It is anticipated that emergency access would be maintained at all times, and appropriate detours would be provided, as necessary. Nonetheless, impacts related to emergency access are considered potentially significant and will be addressed in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES.

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

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

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a) and b) Potentially Significant. As required by SB 18 and AB 52, the Imperial County Planning and Development Services Department sent consultation notices to Native American tribal representatives regarding the proposed Project. Specifically, AB-52 Consultation notices were sent to the Quechan and Torres-Martinez Desert Cahuilla Indian Tribes. SB-18 Consultation Letters were sent to the tribes/tribal representatives listed below:

- Augustine Band of Cahuilla Mission Indians
- Campo Band of Mission Indians
- Chemehuevi Reservation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Ewiiapaayp Tribal Office
- Fort Yuma-Quechan Indian Tribe
- Internal Tribal Cultural Resource Protection Council
- Kumeyaay Cultural Repatriation Committee
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Torres-Martinez Desert Cahuilla Indians,
- Native American Heritage Commission,
- Kwaaymii Laguna Band of Mission Indians

As of the date of this Initial Study, no Tribes have requested consultation. Results of any Native American consultation will be included in the EIR. As discussed under Response to Item V. Cultural Resources, implementation of the Specific Plan could have potentially significant impacts to archaeological resources, which could be considered a significant resource to a California Native American tribe.

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- | | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
development during normal, dry and multiple dry years?				
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

Discussion:

a) Potentially Significant Impact. The Specific Plan would include the expansion of existing water and wastewater facilities along with the development of additional infrastructure to properly accommodate the large volume of visitors to the Specific Plan Area. The GSP will allow for the development of utility buildings, utility substation(s), and water/wastewater treatment facilities. The proposed project would also allow for the development of a solar energy generation facilities (including battery storage) located throughout the Specific Plan Area as well as the addition of a 7.2 mile long electrical transmission / distribution line to bring power to the Specific Plan Area. The Conceptual Drainage and Grading plan would provide flood protection for future land uses within the entire Specific Plan Area and release the drainage to the southwest. Construction of the infrastructure improvements could cause significant environmental effects which will be addressed in the EIR.

b) Potentially Significant Impact Unless Mitigation Incorporated. Currently two wells provide water to the Specific Plan Area and additional water is trucked in during periods of high visitation such as Camp RZR. The proposed project would include a CUP for modification of the existing well. An SB-610 Water Supply Assessment will be prepared to assess the impact to water supplies in the Specific Plan Area. This issue will be addressed in the EIR.

c) Potentially Significant Impact. Wastewater treatment for the existing Specific Plan Area is provided by an on-site septic system and leach field. Implementation of the Specific Plan would result in the need for expanded wastewater treatment options. This issue will be addressed in the EIR.

d) Less than Significant Impact. Implementation of the Specific Plan would result in an increase in solid waste generation during construction and operation. Solid waste would be disposed of using a locally-licensed waste hauling service. It is anticipated that solid waste would continue to be hauled to the landfill nearest the Planning Area. The Salton City Solid Waste Site (13-AA-0011) is located at 935 W. Highway 86 Salton City, CA 92275. As of September 2018, this landfill had approximately 1,264,170 cubic yards of remaining capacity and was

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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estimated to remain in operation through 2038 (CalRecycle, 2019b). Solid waste generation associated with implementation of the Specific Plan will be addressed in the EIR.

e) No Impact. The Applicant will comply with federal, state and local statutes related to solid waste. No impacts would occur.

XX. WILDFIRE.

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

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

Discussion:

a) No Impact. According to the Draft Fire Hazard Severity Zone Map for Imperial County prepared by the California Department of Forestry and Fire Protection, the Specific Plan Area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). As noted under Hazards and Hazardous Materials (Response IX. f) the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

b) No Impact. The Specific Plan Area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

c) No Impact. The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that would

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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result in temporary or ongoing impacts to the environment. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

d) Less than Significant. The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would not 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 is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

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

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

SECTION III. MANDATORY FINDINGS OF SIGNIFICANCE

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

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a) Potentially Significant Impact. The EIR's biological resources section will discuss direct and indirect impacts on plants, fish and wildlife species. The EIR will also evaluate direct and indirect impacts on cultural and tribal cultural resources. Finally, the EIR will evaluate the Specific Plan's contribution to cumulative impacts, identify whether the contribution is cumulatively considerable, and propose feasible mitigation, as appropriate, to reduce such impacts to less-than-significant levels.

b) Potentially Significant Impact. The Project has the potential to contribute to cumulative impacts related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation and traffic, tribal cultural resources, and utilities and service systems. The EIR will evaluate the project's contribution to cumulative impacts in these areas as well as other areas as further impacts are identified.

c) Potentially Significant Impact. The Project could potentially result in environmental effects that have adverse impacts on human beings, either directly or indirectly. These impacts will be fully addressed in the EIR.

SECTION IV. PERSONS & ORGANIZATIONS CONSULTED/ REFERENCES

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Asst. Director of Planning & Development Services
- Patricia Valenzuela, Planner IV
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Agricultural Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- CDFW
- USFWS
- Caltrans

C. REFERENCES

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