



RECON

**Draft Mitigated Negative Declaration
for the Monte Vista Regional Soccer
and Wellness Park Project
El Centro, California**

Prepared for

City of El Centro
Community Development Department
1275 Main Street
El Centro, CA 92243

Prepared by

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RECON Number 9781
January 11, 2020

TABLE OF CONTENTS

Acronyms and Abbreviations	iii
1.0 Introduction	5
1.1 Project Needs and Objectives	5
1.2 Project Location and Setting	5
1.3 Project Description	6
2.0 Mitigated Negative Declaration.....	6
2.1 Authority to Prepare a Mitigated Negative Declaration.....	6
2.2 Results of Public Review	7
3.0 Mitigation Monitoring and Reporting Program.....	8
3.1 Air Quality	8
3.2 Biological Resources	9
4.0 Initial Study.....	15
I. AESTHETICS.....	19
II. AGRICULTURAL/FORESTRY RESOURCES	20
III. AIR QUALITY	22
IV. BIOLOGICAL RESOURCES	29
V. CULTURAL RESOURCES	31
VI. ENERGY.....	33
VII. GEOLOGY/SOILS	34
VIII. GREENHOUSE GAS EMISSIONS	38
IX. HAZARDS/HAZARDOUS MATERIALS.....	44
X. HYDROLOGY/WATER QUALITY	46
XI. LAND USE/PLANNING	49
XII. MINERAL RESOURCES	49
XIII. NOISE.....	50
XIV. POPULATION/HOUSING	54
XV. PUBLIC SERVICES.....	55
XVI. RECREATION.....	57
XVII. TRANSPORTATION.....	58
XVIII. TRIBAL CULTURAL RESOURCES	61
XIX. UTILITIES/SERVICE SYSTEMS.....	62
XX. WILDFIRE	64
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.....	66
5.0 References Cited.....	67

TABLE OF CONTENTS (cont.)

FIGURES

1:	Regional Location.....	11
2:	Project Location on USGS Map	12
3:	Project Location on Aerial Photograph.....	13
4:	Project Site Plan	14

TABLES

1:	Surrounding Land Uses.....	6
2:	Maximum Daily Construction Air Pollutant Emissions	25
3:	Maximum Daily Operations Air Pollutant Emissions	27
4:	Worst-case Project Greenhouse Gas Emissions (MT CO ₂ E per Year)	41
5:	Traffic Noise Levels Without and With Project (CNEL).....	51
6:	City of El Centro Noise Abatement and Control Ordinance Noise Level Limits	52
7:	Imperial County Property Line Noise Limits.....	53
8:	Regional VMT Per Employee and Threshold	59
9:	Project Feature VMT Adjustments.....	60
10:	VMT Per Employee Comparison	60

APPENDICES

A:	Air Quality Calculations
B:	Biological Technical Report
C:	Western Burrowing Owl Focused Survey
D:	Cultural Resources Report
E:	Greenhouse Gas Calculations
F:	Noise Calculations
G:	Traffic Impact Analysis

Acronyms and Abbreviations

AB	Assembly Bill
ADA	Americans with Disabilities Act
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	methane
City	City of El Centro
CO	carbon monoxide
CO ₂	carbon dioxide
dB(A)	A-weighted decibel
DPM	diesel particulate matter
General Plan	City of El Centro General Plan
GHG	greenhouse gas
GPA	General Plan Amendment
ICAPCD	Imperial County Air Pollution Control District
ICOE	Imperial County Office of Education
IID	Imperial Irrigation District
in/sec	inch per second
IVCEC	Imperial Valley Center for Exceptional Children
IWSP	Interim Water Supply Policy
L _{eq}	equivalent noise level
LLG	Linscott, Law & Greenspan, Engineers
LOS	level of service
MHFP	Multihazard Functional Plan
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MT CO ₂ E	metric ton carbon dioxide equivalent
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAF	Naval Air Facility
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PM ₁₀	particulates 10 microns or less in diameter
PM _{2.5}	particulates 2.5 microns or less in diameter
PPV	peak particle velocity
Project	Monte Vista Regional Soccer and Wellness Park
ROG	reactive organic gases
RPS	Renewables Portfolio Standard

RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SEMS	Standardized Emergency Management System
SIP	State Implementation Plan
SO _x	sulfur oxides
SP	service population
SYCL	South Yuma County Landfill
TAZ	Transportation Analysis Zone
TIA	Traffic Impact Analysis
U.S. EPA	United States Environmental Protection Agency
USDA	United States Department of Agriculture
USGS	United States Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle miles traveled

1.0 Introduction

1.1 Project Needs and Objectives

The Imperial County Office of Education (ICOE) is in the process of applying for Prop 68 Statewide Parks Program Grant. The grant would allow for the development of the Monte Vista Regional Soccer and Wellness Park (proposed project) located in the city of El Centro, California. The proposed project would develop approximately 63 acres within a larger approximately 73-acre parcel consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking, and a sustainable organic farm/orchard. The project would serve not only the city of El Centro but also the broader Imperial Valley region.

1.2 Project Location and Setting

The project site is located on the southeast corner of the intersection of West McCabe Road and Sperber Road in the city of El Centro. The regional location is identified in Figure 1. Figure 2 identifies the project location on a United States Geological Survey (USGS) map and Figure 3 identifies the project location on an aerial photograph. The project site is primarily in agricultural production at the current time. The project site lies between Imperial County (County) government facilities to the east and farmland to the south, west, and north. Parcels to the east, south, and west of the project site are located within the county of Imperial, while parcels to the north of the site are located within the city of El Centro.

The project site consists of active agricultural lands and water delivery network infrastructure (e.g., canals and drains). Elevation for the project ranges from minus 15 feet below mean sea level at the southwestern corner of the project area to minus 19 feet below mean sea level at the northeastern corner. Topography of the project area consists of leveled agricultural fields, a slightly raised roadbed for agricultural field access, raised interior canals, and raised banks of the Dahlia Canal Lateral 1. Predominant vegetation communities in the project area and vicinity consist of cultivated plants, non-native grasses, and saltbush (*Atriplex lentiformis*).

1.2.1 Surrounding Land Uses

Land uses surrounding the project site include the ICOE, the Imperial County Probation Department, the Imperial County Sheriff's Office, and the Imperial County Animal Control Office (east) and farmland (south, west, and north). Existing surrounding uses are further described in Table 1.

**Table 1
Surrounding Land Uses**

Location	Existing Use	City's General Plan Designation (County of Imperial General Plan Designation*)	Zone (County of Imperial Zone*)
North (City of El Centro)	Farmland	General Commercial and Low Density Residential	R1 (Single Family Residential) and CN (Neighborhood Commercial)
East (County of Imperial)	Imperial County Office of Education, Imperial County Probation Department, Imperial County Sheriff's Office, Imperial County Animal Control	Special Purpose Facility*	G/S (Government/Special)*
South (County of Imperial)	Farmland	Urban Area*	A-2 (Agricultural, General)*
West (County of Imperial)	Farmland	Agriculture*	A-2 (Agricultural, General)*
SOURCE: City of El Centro General Plan (2004a)			

1.3 Project Description

The proposed project would develop 63 acres consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, and a future sustainable organic farm/orchard as displayed in Figure 4, Project Site Plan. The existing ICOE West is located on the northeast portion of the parcel and would provide 96 (11 Americans with Disabilities Act [ADA]) shared parking stalls for use by the soccer complex project. South of the ICOE, the Future Imperial Valley Center for Exceptional Children (IVCEC) would provide 277 (20 ADA) shared parking stalls. Additionally, the project proposes 331 parking stalls (11 ADA) south of the dropoff area and north of the field house.

1.3.1 Project Access and Road Improvements

Access to the project site is proposed via Sperber Road. The project would widen Sperber Road on the west side of the street.

2.0 Mitigated Negative Declaration

2.1 Authority to Prepare a Mitigated Negative Declaration

As provided in California Environmental Quality Act (CEQA) Section 21064.5, a Mitigated Negative Declaration (MND) may be prepared for a project “when the Initial Study has identified potentially significant effects on the environment, but revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Negative Declaration

and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”

The City of El Centro (City) is the Lead Agency under CEQA. Based on the findings of the Initial Study/Environmental Checklist for this project, the City has determined that preparation of an MND is the appropriate method by which to obtain compliance with CEQA. The Initial Study/Environmental Checklist is included as Section 4.0 of this report.

2.2 Results of Public Review

- () No comments were received during the public input period.
- () Comments were received during the public input period, but they do not address the Draft Mitigated Negative Declaration findings or the accuracy or completeness of the Initial Study. No response is necessary. The letters are attached.
- () Comments addressing the findings of the Draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses are presented at the beginning of this Final MND.

Copies of the Draft Mitigated Negative Declaration and any Initial Study support material are available for review at the City of El Centro, 1275 Main Street, El Centro, California 92243.

Signature

Norma Villicaña, Community Development Director
City of El Centro

Date of Draft MND

Date of Final MND

3.0 Mitigation Monitoring and Reporting Program

The following project features and mitigation measures would be implemented via the Mitigation Monitoring and Reporting Program (MMRP) to reduce impacts to below a level of significance.

3.1 Air Quality

Mitigation Measure AIR-1

Prior to the issuance of a grading or construction permit for the project site, the Project Applicant shall provide documentation (such as a contract or other legally binding document) to the City proving that contractors and subcontractors will implement the following measures in accordance with the Imperial County Air Pollution Control District (ICAPCD) CEQA Air Quality Handbook performance criteria:

Standard Measures for Fugitive PM₁₀ Control:

- a) All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.
- b) All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- c) All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- d) The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- e) All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area.

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

Discretionary Mitigation Measures for Fugitive PM₁₀ Control

- a) Water exposed soil with adequate frequency for continued moist soil.
- b) Replace ground cover in disturbed areas as quickly as possible.
- c) Automatic sprinkler system installed on all soil piles.
- d) Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
- e) Develop a trip reduction plan to achieve a 1.5 AVR for construction employees.
- f) Implement a shuttle service to and from retail services and food establishments during lunch hours.

Standard Measures for Construction Combustion Equipment

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

3.2 Biological Resources

Mitigation Measure BIO-1

Raptors

To avoid potential impacts to nesting raptors, project construction shall occur between September 1 and January 31, outside of the breeding season of local raptor species. If construction must occur during the raptor breeding season (February 1 to August 30), a preconstruction clearance survey shall be conducted by a qualified biologist to ensure that there are no active nests within 300 feet of construction activities. If an active raptor nest is discovered within this buffer, construction activities shall be restricted until a biologist has determined that the young are independent of the nest site.

Mitigation Measure BIO-2

Burrowing Owl

As required per the California Department of Fish and Wildlife (CDFW) protocol guidelines, pre-construction take-avoidance surveys shall be conducted prior to any project-related ground disturbance. One survey shall be conducted no less than 14 days before the start of ground disturbing activities, and a second survey shall be conducted within 24 hours of the start of ground disturbing activities. These surveys shall include all areas where suitable habitat is present within the survey area (CDFW 2012) with special focus on the area where the western burrowing owl was observed during focused surveys (see Appendix C). Should burrowing owl be determined to still be occupying the survey area, the following measures shall be implemented:

Avoidance of Occupied Burrows: No disturbance shall occur within 50 meters (approximately 160 feet) of occupied burrows during the non-breeding season of September 1 through January 31 or within 75 meters (approximately 250 feet) during the breeding season of February 1 through August 31. Avoidance also requires that a minimum of 6.5 acres of foraging habitat be preserved contiguous with occupied burrow sites for each pair of breeding burrowing owls (with or without dependent young) or single unpaired resident bird.

Mitigation for Unavoidable Impacts: On-site passive relocation shall be implemented, if the above avoidance requirements cannot be met. Passive relocation is defined as encouraging owls to move from occupied burrows to alternate natural or artificial burrows that are beyond 50 meters from the impact zone and that are within or contiguous to a minimum of 6.5 acres of foraging habitat for each pair of relocated owls. Relocation of owls shall only be implemented during the non-breeding season. On-site habitat shall be preserved in a conservation easement and managed to promote burrowing owl use of the site.

Owls shall be excluded from burrows in the immediate impact zone and within a 50-meter (approximately 160 feet) buffer zone by installing one-way doors in burrow entrances; one-way doors should be left in place for 48 hours to ensure that owls have left the burrow before excavation. One alternate natural or artificial burrow shall be provided for each burrow that will be excavated in the project impact zone. The project area shall be monitored daily for one week to confirm owl use of alternate burrows before excavating burrows in the immediate impact zone.

Whenever possible, burrows should be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible plastic pipe or burlap bags should be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow.

Additionally, formal consultation with CDFW in coordination with the City of El Centro would be required to develop an appropriate mitigation plan for the project.

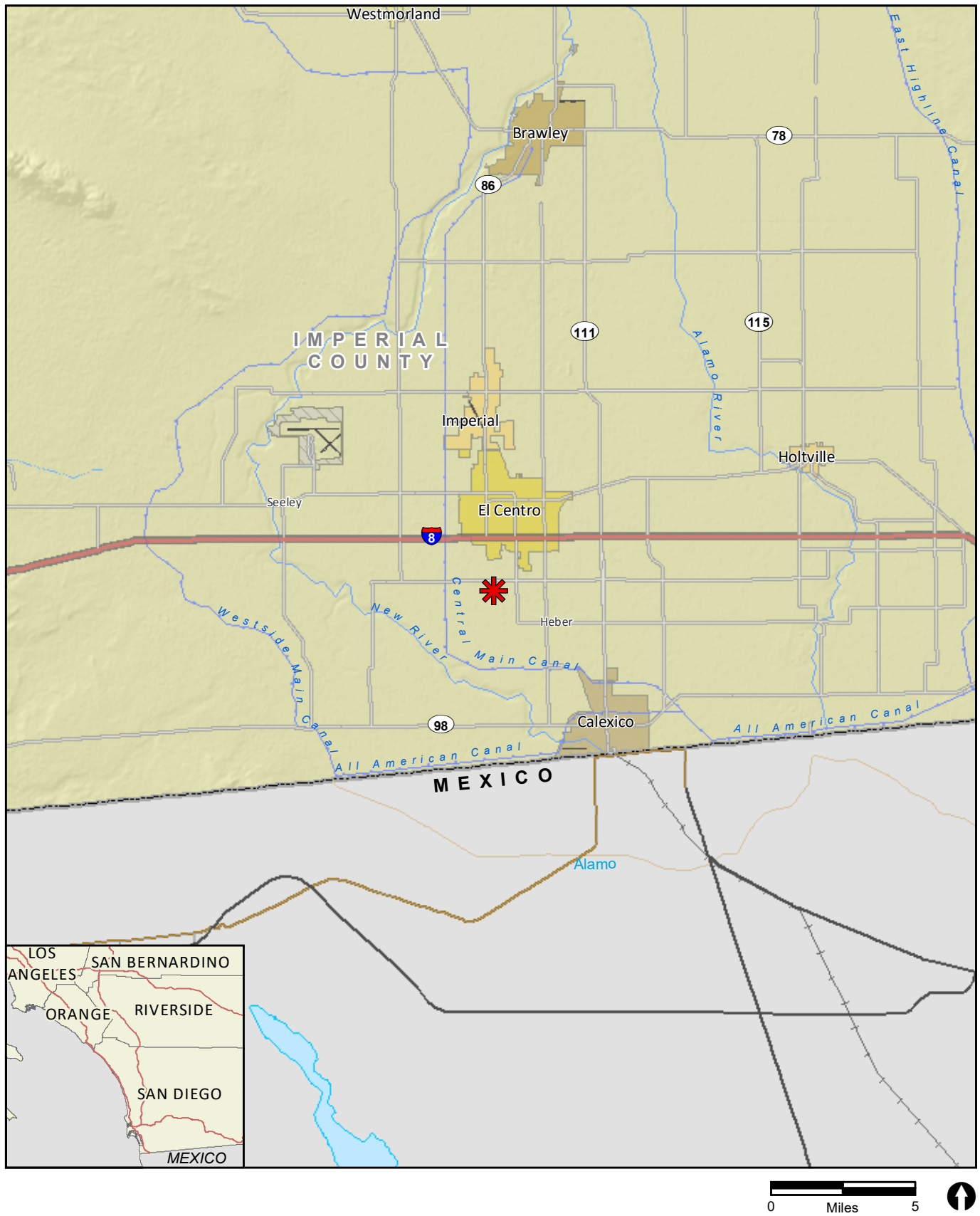
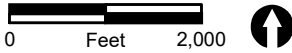
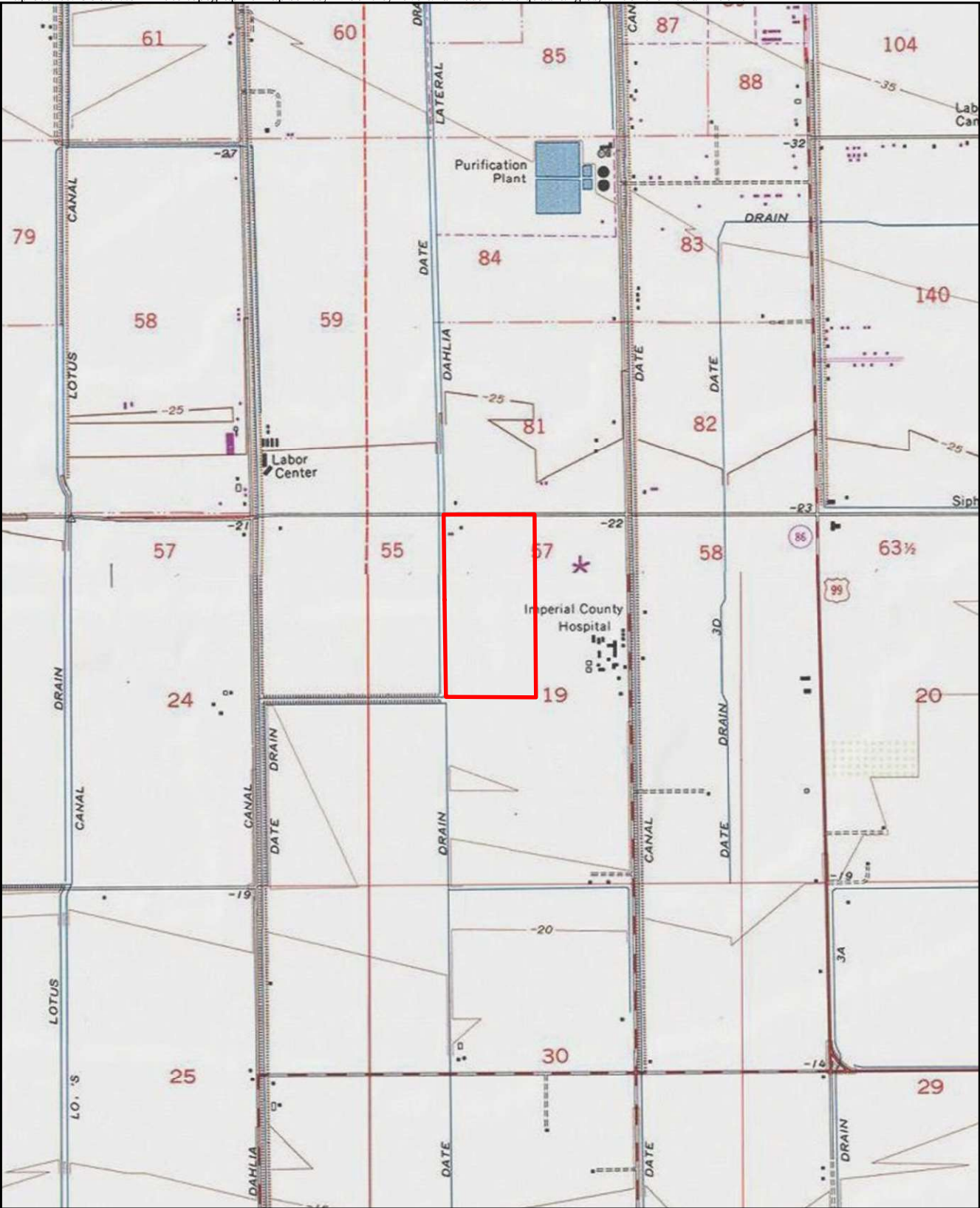


FIGURE 1
Regional Location




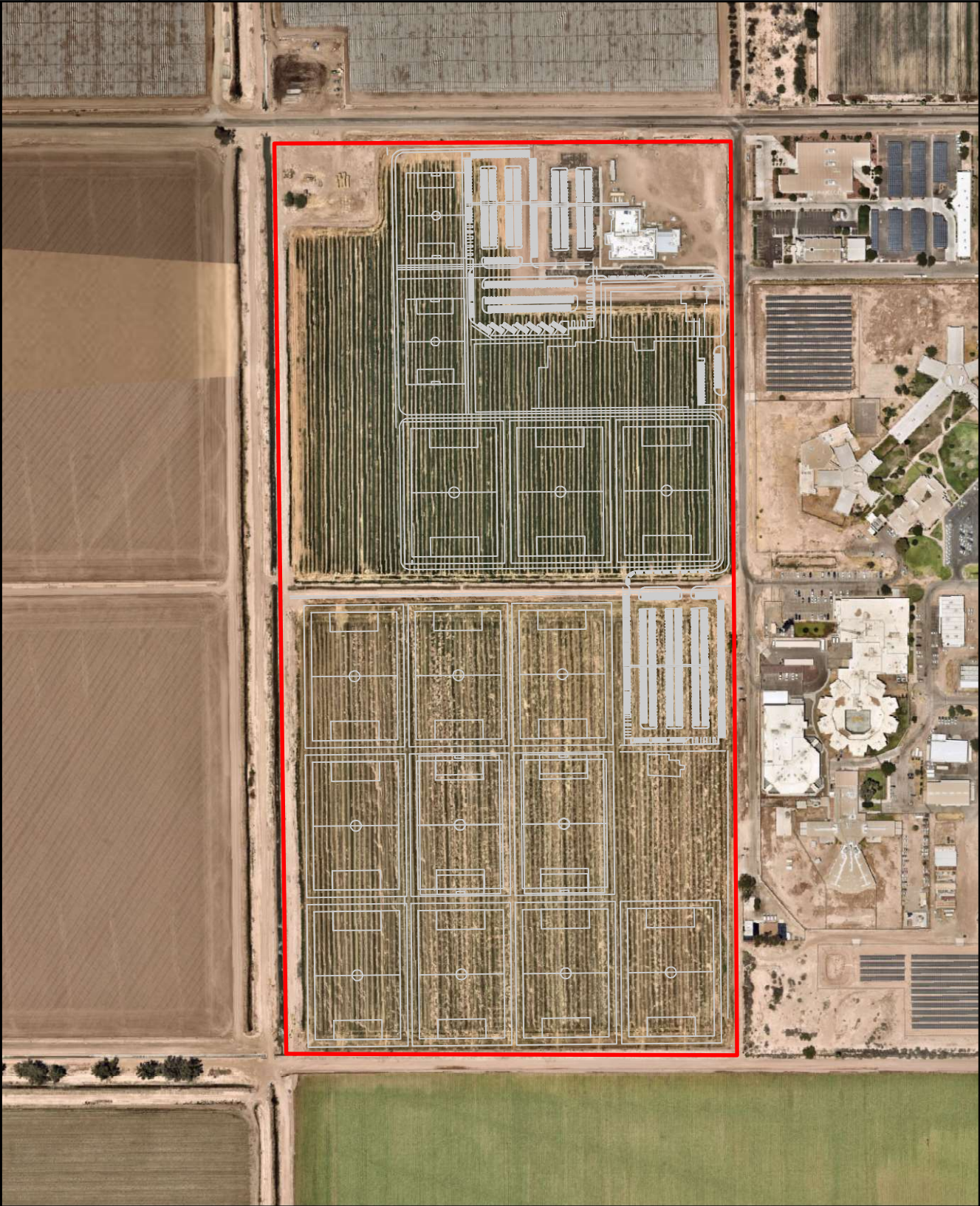
 Project Boundary

FIGURE 2
Project Location on USGS Map



 Project Boundary
 Site Plan

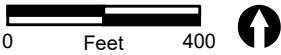


FIGURE 3
Project Location on Aerial Photograph

Site Plan

- A** Existing ICOE West
- B** ICOE West Parking
85 Stalls+11 ADA
- C** Future IVCEC-
- D** Future IVCEC Park-
ing-257 Stalls+ 20 ADA
- E** Concession | Restroom
- F** Food Truck Area
- G** Play Lawn
- H** Nature Play
- I** Bioswale | Native Plant
Garden
- J** Turf Berm
- K** Restroom
- L** Future Organic Farm |
Orchard
- M** Soccer Fields
- N** The Grove | Dining
- O** Warm Up Lawn
- P** Drop off
- Q** Play Area
- R** Wellness Loop
- S** Future Parking
320 Stalls+ 11 ADA
- T** Park Entrance | Ticket
Booth
- U** Main Park Entrance |
Ticket Booth
- V** Field House



4.0 Initial Study

1. Project Title: Monte Vista Regional Soccer and Wellness Park Project
2. Lead agency name and address:

City of El Centro
Community Development Department
1275 Main Street
El Centro, California 92243
3. Contact person and phone number:

Norma Villicaña, AICP, Community Development Director
City of El Centro
(760) 337-4545
4. Project location:

The project site is located on the southeast corner of the intersection of West McCabe Road and Sperber Road in the city of El Centro.
5. Project Applicant/Sponsor's name and address:

Imperial County Office of Education
6. General Plan designation: Public
7. Zoning: Limited Use (LU)
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.): See Section 1.0.
9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):
 - County of Imperial
 - Imperial Irrigation District

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

DETERMINATION (To be completed by Lead Agency):

On the basis of this initial evaluation:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ 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.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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, 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 California Environmental Quality Act process, an effect has been adequately analyzed in an earlier EIR or (mitigated) 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 that 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 significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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I. AESTHETICS

Would the project:

- a. Have a substantial adverse effect on a scenic vista? ☐ ☐ ☐ ☒

No Impact. Scenic vistas include natural features such as topography, watercourses, rock outcrops, natural vegetation, and man-made alterations to the landscape. The project site consists of agricultural lands and water delivery network infrastructure. Given the existing on-site characteristics, development of the proposed project would not cause a substantial adverse effect on a scenic vista. No impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

No Impact. While there are Eligible State Scenic Highways, there are no officially designated State Scenic Highways in Imperial County (California Department of [Transportation [Caltrans] 2020). Eligible highways include Interstate 8 and Highway 98 west of their intersection, Highway 78 to the east of Highway 86, and a portion of Highway 111 north of the Salton Sea. The project site is not located in the viewshed of any of these eligible highways. As the site is not within a scenic highway viewshed, no impact associated with obstructed views from a scenic highway would result. Thus, development consistent with the project would have no impact to scenic resources within a state scenic highway.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☐ ☐ ☒

No Impact. The project site consists of agricultural lands and water delivery network infrastructure. The existing character of the project site does not possess scenic qualities.

The proposed regional soccer and wellness park would not introduce new structures with heights that would block views or otherwise substantially change the scenic character of the

area. Overall, future development of the site would not degrade visual quality or character; thus, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. As described in the City Municipal Code, development standards within the Limited Use zone shall be those of the General Commercial Zone. Thus, light and glare generated by the project would be consistent with the proposed General Commercial zones. General Commercial lighting would comply with Article II, Division 3, Sec 29-63 (n) requirements to provide illumination for the security and safety of on-site areas such as parking, loading, shipping and receiving, walkways, and working areas. Therefore, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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II. AGRICULTURAL/FORESTRY RESOURCES

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. The California Department of Conservation Important Farmland Finder classifies the project site as being Farmland of Statewide Importance. The project site consists of active agricultural lands and water delivery network infrastructure. Under Imperial County's Agricultural Element of the General Plan, the policy is that no agricultural land "shall be removed from the agriculture category except where needed for use by a public agency, for renewable energy purposes, where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated..." In this vein, the removal of agricultural land by the Imperial County Office of Education is acceptable and consistent with the County's policy because the land is being used by a public agency to improve services to the general public. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

No Impact. Imperial County filed non-renewal on all Williamson Act contracts, effective January 2011; however, pursuant to Government Code Section 51246, the contracts remain in full force and effect until the contracts terminate (California Department of Conservation 2019a). According to Figure 5.2-2 within the City of El Centro General Plan EIR (2004b) the project site and adjacent agricultural areas are not covered by a Williamson Act contract. (California Department of Conservation 2016). Therefore, the project would not conflict with zoning for agricultural use or Williamson Act Contract.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220[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"/>

No Impact. The project site is not zoned as forest land or timberland and does not include any forest land or timberland. No impact to forest land or timberland would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

No Impact. The project site and surrounding area does not include any forest land. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The project site and surrounding area does not include any forest land.

As shown by the presence of active farmland adjacent to commercial and residential development throughout Imperial County, the proposed project would not adversely affect existing agricultural use. Active farmland is located south of the project site. Active farmland near the project site is currently located south of the Imperial County Animal Control. As such the potential future development of the site with recreational uses would not preclude use of the adjacent lands for agricultural purposes.

In addition, future growth in the surrounding area that would occur independent of the project could convert active farmland to other uses. Therefore, the project would not result in other changes in the existing environment that would convert farmland to non-agricultural uses, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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III. AIR QUALITY

Would the project:

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

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Less than Significant Impact. The California Air Resources Board (CARB) is the lead agency for preparation of the California State Implementation Plan (SIP), which outlines the state measures to achieve National Ambient Air Quality Standards (NAAQS). CARB delegates responsibility for preparation of SIP elements to local air districts and requires local air districts to prepare Air Quality Attainment Plans outlining measures required to achieve California Ambient Air Quality Standards (CAAQS).

The ICAPCD is the air district responsible for the project area. Applicable ICAPCD air quality plans include:

- Imperial County 2009 State Implementation Plan for Particulate Matter Less than 10 Microns in Aerodynamic Diameter;
- Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM_{2.5} Moderate Non-attainment Area; and
- Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard.

The primary concern for assessing consistency with air quality plans is whether the project would induce growth that would result in a net increase in criteria pollutant emissions that exceed the assumptions used to develop the plan. The criteria pollutant emission projections for the ICAPCD air quality plans are based on Southern California Association of Governments' (SCAG) population growth and regional vehicle miles traveled (VMT) projections, which are based in part on the land uses established by local general plans. As such, projects that propose development that is consistent with the local land use plans would

be consistent with growth projections and air quality plans criteria pollutant emissions estimates. In the event that a project would result in development that is less dense than anticipated by the growth projections, the project would be considered consistent with the air quality plans. In the event a project would result in development that results in greater than anticipated growth projections, the project would result in air pollutant emissions that may not have been accounted for in the air quality plans and thus may obstruct or conflict with the air quality plans.

The General Plan land use designation for the project site is Public, and the site is zoned Limited Use. The project would be consistent with the land use designations for the project site. As a result, the project would be consistent with the growth projections and air quality plans criteria pollutant emissions estimates. Furthermore, the project would not construct housing or other uses that would result in regional population growth. The project would provide needed recreational opportunities for the existing population. Therefore, the project would not result in new growth beyond what was originally anticipated in SCAG's growth projections for Imperial County. Additionally, as summarized in Tables 2 and 3 in Section III(b), operation of the project would result in emissions that are below all applicable project-level significance thresholds. Therefore, project emissions would be consistent with SCAG's growth projections and the ICAPCD's air quality plans, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Mitigation Incorporated. The project site is in non-attainment areas for NAAQS and CAAQS for ozone and particulate matter. The majority of regional 10-micron particulate matter (PM₁₀) and 2.5-micron particulate matter (PM_{2.5}) emissions originate from dust stirred up by wind or by vehicle traffic on unpaved roads (ICAPCD 2009). Other PM₁₀ and PM_{2.5} emissions originate from grinding operations, combustion sources such as motor vehicles, power plants, wood burning, forest fires, agricultural burning, and industrial processes. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Nitrogen oxides (NO_x) and reactive organic gases (ROG) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. Approximately 88 percent of NO_x and 40 percent of ROG regional emissions originate from on- and off-road vehicles (ICAPCD 2010). Other major sources include solvent evaporation and miscellaneous processes such as pesticide application.

Implementation of the project would result in air pollutant emissions associated with the construction and operation of the project. The ICAPCD adopted its CEQA Air Quality Handbook: Guidelines for the Implementation of the California Environmental Quality Act

of 1970 in 2007 and amended the handbook in December 2017 (ICAPCD 2017). The ICAPCD CEQA Air Quality Handbook provides guidance on how to determine the significance of impacts, including air pollutant emissions, related to the development of residential, commercial, and industrial projects. Emissions were calculated using California Emissions Estimator Model (CalEEMod) Version 2016.3.2 (California Air Pollution Control Officers Association [CAPCOA] 2017), and were compared to ICAPCD thresholds.

Construction

Construction-related activities are temporary, short-term sources of air pollutant emissions. Sources of construction-related emissions include:

- Fugitive dust from grading activities;
- Exhaust emissions from construction equipment;
- Application of chemical coatings (paints, stains, sealants, etc.); and
- Exhaust and fugitive dust emission from on-road vehicles (trips by workers, delivery trucks, and material-hauling trucks).

Heavy-duty construction equipment is usually diesel powered. Based on CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation, heavy-duty construction equipment includes off-road diesel vehicles 25 horsepower or greater. In general, emissions from diesel-powered equipment contain more NO_x, sulfur oxides (SO_x), and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less carbon monoxide (CO) and less ROG than do gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Construction emissions were calculated assuming construction would begin in 2021 and last for 18 months, based on the schedule for a similar soccer complex project (AECOM 2018). Primary inputs are the numbers of each piece of equipment and the length of each construction stage. The construction equipment estimates are based on surveys performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

Fugitive Dust

Fugitive dust would be associated with construction activities that involve ground disturbance. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Calculation of fugitive dust emissions are based on the area of disturbed ground and the fugitive dust measures implemented.

The ICAPCD requires that, regardless of the size of a project, all feasible standard measures for fugitive PM₁₀ must be implemented at construction sites. Additionally, all feasible discretionary measures for PM₁₀ apply to those construction sites that are 5 acres or more for non-residential developments or 10 acres or more in size for residential developments. Standard and discretionary measures from the ICAPCD handbook are listed in Mitigation Measure AIR-1 below.

Construction Equipment

CalEEMod calculates emissions of all pollutants from construction equipment using emission factors from CARB's off-road diesel equipment emission factors database, OFFROAD 2011 (CARB 2011).

The ICAPCD requires that, regardless of the size of a project, all feasible standard measures for construction equipment must be implemented at construction sites. Standard measures from the ICAPCD handbook are listed in Mitigation Measure AIR-1 below.

On-Road Vehicles

Construction would generate mobile source emissions from worker trips, hauling trips, and vendor trips. CalEEMod calculates emissions of all pollutants from on-road trucks and passenger vehicles using emission factors derived from CARB's motor vehicle emission inventory program EMFAC2014 (CARB 2014). Vehicle emission factors were multiplied by the model default total estimated number of trips and the average trip length to calculate the total mobile emissions.

Construction Emission Estimates

Table 2 provides a summary of the criteria pollutant emissions generated by the project construction. CalEEMod output files for project construction and operations are contained in Appendix A.

Table 2						
Maximum Daily Construction Air Pollutant Emissions						
Emission Source	Maximum Daily Emissions (pounds)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation	4	41	22	<1	9	6
Grading	4	46	32	<1	5	3
Building Construction/ Architectural Coatings	16	65	75	<1	12	4
Paving	1	13	15	<1	1	1
Max Daily Emissions	16	65	75	<1	12	6
<i>Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>-</i>	<i>150</i>	<i>-</i>
Exceeds Threshold?	No	No	No	-	No	-
SOURCE: Appendix A						
NOTE: Totals may vary due to independent rounding.						

As shown in Table 2, construction emissions associated with future construction of the project site would be less than all applicable ICAPCD significance thresholds. The ICAPCD requires

that, regardless of the size of a project, all feasible standard measures for fugitive PM₁₀ and construction equipment must be implemented at construction sites. Additionally, all feasible discretionary measures for PM₁₀ apply to those construction sites which are 5 acres or more for non-residential developments or 10 acres or more in size for residential developments. With implementation of these standards and measures (Mitigation Measure AIR-1), project construction would not result in a cumulatively considerable increase in non-attainment pollutants, and impacts would be less than significant.

Operation

Operation-related sources of air pollutant emissions include the direct emission of criteria pollutants. Common direct emission sources include mobile sources such as project-generated traffic and area sources such as the use of landscaping equipment.

Mobile Sources

CalEEMod calculates mobile source emissions using emission factors derived from CARB's motor vehicle emission inventory program, EMFAC2014 (CARB 2014). At complete buildout, the project would generate a total of 945 daily trips (see Appendix F). Based on all vehicle trips in Imperial County, an average trip length of 7.6 miles was modeled (CARB 2017).

Regional data indicates that 50 percent of roads in Imperial County are unpaved. However, the project is located within an urbanizing area, and all roadways that would be used to access the project site are paved. Thus, it was assumed that all project-generated trips would travel on paved roads.

Area and Energy Sources

Area source emissions associated with the project include consumer products, natural gas used in space and water heating, architectural coatings, landscaping equipment, and mechanical equipment such as boilers or backup generators. Hearths (fireplaces) and woodstoves are also a source of area emissions; however, the project would not include hearths or woodstoves.

Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents, cleaning compounds, polishes, floor finishes, disinfectants, sanitizers, and aerosol paints but not including other paint products, furniture coatings, or architectural coatings. Emissions due to consumer products are calculated using total building area and product emission factors.

Emissions are generated from energy use such as the combustion of natural gas used in space and water heating. Natural gas demand was based on the California Energy Commission-sponsored California Commercial End Use Survey, which identifies energy use by building type and climate zone.

For architectural coatings, emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. Emissions are based on the building surface area, architectural coating emission factors, and a reapplication rate of 10 percent of area per year.

Landscaping maintenance includes fuel combustion emission from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers as well as air compressors, generators, and pumps. Emission calculations take into account building area, equipment emission factors, and the number of operational days (summer days).

Operational Emission Estimates

Table 3 provides a summary of the criteria pollutant emissions generated by the project operations. CalEEMod output files for project construction and operations are contained in Appendix A.

Table 3						
Maximum Daily Operations Air Pollutant Emissions						
Emission Source	Maximum Daily Emissions (pounds)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	0	0	0	0	0	0
Mobile Sources	2	19	25	<1	4	1
Total Operations	3	19	25	<1	4	1
<i>Significance Threshold</i>	<i>137</i>	<i>137</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>550</i>
Exceeds Threshold?	No	Yes	No	No	No	No
SOURCE: Appendix A						
NOTE: Totals may vary due to independent rounding.						

As shown in Table 3, operational emissions would be less than the applicable thresholds for all criteria pollutants. The project would not result in a cumulatively considerable net increase of criteria pollutants, and operational impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The term “sensitive receptor” refers to a person in the population who is more susceptible to health effects due to exposure to an air contaminant than the population at large or to a land use that may reasonably be associated with such a person. Examples include schools, day care centers, hospitals, retirement homes, convalescence facilities, and residences. The project site is in a rural environment. The project site is mostly surrounded by agricultural uses, and government uses are located to the east. There are no residential uses in the immediate vicinity of the project site. The nearest

sensitive receptor is the Betty Jo McNeece Receiving Home located 800 feet northeast of the project site. Other residential receptors are located more than 1,000 feet from the project site.

Construction-related Diesel Particulate Matter

Construction of the project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Particulate exhaust emissions from diesel-fueled engines (diesel PM or DPM) were identified as a toxic air contaminant by CARB in 1998. Project construction would result in the generation of DPM emissions from the use of off-road diesel construction equipment during site preparation and facility installation. Other lesser construction-related sources of DPM include material delivery trucks.

Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Construction activities would be short-term and would only be a fraction of the total exposure period used for health risk calculation.

Therefore, because of the distance to the nearest sensitive receptor and the short duration of construction, DPM generated by project construction is not expected to result in an excess cancer risk. Additionally, with ongoing implementation of U.S. Environmental Protection Agency (U.S. EPA) and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment used for future construction activities would be substantially reduced over time. Therefore, construction would not expose sensitive receptors to substantial pollutant concentration.

CO Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate state and federal CO standards at intersections, even if the broader basin is in attainment for federal and state levels. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010, which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. No intersections in the vicinity of the project carry this substantial amount of traffic. Additionally, there are no signalized intersections in the vicinity of the project site. Traffic generated by the project would not result in any heavily congested intersections. Thus, the project is not anticipated to result in a CO hot spot.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The potential for an odor impact is dependent on a number of variables including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. Project construction would result in the emission of diesel fumes and other odors typically associated with construction activities. Odors are highest near the source and would quickly dissipate off the site. There are no residential uses in the immediate vicinity of the project site. The nearest sensitive receptor is the Betty Jo McNeece Receiving Home located 800 feet northeast of the project site. Other residential receptors are located more than 1,000 feet from the project site. Any odors associated with construction activities would be transient and would cease upon completion. Therefore, project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant. Once operational, the project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES

Would the project:

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. Have substantial adverse effects, 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

A Biological Technical Report dated November 5, 2020, was prepared by RECON Environmental, Inc. for the proposed project and can be found as Appendix B (RECON 2020a).

Less than Significant with Mitigation Incorporated. No state or federally listed threatened, endangered, or sensitive plant species are expected to occur on-site; therefore, no impacts are expected to occur to sensitive plants. As described in the Biological Technical Report (RECON 2020), an American kestrel and western burrowing owl were observed within the project survey area. Raptor species have a low to moderate potential to nest in the trees adjacent to the property. Western burrowing owls have a moderate to high potential to forage within the property. As described in the Western Burrowing Owl Focused Survey prepared by RECON Environmental, Inc. (2020b; Appendix C), one adult western burrowing owl and

one active burrow were detected during the 2020 non-breeding season surveys. Therefore, any impacts to an active burrowing owl burrow and/or raptor nest would be considered significant and would require mitigation.

Mitigation Measure BIO-1 would require construction to occur between September 1 and January 31, outside of the breeding season of local raptor species. Mitigation Measure BIO-2 would require pre-construction take-avoidance surveys prior to any project-related ground disturbance. Implementation of Mitigation Measure BIO-1 and BIO-2 would reduce potential impacts to an active raptor nest and/or burrowing owl burrow to a level less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Plant species within the project area are sparse and are generally located along the access roads, berms, and canals that surround the agricultural fields. However, the site does contain any riparian habitats or agricultural drains or canals that would be considered wetland or non-wetland waters under the jurisdiction of the United States Army Corps of Engineers, Regional Water Quality Control Board, and/or the CDFW. As such, no impacts to riparian habitats would not occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Refer to above response.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project site does not serve as a nursery site. The area is not within or near an established wildlife corridor. The project would result in no impact related to wildlife corridors or nursery sites.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed improvements would not conflict with any of these plans because the project site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. No impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. No impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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V. CULTURAL RESOURCES

Would the project:

g. Cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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A Cultural Resources Survey dated October 29, 2020, was prepared by RECON Environmental, Inc. for the proposed project and can be found as Appendix D.

Less than Significant Impact. As described in the Cultural Resources Survey (RECON 2020c), one previously unrecorded historic-period resource, a set of earthen and concrete-lined canals servicing the project property (9781-NDY-1), was recorded using a California State Parks Department of Parks and Recreation 523 primary site form. In addition, the survey found a previously unrecorded segment of the Dahlia Canal Lateral 1 (P-13-017171). 9781-NDY-1 (interior canals) and the unrecorded segment of P-13-017171 (Dahlia Canal Lateral 1) within and adjacent to the project area do not meet any of the criteria for listing on the California Register of Historic Places and are therefore not significant historical resources under CEQA. Because none of these resources are significant historical resources under CEQA, no impacts would occur as a result of project development.

Furthermore, the possibility of buried significant prehistoric cultural resources present within the project site is considered low. The topsoil within the project site has been heavily disturbed in the past due to agriculture, leaving no suitable areas where potentially significant prehistoric or historic cultural resources could be present. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. A letter was sent to the Native American Heritage Commission (NAHC) in Sacramento on October 22, 2020 requesting a search of their Sacred Lands File. The NAHC replied on November 4, 2020, indicating that they had no record of Native American cultural resources in the immediate area of the project.

The integrity of the project site has been compromised through agricultural operations. Consequently, it is considered unlikely that unknown archaeological resources would be encountered during project construction. Therefore, development as a result of the project would not cause a substantial adverse change in the significance of an archaeological resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
i. Disturb human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. No cemeteries, formal or informal, have been identified on-site or within the project vicinity. In the unlikely event that remains are located on-site, the project would be required to comply with California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) that require proper handling of human remains. Compliance with these regulations would ensure any unforeseen impacts related to human remains would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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VI. ENERGY

Would the project:

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

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Less than Significant Impact. For the last two decades, California has emerged as a leader in promoting policies designed to grow the state's portfolio of renewable energy generation and use. Most recently, California passed two bills further increasing the state's commitment to reductions in greenhouse gas (GHG) emissions through reductions in fossil fuels and increases in renewable energy: Senate Bill (SB) 350 requiring retail sellers and publicly owned utilities to procure half of their electricity from renewable sources by 2030. This requirement is known as the Renewable Portfolio Standard or "RPS." In 2016, the Legislature passed SB 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels.

The State of California has adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the California Code of Regulations (CCR), specifically Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2016 Title 24 energy are the currently mandated building standards. The upcoming 2019 Title 24 Building Standards become effective for projects that obtain their building permits on or after January 1, 2020.

The 2016 CALGreen Standards Code (24 CCR 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impacts during and after construction. The project would be required to be consistent with these objectives and policies. Thus, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. Development of the site would be required to comply with the State of California's Title 24 Building Standards and CALGreen requirements for energy efficiency. As such, the project would be consistent with the energy efficiency and transportation goals established within the City's Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan. Because the project complies with the latest applicable energy efficiency standards, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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VII. GEOLOGY/SOILS

Would the project:

- c. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

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Less than Significant Impact. As with the entirety of Imperial County, the project site is located in the seismically active southern California region, and fault zones in the area include the San Andreas, San Jacinto, and Elsinore. As shown in the California Department of Conservation California Earthquake Hazards Zone Application (2019b), the project site is not located within a known Alquist-Priolo Earthquake Fault Zone, and there are no known regional faults located beneath the project site. Therefore, the risk of earthquake ground rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. As indicated above, the site is located in the seismically active Imperial Valley of the southern California region. As such, the project site is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region, especially from earthquakes along the Imperial, Brawley, and Superstition Hills faults.

Ground motions are dependent primarily on the earthquake magnitude and distance to the rupture zone. Acceleration magnitudes are also dependent upon attenuation by rock and soil deposits, direction or rupture, and type of fault. As a result, ground motions may vary considerably in the same general area.

Development of the field house within the project site would be required to comply with the California Building Code and would be required to comply with the City's General Plan, which includes policies related to seismicity and Implementation Programs S-1 to S-3 related to seismic safety. The City's General Plan policies include the following:

- **City Seismicity Policy 1.1:** Reduce the risk of impacts from seismic hazards by applying proper development engineering, building construction, and retrofitting requirements.
- **City Seismicity Policy 1.2:** Restrict land uses in areas determined to be subject to seismic hazards and require adequate environmental review and mitigation measures for development proposed within a geological hazard area.

Adherence to the California Building Code and the City's General Plan policies would reduce potential risks associated with strong seismic ground shaking to a level less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Mitigation Incorporated. Liquefaction generally occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. Four conditions are generally required for liquefaction to occur: the soil must be saturated; the soil must be loosely packed; the soil must be relatively cohesionless; and ground shaking of sufficient intensity must occur to function as a trigger mechanism.

As described in the Biological Technical Report (RECON 2020a), the project site contains three soil types: Imperial-Glenbar silty clay loams (0-2 percent slopes); Imperial silty clay, wet; and Holtville silty clay, wet. The Imperial-Glenbar silty clay loams are the dominant soil

covering the vast majority of the survey area (U.S. Department of Agriculture[USDA] 1973). A very small portion of the eastern part of the survey area contains Holtville silty clay. Two small areas of Imperial silty clay exist in the northwestern and northeastern portions of the survey area. Since the project site contains silty soils. As such, there is the potential for liquefaction induced settlements and ground failure from project development.

Compliance with the California Building Code would mitigate any potential risks associated with liquefaction. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project site and surrounding area is generally flat and there are no steep slopes or other features surrounding the project site that could be subject to a landslide. Therefore, the proposed project would not result in any impacts related to landslides.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The project site is relatively flat and consists of disturbed land. The USDA identifies soils on the project site as Imperial-Glenbar silty clay loams (0-2 percent slopes); Imperial silty clay, wet; and Holtville silty clay, wet. The Imperial-Glenbar silty clay loams are the dominant soil covering the vast majority of the survey area (USDA 1973). A very small portion of the eastern part of the survey area contains Holtville silty clay. Two small areas of Imperial silty clay exist in the northwestern and northeastern portions of the survey area. The project would result in minimal loss of topsoil due to the majority of the project would be soccer fields.

Project development would be required to comply with the City's General Plan Implementation Program PF-12 and S-6, which requires the implementation of best management practices (BMPs) in accordance with the National Pollutant Discharge Elimination System Permit and proper drainage facilities to handle runoff. This program is implemented via the City's Municipal Code grading regulations that require the preparation of an erosion control plan prior to the issuance of a grading permit (Article XIX, section 7-124) and that any future construction implement BMPs to control soil erosion ((Article VII, Division 1, Section 22-707; Ord. No. 15-05, §1, 4-21-15). As compliance with these regulations ensure that no significant soil erosion impacts would occur and future development at the project site would be subject to these regulations, the project would have a less than significant impact related to substantial soil erosion.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. 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"/>

Less than Significant Impact. Refer to responses VI(i) to VI(iv), above. In addition to those previously identified conditions, it is noted that the native surface clays have a moderate to high swell potential, as the clay is expansive when wetted and can shrink with moisture loss. Development of any structures on the project site would be required to comply with the California Building Code. Compliance with the California Building Code would ensure the project site would have a less than significant impact related to soil stability.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. Refer to responses VI(i) to VI(iv) and V(c), above. The surface soils within the project site consist primarily of silty clay and silty clay loams. Due to the clay content, the surface soils have potential to be considered expansive, as they exhibit a moderate to high swell potential. Development of any structures on the project site would be required to comply with the California Building Code. Compliance with the California Building Code would ensure potential risks associated with expansive soils would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project would tie into the existing sewer system and does not propose the use of septic systems. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The significance of paleontological resources is based on the potential to yield fossils that can provide research information regarding earth's chronology and history. The surface soils within the project site consist primarily of silty clay and silty clay loams which have a low potential to yield significant paleontological resources. In addition, the integrity of the project area has been compromised through previous agricultural uses. Overall, the potential for significant paleontological resources to be present on-site is considered low, and future development of the site would have a less than significant impact to significant paleontological resources.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS

Would the project:

j. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact. No GHG emission threshold has been adopted by the City or ICAPCD for land development projects. The City is a member of SCAG. Thus, in the absence of a threshold of significance for GHG emissions, the project is evaluated based on the South Coast Air Quality Management District's (SCAQMD) significance thresholds.

The SCAQMD published its *Interim CEQA GHG Significance Thresholds for Stationary Sources, Rules, and Plans* in 2008 (South Coast AQMD 2008, 2010). The interim thresholds are a tiered approach; projects may be determined to be less than significant under each tier or require further analysis under subsequent tiers. The five tiers are:

- Tier 1: The project is exempt from CEQA.
- Tier 2: The project is consistent with an applicable regional GHG emissions reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3: Project GHG emissions represent an incremental increase below, or mitigated to less than Significance Screening Levels, where screening levels are developed based on a 90 percent emissions capture rate

- Residential/Commercial Screening Level
 - Option 1: 3,000 metric tons of carbon dioxide equivalent (MT CO₂E) screening level for all residential/commercial land uses
 - Option 2: Screening level thresholds for land use type acceptable if used consistently by a lead agency:
 - Residential: 3,500 MT CO₂E
 - Commercial: 1,400 MT CO₂E
 - Mixed-Use: 3,000 MT CO₂E
- 10,000 MT CO₂E is the Permitted Industrial Screening Level
- Tier 4: The project achieves performance standards, where performance standards may include
 - Option 1: Percent emission reduction target. SCAQMD has no recommendation regarding this approach at this time.
 - Option 2: The project would implement substantial early implementation of measures identified the CARB's Scoping Plan. This option has been folded into Option 3.
 - Option 3: SCAQMD Efficiency Targets.
 - 2020 Targets: 4.8 MT CO₂E per service population (SP) for project-level analyses or 6.6 MT CO₂E per SP for plan level analyses where SP includes residential and employment populations provided by a project.
 - 2035 Targets: 3.0 MT CO₂E per SP for project-level analyses or 4.1 MT CO₂E per SP for plan level analyses.
- Tier 5: Offsets along or in combination with the above target Significance Screening Level. Offsets must be provided for a 30-year project life, unless the project life is limited by permit, lease, or other legally binding condition.

If a project complies with any one of these tiers, its impacts related to GHG emissions would be considered less than significant.

Consistent with the SCAQMD guidance, the recommended/preferred tiered approach for most land use development projects in SCAQMD jurisdiction is assessment against the applicable screening levels. As the project is not exempt from CEQA and is not part of an approved local plan, project emissions would initially be assessed against a 3,000 MT CO₂E screening level for residential/commercial land uses (Option 1). This screening level is intended to exempt projects that are too small to have significant impacts from further analysis.

Sources of GHG emissions include construction (off-road construction equipment, worker commute, and hauling/delivery trips), mobile (on-road vehicles), energy (electricity and natural gas), area (landscape maintenance equipment), water and wastewater, and solid waste sources. GHG emissions were calculated using the CalEEMod computer program and were calculated for the three GHGs of primary concern (CO₂, methane [CH₄], and nitrous oxide [N₂O]) that would be emitted from construction and operation.

Construction

Construction activities emit GHGs primarily through combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in on-road construction vehicles and the commute vehicles of the construction workers. Construction emissions were modeled using the parameters discussed in Section III.b. Based on guidance from the SCAQMD, total construction GHG emissions resulting from a project should be amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of a project (SCAQMD 2009).

Vehicles

GHG emissions from vehicles come from the combustion of fossil fuels in vehicle engines. The vehicle emissions are calculated based on the vehicle type and the trip rate for each land use. The vehicle emission factors and fleet mix used in CalEEMod are derived from CARB's 2014 Emission Factors model. Vehicle trip parameters are discussed in Section III.b.

Energy Use

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's operation. Combustion of fossil fuel emits criteria pollutants and GHGs directly into the atmosphere. When this occurs in a building, this is considered a direct emissions source associated with that building. Energy consumption values are based on the California Energy Commission sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies, which identify energy use by building type and climate zone. Because these studies are based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 Building Codes. CalEEMod 2016.3.2 is based on the 2016 Title 24 energy code (Part 6 of the Building Code).

Area Sources

Area sources include GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. The landscaping equipment emission values were derived from the 2011 In-Use Off-Road Equipment Inventory Model (CARB 2011).

Water and Wastewater

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH₄ and N₂O. Emissions associated with water and wastewater were calculated using standard water use rates and emission factors.

Solid Waste

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, the total volume of solid waste was calculated using waste disposal rates identified by California Department of Resources Recycling and Recovery. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change method, using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters.

Project GHG Emissions

Table 4 summarizes the total project GHG emissions. GHG emission calculation output is provided as Appendix E.

Table 4 Worst-case Project Greenhouse Gas Emissions (MT CO₂E per Year)	
Emission Source	Project GHG Emissions
Vehicles	1,219
Energy Use	41
Area Sources	<1
Water Use	439
Solid Waste Disposal	2
Construction	54
TOTAL	1,757

As shown in Table 4, the project would result in a total emission of 1,757 MT CO₂E annually. This is less than the 3,000 MT CO₂E screening threshold. As the project would not exceed the 3,000 MT CO₂E screening threshold for GHG emissions, GHG impacts associated with the project would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. State GHG emissions reduction policy was established by Executive Orders S-3-05 and B-30-15 and was subsequently codified by Assembly Bill (AB) 32 and SB 32. Executive Order S-3-05 established GHG emission reduction targets of year 2000 GHG emission levels by 2010, year 1990 GHG emission levels by 2020, and 80 percent below year 1990 levels by 2050; and Executive Order B-30-15 established an interim GHG emission reduction target of 40 percent below year 1990 levels by 2030. AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020

target, which has been achieved. SB 32 enacts the Executive Order B-30-15 target of reducing GHG emissions to 40 percent below year 1990 levels by 2030.

As discussed above, the project emissions would be below the screening level of 3,000 MT CO₂E. This threshold is based on the concept of establishing a 90 percent GHG emission capture rate. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to a CEQA analysis, which includes analyzing feasible alternatives and imposing feasible mitigation measures. The market capture rate is based on guidance from the CAPCOA report CEQA & Climate Change, dated January 2008, which identifies several potential approaches for assessing a project's GHG emissions (CAPCOA 2008). Following the market capture rate approach, a lead agency defines an acceptable capture rate and identifies the corresponding emissions level. Following rationale presented in the CAPCOA Guidance, the aggregate emissions from all projects with individual annual emissions that are equal to or less than the identified market capture rate would not impede achievement of the state GHG emissions reduction targets codified by AB 32 and SB 32, and impacts under CEQA would therefore be less than cumulatively considerable. A 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions.

Project GHG emissions would be less than the applicable SCAQMD screening level of 3,000 MT CO₂E. Further, project emissions would decline beyond the buildout year of the project, 2022, as a result of continued implementation of federal, state, and local reduction measures such as increased federal and state vehicle efficiency standards, and Imperial Irrigation District's (IID) increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions, once fully constructed and operational, the project is in line with the GHG reductions needed to achieve the 2050 GHG emission reduction targets identified by EO S-3-05.

The 2017 Scoping Plan identifies state strategies for achieving the state's 2030 interim GHG emissions reduction target codified by SB 32. Measures under the 2017 Scoping Plan scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, RPS, Sustainable Communities Strategy, Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. The project would comply with all applicable provisions contained in the 2017 Scoping Plan since the adopted regulations would apply to new development or the emission sectors associated with new development.

- **Transportation** – State regulations and 2017 Scoping Plan measures that would reduce the project's mobile source emissions include the California Light-Duty Vehicle GHG Standards (AB 1493/Pavley I and II), the Low Carbon Fuel Standard, and the heavy-duty truck regulations. These measures are implemented at the state level and would result in project-related mobile source GHG emissions.

- **Energy** – State regulations and 2017 Scoping Plan measures that would reduce the project’s energy-related GHG emissions include RPS, Title 24 Energy Efficiency Standards, and CALGreen. The project would be served by IID, which has achieved 28.6 percent renewables as of 2017, and is projected to achieve 48.8 percent by current year 2020. The project’s energy related GHG emissions would decrease as IID increases its renewables procurement beyond 2020 towards the 2030 goal of 50 percent. The project would not interfere with IID efforts towards achieving RPS goals. A majority of the project site would be developed with soccer fields which would not result in any building energy consumption. On-site buildings such as the proposed bathroom and fieldhouse would be constructed in accordance with energy efficiency standards effective at the time building permits are issued. The current 2019 Energy Code is estimated to decrease energy consumption by 30 percent for non-residential buildings when compared to the 2016 Title 24 Energy Code.
- **Water** – State regulations and 2017 Scoping Plan measures that would reduce the project’s electricity consumption associated with water supply, treatment, and distribution, and wastewater treatment include RPS, CALGreen, and the Model Water Efficient Landscape Ordinance. The project would be subject to all City landscaping ordinance requirements. Additionally, the project would be required to reduce indoor water consumption associated with the restroom and fieldhouse by 20 percent in accordance with CALGreen.
- **Waste** – State regulations and 2017 Scoping Plan measures that would reduce the project’s solid waste-related GHG emissions are related to landfill methane control, increases efficiency of landfill methane capture, and high recycling/zero waste. The project would be subject to CALGreen, which requires a diversion of construction and demolition waste from landfills. Additionally, the project would include recycling storage and would divert waste from landfills in accordance with AB 341.

In summary, the project would not conflict with implementation of the 2017 Scoping Plan GHG reduction measures.

Regional GHG emissions reduction policy includes the SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is intended to create more compact communities in existing urban areas, providing neighborhoods with efficient and plentiful public transit, abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserving more of the region’s remaining natural lands. The project would not conflict with implementation of the 2016 RTP/SCS strategies. The project would construct a soccer complex that would provide much needed recreational amenities for local youth, reducing the need for El Centro residents to travel further distances for youth sport activities. Future development of the project site would support achievement of the goals of the 2016 RTP/SCS. Therefore, the project would not conflict with the 2016 RTP/SCS.

The project would not conflict with state or regional GHG emissions reduction policies. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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IX. HAZARDS/HAZARDOUS MATERIALS

Would the project:

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

☐ ☐ ☒ ☐

Less than Significant Impact. Construction would involve small amounts of hazardous materials such as fuels, lubricants, solvents, and architectural coating materials. During the operational phase, hazardous materials may be used for cleaning and maintenance. Hazardous materials and wastes would be managed and used in accordance with all applicable federal, state, and local laws and regulations. In addition, disposal of any contaminated material would be in accordance with state and County regulations. Therefore, project compliance with all applicable regulations would ensure impacts regarding the routine transport, use, or disposal hazardous materials would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- k. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ ☐ ☒ ☐

Less than Significant Impact. See response to IX(a) above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- l. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ ☐ ☒ ☐

Less than Significant Impact. The closest existing school is McCabe Elementary School, located approximately 1.8 miles west of the project site. The IVCEC landLAB is a new facility (designed for severely handicapped children) being proposed on the northeast portion of the project site. The project proposed 13 full size soccer fields, two youth soccer fields, and other recreational uses. Hazardous materials and wastes would be managed and used in accordance with all applicable federal, state, and local laws and regulations. In addition, disposal of any contaminated material would be in accordance with state and County regulations. Therefore, project compliance with all applicable regulations would ensure impacts regarding hazardous emissions, materials, substances, or waste would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
m. 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"/>

No Impact. According to the Department of Toxic Substances Control EnviroStor database (2020), the proposed project site is not listed as a hazardous materials site. Therefore, no impacts related to hazardous materials sites would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
n. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project site is located approximately 7 miles south of Imperial County Airport. The project site is located approximately 9 miles southeast of Naval Air Facility (NAF) El Centro. According to Figure LU-5 of the City's General Plan, the project site is not located within the land use compatibility zones of either facility and would not create a safety hazard. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
o. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project would not interfere with the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The City of El Centro Standardized Emergency Management System (SEMS) Multihazard Functional Plan (MHFP) addresses the City's planned response. The project would not impair implementation of this plan. Development of the project site would improve access by adding an eastbound right-turn deceleration lane on McCabe Road at Sperber Road and widening Sperber Road on the west side of the street. Therefore, there would be no impacts associated with the physical interference of an emergency evacuation plan.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
p. 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"/>

Less than Significant Impact. The project site is located in an agricultural and urban setting. The site is not proximate to large areas of wildland, and thus people would not be exposed to wildland fires.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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X. HYDROLOGY/WATER QUALITY

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

No Impact. The proposed project would be subject to the federal and state Clean Water Act, which is established through compliance with the requirements of the National Pollutant Discharge Elimination System General Permit for the City of El Centro (Municipal Permit), State Water Resources Control Board Order No. 2013-0001-DWG. The project would be required to comply with the City's storm water requirements (Ordinance Chapter 22, Article VII), which consist of the City's Jurisdictional Runoff Management Plan (City of El Centro 2015) and the associated City of El Centro Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects. As the proposed project would be required to comply with City and state regulations, the project would not violate any water quality standards or waste discharge requirements.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project would not require the construction of wells or the use of groundwater as a water source. Water service would be provided by the City of El Centro. Thus, the project would have no impact on groundwater levels.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The proposed project would develop 63 acres consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. Thus, the project proposes minimal impervious surfaces and is not expected to alter the drainage pattern. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. See responses to X(a and c) above. As identified by the Federal Emergency Management Agency Flood Map Service Center (2020), the project site is not located within a 100-year flood hazard area. Additionally, the project site is not located near a levee or dam that could fail and result in flooding. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The proposed project would be required to comply with the City's storm water regulations during construction and after construction, including measures to control runoff rates and control pollution in runoff. During construction, future development would be required to comply with the Construction General Permit Order 2009-0009-DWQ, and the associated requirement to prepare a SWPPP with BMPs. In addition,

project operations would be required to comply with the National Pollutant Discharge Elimination System and the City's storm water protection program. Compliance with these regulations ensure that storm water runoff rates are controlled to existing conditions levels, and, therefore, the project would not exceed the capacity of the existing or planned storm water drainage systems. Thus, project impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. 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 create or contribute runoff water which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. See responses to IX(a and c), above. Project development would be required to comply with all City storm water quality standards during and after construction. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. There would be no risk associated with tsunami due to the project site's distance of approximately 120 miles east of the Pacific Ocean. Similarly, there would be no risk associated with seiche because there are no lakes or other large bodies of water near the project site. The project site and surrounding area is generally flat and there are no steep slopes or other features surrounding the project site that could create mudflows. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. 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"/>

Less than Significant Impact. Although the project would increase impervious surfaces, surface water would infiltrate on-site through the proposed soccer fields. Thus, the project would not substantially interfere with groundwater recharge and, therefore, would not conflict with or obstruct a sustainable groundwater management plan. As discussed above, the proposed project would be required to comply with the project-specific Drainage Study, Storm Water Quality Management Plan, and Storm Water Pollution Prevention Plan to ensure compliance with applicable water quality control and sustainable groundwater

management plans. Compliance with these plans would result in less than significant impacts.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XI. LAND USE/PLANNING

Would the project:

- a. Physically divide an established community? ☐ ☐ ☐ ☒

No Impact. The project site consists of active agricultural lands. No public roadways exist on the site that provide connections through the community. Thus, the project would not physically divide an established community.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒

No Impact. The proposed project would develop 63 acres consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The General Plan land use designation for the project site is Public, and the site is zoned Limited Use. The project would be consistent with the land use and zoning designations for the project site. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XII. MINERAL RESOURCES

Would the project?

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

No Impact. No known mineral resources exist on the project site or surrounding properties. Additionally, the project site is not within a mineral resource zone as designated by the California Department of Conservation's Division of Miner Reclamation, Mineral Land Classification map (2015). Therefore, implementation of the project would not result in loss of availability of a known mineral resource. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

No Impact. The project site and surrounding properties are not designated or zoned for mineral extraction uses in the El Centro General Plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XIII. NOISE

Would the project result in:

i. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

Construction

The project site is located within the city of El Centro. Parcels to the east, south, and west of the project site are located within the county of Imperial, while parcels to the north of the site are located within the city of El Centro. Construction noise levels were evaluated against criteria established by both the City and the County.

The City's Noise Abatement and Control Ordinance establishes construction time of day restrictions and noise level limits. Construction activities may only occur Monday through Saturday between the hours of 6:00 a.m. and 7:00 p.m., excluding holidays. Additionally, construction noise may not exceed 75 A-weighted decibels equivalent noise level (dB(A) L_{eq}) at or beyond the property line of a property that is developed and used for residential purposes.

The County's General Plan Noise Element also establishes construction time of day restrictions and noise level limits. Construction activities may only occur Monday through Friday between the hours of 7:00 a.m. and 7:00 p.m., and Saturday between the hours of 9:00 a.m. and 5:00 p.m., excluding holidays. The County also applies a limit of 75 dB(A) L_{eq} at residential properties.

Construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, construction, loading, unloading, and placing materials and

paving. Construction noise would potentially result in short-term impacts to surrounding properties. There are no residential uses in the immediate vicinity of the project site. The near residential uses are located north of McCabe Road approximately 1,000 feet north of the project boundary, east of Clark Road approximately 1,300 feet east of the project boundary, and along La Brucherie Road more than 2,500 feet west of the project boundary. Common construction equipment such as graders and dozers generate a maximum noise level of 85 dB(A) L_{eq} at 50 feet with a typical duty cycle of 40 percent. Assuming the simultaneous operation of three pieces of equipment, the average hourly noise level would be approximately 86 dB(A) L_{eq} at 50 feet from the center of construction activities. This noise level would attenuate to 75 dB(A) L_{eq} at 170 feet. There are no residential uses within 170 feet of the project site. As construction activities associated with the project would comply with noise level limits from the City's and the County's Noise Abatement and Control Ordinances, temporary increases in noise levels from construction activities would be less than significant.

Off-site Traffic Noise

Project-generated traffic would increase volumes on local roadways and thereby increase traffic noise levels. Off-site traffic noise was modeled using the FHWA Traffic Noise Prediction Model algorithms and reference levels. Traffic noise levels were calculated at 50 feet from the centerline of the affected roadways to determine the noise level increase associated with the project. The model uses various input parameters, such as traffic volumes, vehicle mix, distribution, and speed.

Table 5 summarizes the existing and near-term traffic noise levels without and with the project. Calculations are provided in Appendix F.

Table 5						
Traffic Noise Levels Without and With Project (CNEL)						
Roadway Segment	Existing			Near-Term		
	Without Project	With Project	Noise Increase	Without Project	With Project	Noise Increase
McCabe Road						
La Brucherie Road to Sperber Road	64.0	64.2	0.2	64.4	64.6	0.2
Sperber Road to Clark Road	63.4	64.0	0.6	63.8	64.4	0.6
Clark Road to SR-86	64.6	65.0	0.4	65.0	65.3	0.3
Clark Road						
Wake Avenue to McCabe Road	64.7	64.8	0.1	65.1	65.2	0.1

As shown, noise level increases associated with project traffic would be less than 1 dB(A) adjacent to all analyzed roadway segments. Noise level increases at would be less than 3 dB(A) and would, therefore, not be perceptible (Caltrans 2013a). Impacts associated with off-site noise level increases would be less than significant.

Land Use Compatibility

The City General Plan Noise Element policies and plans are designed to protect the existing and planned land uses identified in the Land Use Element from excessive noise. Based on

Table N-2 of the Noise Element, parks and recreation areas are compatible with exterior noise levels up to 70 dB(A) L_{eq} . The project site is mostly surrounded by agricultural uses, and government uses are located to the east. None of these uses generate noise levels that would exceed 70 dB(A) L_{eq} . Additionally, based on Noise Element future traffic noise contours, traffic noise levels are well less than 70 dB(A) L_{eq} in the vicinity of the project site. Therefore, the project would be compatible with City standards.

On-Site Generated Noise

City Code of Ordinances Section 17.1, also known as the Noise Abatement and Control Ordinance, specifies noise level limits for on-site noise sources. Noise level limits are summarized in Table 6.

Table 6 City of El Centro Noise Abatement and Control Ordinance Noise Level Limits		
Zone*	Time of Day	One-Hour Average Sound Level [dB(A) L_{eq}]
Single-family Residential Zones	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
Multiple-family Residential Zones	7:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial, Civic, and Limited Use Zones	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	55
Manufacturing Zones	7:00 a.m. to 10:00 p.m.	75
	10:00 p.m. to 7:00 a.m.	70
SOURCE: City Code of Ordinances Section 17.1-4. *The zone which exists on the abutting or nearby property at whose boundary the measurement is taken. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. If the measured ambient sound level exceeds the applicable limit shown, the allowable sound level shall be the ambient noise level minus 5 dB, but not less than the sound level limit specified above.		

Imperial County Code of Ordinances Title 9, Division 7: Noise Abatement and Control, specifies similar noise level limits. Noise level limits are summarized in Table 7.

Table 7
Imperial County Property Line Noise Limits

Zone*	Time of Day	One-Hour Average Sound Level [dB(A) L_{eq}]
Residential Zones	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 45
Multi-Residential Zones	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 50
Commercial Zones	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55
Light Industrial/Industrial Park Zones	Anytime	70
General Industrial Zones	Anytime	75
SOURCE: Imperial County Noise Abatement and Control Ordinance		

Once operational, on-site sources of noise would include soccer activities that would consist of players, spectators, and referee whistles. As discussed, there are no noise sensitive uses in the immediate vicinity of the project site. The nearest residential use is located more than 1,000 feet from the project site. Based on noise measurements conducted at soccer fields during active games, soccer activities would generate a noise level of approximately 59 dB(A) L_{eq} at 50 feet (AECOM 2018). This noise level would attenuate to 33 dB(A) L_{eq} at the nearest residential use. Additionally, noise levels would not exceed 60 dB(A) L_{eq} at the adjacent government uses to the east. Noise levels would not exceed the Noise Abatement and Control Ordinance noise level limits, and noise impacts due to on-site generated noise would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
j. Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. Construction activities would have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. Based on several federal studies, the threshold of perception is 0.035 inch per second (in/sec) peak particle velocity (PPV), with 0.24 in/sec PPV being a

distinctly perceptible (Caltrans 2013b). Neither cosmetic nor structural damage of buildings occurs at levels below 0.1 in/sec PPV.

Project construction equipment used during site grading and excavation would have the greatest potential to generate vibrations that would affect nearby residential land uses. Construction equipment may include loaded trucks, excavators, dozers and loaders. Vibration levels from these pieces of equipment would generate vibration levels with a PPV ranging from 0.035 to 0.089 in/sec PPV at 25 feet. There are no sensitive receivers in the vicinity of the project site, and the nearest structure is located more than 25 feet from the project site. This range of construction vibration levels would be below the distinctly perceptible threshold of 0.24 in/sec PPV and below the cosmetic and structural damage of buildings threshold of 0.1 in/sec PPV. Therefore, project construction would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

Once operational, the project would not be a source of groundborne vibration.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
k. 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 area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The project is located approximately 5 miles south of the Imperial County Airport and 7 miles southeast of NAF El Centro. The project site is located outside the affected noise areas for these airports. Therefore, noise impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XIV. POPULATION/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 roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. The proposed project would develop 63 acres consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The project would not include the development of new homes or businesses. As described in the Traffic Impact Analysis (Linscott, Law & Greenspan [LLG] 2020), the

project is expected to generate a total of 945 weekday daily trips, and a total of 5,281 weekend daily trips. However, these trips are expected to be from travelers located outside the city. Thus, impacts regarding population growth would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

No Impact. The project site consists of agricultural lands. Therefore, development of the proposed project would not displace substantial numbers of existing people or housing and no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XV. PUBLIC SERVICES

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

- | | | | | |
|--------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| i) Fire Protection | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. The project site is served by the City of El Centro Fire Department. The City currently operates three fire stations: Fire Station No.1, located at 775 State Street, Fire Station No. 2, located at 900 Dogwood, and Fire Station No. 3, located at 1910 North Waterman Avenue, which is also the Fire Department headquarters. The department consists of 41 safety members and three administrative assistants. The department is led by a Chief and four Battalion Chiefs.

The proposed project would develop 63 acres consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The size of the project would not pose a significant fire impact and the project proponent would be required to pay fire impact fees pursuant to the City's Municipal Code Section 20-102 to offset any impacts. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii) Police Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The project site and surrounding properties are served by the El Centro Police Department. The El Centro Police Department is located at 150 North 11th Street and comprises 52 officers, including: Chief of Police, Deputy Chief, two commanders, eight sergeants, and 40 police officers. The department also has an active reserve officer program, a police auxiliary team program, and an explorer program. Currently, there are 27 civilian employees assigned to records, communication, evidence, animal control, crime prevention, community service officer, crime analysis unit, computer information services, and parking enforcement. In August 1996, the department expanded and now has a community-oriented police office, crime prevention specialist, training office, and volunteer services office located at the community center substation. In addition, the department has two school resource officers. One officer is permanently assigned to high schools (Central and Southwest) and the second officer is assigned to the junior high schools.

The Police Department's goal is to have 1.75 police officers per 1,000 population. Response to calls for service is prioritized based on urgency and need. According to the United States Census Bureau, from 2013-2017 the City of El Centro averaged 3.65 persons per household. As discussed in Section XIV. Population/Housing, the project would not increase the City's population. The project proponent will be required to pay police impact fees pursuant to the City's Municipal Code Section 20 102 to offset any impacts. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. As discussed in Section XIV. Population/Housing, the project would not increase the City's population. Thus, impacts to schools would not occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. There are currently 13 parks within the city. To ensure sufficient parks and recreational opportunities to meet the City's needs, the City's goal is to provide five acres of developed public parkland per 1,000 residents. Since the project park space would not be owned or maintained by the City, its acreage cannot be counted towards the developed parkland standard. However, it would still serve to meet the City's goal of ensuring recreational opportunities to residents.

The proposed project consists of a regional soccer and wellness park consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The project would establish a major outdoor recreational facility in the community. Thus, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Impacts to other public facilities would not be anticipated (e.g., libraries). No impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XVI. RECREATION

- 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?

☐ ☐ ☐ ☒

No Impact. The proposed project consists of a regional soccer and wellness park consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The project would add to the existing regional parks and recreational facilities in the community. Thus, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed project consists of a regional soccer and wellness park consisting of 13 full-size soccer fields, two youth soccer fields, a wellness loop, restrooms, a field house, a ticket booth, a dining area, a recreational area, parking and a sustainable organic farm/orchard. The project would add to the existing regional parks and recreational facilities in the community. Thus, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XVII. TRANSPORTATION

Would the project?

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

☐☐☒☐

A Traffic Impact Analysis (TIA) dated December 17, 2020, was prepared by LLG for the proposed project and can be found as Appendix G.

Less than Significant Impact. As described in the TIA (2020), the project is expected to generate a total of 945 weekday daily trips, with 219 trips in the weekday PM peak hour (143 inbound, 76 outbound) and a total of 5,281 weekend daily trips, with 526 trips in the weekend mid-day peak (253 inbound, 273 outbound).

The surrounding roadway network has the capacity to handle the project-related trip generation. Therefore, the project would not conflict with a program plan (e.g., General Plan Circulation Element), ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

☐☐☐☒

No Impact. In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions. The VMT standard for evaluating transportation impacts under CEQA became mandatory statewide on July 1, 2020.

VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMT is a measure of the use and efficiency of the transportation network. VMTs are calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (round trip) travel and is typically estimated on a weekday for the purpose of measuring potential transportation impacts.

Since the City of El Centro has not yet formally developed draft guidelines or adopted significance criteria and technical methodologies for VMT analysis, LLG utilized the Office of Planning and Research (OPR) guidance from the Technical Advisory and Caltrans Regional Guidelines to develop significance thresholds and technical methodologies for this project. Guidance from OPR's Technical Advisory is used to establish a significance threshold of a minimum 15 percent reduction or more from the regional average VMT per employee for this project evaluation. That means that if the project's VMT per employee is more than 15% below the regional average, no significant transportation impact would result.

Caltrans provides a Transportation Analysis Zone (TAZs) map which provide information for each zone. The Project site is located in the County of Imperial which includes total 17 zones representing the Imperial Region. Table 8 tabulates the overall average regional VMT per employee and the threshold.

Table 8	
Regional VMT Per Employee and Threshold	
Region	Threshold¹
26.06 ²	22.15
¹ Based on 15 percent below the regional VMT average. ² Regional VMT calculation is provided in Appendix G.	

Caltrans guidelines suggest that the VMT analysis is recommended based on the project location and zoning. The project site is located in Traffic Analysis Zone (TAZ) 5608. The VMT per employee for TAZ 5608 is 23.5. The project is a recreational project located in a VMT efficient area (15 percent or more below the base year average VMT/employee) based on the applicable location-based California Statewide Travel Demand Model database produced by Caltrans.

It should be noted that the project is located within the TAZ in an area with high accessibility to destinations (i.e., downtown, Interstate 8 major job centers). Therefore, VMT per employee is calculated for adjustment associated with a particular measure is the latest edition of the CAPCOA's Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures report (2010; CAPCOA Report). The CAPCOA Report provides a methodology to quantify the reductions in VMT for a variety of measures.

CAPCOA Measure LUT 4 Increase Destination Accessibility is applicable for projects in a suburban area. The distance from the project site to Downtown El Centro is 3.2 miles and the average distance from dwelling units in Transportation Analysis Zone number 5608 to Downtown El Centro is 5.4 miles. Based on the analysis approach described, the VMT reduction for destination accessibility measure and the final VMT reduction 19.07 miles (Table 9).

Table 9 Project Feature VMT Adjustments	
Destination Accessibility	Miles
Distance to Downtown or Job Center for the Project	3.2
Distance to Downtown or Job Center for the Zone # 56081	5.4
Total VMT Adjustment ¹	(2.2)
VMT for Zone (5608)	23.5
Final Project Adjusted VMT	19.07
¹ The total adjustment is calculated based on average length to downtown from each occupied parcel in the TAZ #5608.	

As shown in Table 10, the project's VMT per employee is calculated to be less than the threshold established.

Table 10 VMT Per Employee Comparison			
Region	Threshold ¹	Project	Significant Transportation Impact?
26.06	22.15	19.07	No
¹ Based on 15 percent below the regional VMT average.			

Therefore, the project would be consistent with CEQA Guidelines section 15064.3 and no transportation impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The project proposes to construct frontage improvements along McCabe Road and Sperber Road. The project would also widen Sperber Road on the west side of the street. Additionally, as part of the ICOE project, an eastbound right-turn deceleration lane is currently being constructed on McCabe Road at Sperber Road. These roadways improvements do not include any curves or dangerous intersections that would directly or cumulatively increase hazards due to a geometric design feature or incompatible uses. Therefore, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Access to the project parking area is proposed via Sperber Road. The project would also widen Sperber Road on the west side of the street. Additionally, as part of the ICOE project, an eastbound right-turn deceleration lane is currently being constructed on McCabe Road at

Sperber Road. These roadway improvements would improve emergency response and emergency evacuation. Therefore, no impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES

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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less than Significant Impact. A letter was sent to the NAHC in Sacramento on October 22, 2020 requesting a search of their Sacred Lands File. The NAHC replied on November 4, 2020, indicating that they had no record of Native American cultural resources in the immediate area of the project.

The integrity of the project site has been compromised through agricultural operations. Consequently, it is considered unlikely that unknown archaeological resources would be encountered during project construction. Therefore, development as a result of the project would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XIX. UTILITIES/SERVICE SYSTEMS

Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. According to the City's Sewer Master Plan (Carollo Engineers 2008) and a Water, Wastewater, and Storm Water Rate Study (Dynamic Consulting Engineers, Inc. 2012), the City treats its own wastewater at the El Centro Wastewater Facility, which has a capacity to accommodate 8.0 million gallons of wastewater per day. In addition, the City's wastewater demand has been decreasing despite continued growth in the City, and the City is anticipated to continue to have increased connections at a rate of 1 percent per year. Therefore, the project is not anticipated to result in an exceedance of treated wastewater amounts that would go back into the City's wastewater system. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Less than Significant Impact. The City of El Centro receives its water supply from the IID. The IID has adopted an Interim Water Supply Policy (IWSP; IID 2009) for new non-agricultural projects. The IWSP sets aside 25,000 acre-feet of water per year of Colorado River water supply to serve IWSP. The project site would also be serviced by the City of El Centro's treated water supply. As stated above, the City's water is provided by the IID. Per the Water System Master Plan (Carollo Engineers 2008), the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year. Considering a possible projected potable water demand of 50 acre-feet of water per year, the project is not anticipated to require a need for additional entitlements. Thus, the City would have enough water supplies available to serve the site. Considering the above-mentioned factors, the project would have sufficient water supplies, and a less than significant impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provided which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. See response for Utilities/Service Section XIX(a). Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

Less than Significant Impact. Solid waste service to the site is provided by CR&R Waste Services, who has a material recovery, transfer, and disposal center located in the City (599 East Main Street). CR&R owns and operates the South Yuma County Landfill (SYCL) in Arizona and currently transports all waste from El Centro to the SYCL. No waste is disposed in Imperial County. The City of El Centro has renewed its contract with CR&R through 2027. The total design/permitted capacity for the SYCL is 46,825,430 cubic yards. Currently, the landfill is operating in Phase I of its development, which has a design/permitted capacity of 19,305,000 cubic yards. Currently, the SYCL under Phase I of its development has more than 14 million cubic yards of remaining capacity (Maria Lazaruk, pers. comm. 10/18/2018).

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (AB 939), which mandated that all cities reduce waste disposed of in landfills from generators within their borders by 50 percent by the year 2000. Recently chaptered AB 341 has increased the diversion target to 75 percent (CalRecycle 2015). The City of El Centro has Municipal Code regulations to ensure compliance with these targets. These regulations include Municipal Code Chapter 12, Articles I and II requires collection, transportation, and disposal of solid waste and green waste. The proposed project would be required to comply with these regulations.

Since the project consists of a regional soccer and wellness park, solid waste generated by the project would be minimal. Further, compliance with recycling regulations and CR&R would continue to transport solid waste to the SYCL, which has capacity to accept the waste generated by the project would reduce any impacts to a level less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. See response for Utilities/Service Section XIX(d). Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XX. WILDFIRE

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"/>
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No Impact. The City of El Centro SEMS MHFP addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The proposed project would not substantially impair the SEMS MHFP. Additionally, because Thresholds XIX(a) through XIX(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones," no impacts related to these thresholds would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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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"/>
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No Impact. The project site does not contain steep slopes that may exacerbate the risk of wildfire. The project site and surrounding areas are designated by the California Department of Forestry and Fire Protection (CAL FIRE; 2020) as Moderate Fire Hazard Severity Zone and within a local responsibility area. As described in Public Services XV(i), the project would be issued a development impact fee which includes financing the Fire Department. Additionally, because Thresholds XIX(a) through XIX(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones," no impacts related to these thresholds would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

No Impact. As previously described, the proposed project is not within a designated Very High Fire Hazard Severity Zone (VHFHSZ), as defined by CAL FIRE (2020). Any new utility infrastructure at the site would be constructed in accordance with all applicable regulatory standards and would not exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Additionally, because Thresholds XIX(a) through XIX(d) apply only to those projects that are “located in or near state responsibility areas or lands classified as very high fire hazard severity zones,” no impacts related to these thresholds would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. As previously described, the proposed project is not within a designated VHFHSZ, as defined by CAL FIRE (2020). Specifically, implementation of the 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 impacts would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- e. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ ☒ ☐ ☐

Less than Significant with Mitigation Incorporated. Project construction has the potential to impact active burrowing owl burrows and/or raptor nests. Implementation of Mitigation Measures BIO-1 and BIO-2 identified in Section 3.0, would reduce potential impacts to a level less than significant. Refer to Section IV, Biological Resources, for additional details.

Impacts to historical, archaeological and tribal cultural resources would be less than significant. Refer to Section V, Cultural Resources, and Section XVIII, Tribal Cultural Resources for additional details.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?

☐ ☐ ☒ ☐

Less than Significant Impact. The proposed use would be consistent with the City’s planning policies and the regional planned growth. Additionally, operational emissions would be less than the applicable thresholds for all criteria pollutants. The project would not result in a cumulatively considerable net increase of criteria pollutants, and operational impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact. The proposed project would not create conditions that would significantly impact human beings. Impacts would be less than significant.

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APPENDICES

Under Separate Cover