



---

## **NOTICE OF PREPARATION OF DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING FOR THE RANCHO LOS LAGOS SPECIFIC PLAN**

**Date:** December 10, 2024

**To:** Responsible and Trustee Agencies, Organizations, and Interested Parties

**From:** City of Brawley

**Contact:** Jimmy Duran, City Manager  
City of Brawley  
205 South Imperial Avenue  
Brawley, CA 92227  
jduran@brawley-ca.gov

**Subject:** **Notice of Preparation of a Draft Supplemental Environmental Impact Report and  
Notice of Public Scoping Meeting for the Rancho Los Lagos Specific Plan**

The City of Brawley (City) will prepare a Draft Supplemental Environmental Impact Report (Draft Supplemental EIR) to the Rancho Los Lagos Specific Plan EIR, which was certified by Imperial County in 2009 (State Clearinghouse No. 2007071107) to evaluate the proposed Rancho Los Lagos Specific Plan (proposed project). The County does not have any approval authority over the project and the statute of limitations for challenging the County's certification of the EIR and approval of the Specific Plan has passed. The project site would be annexed into the City as a part of the proposed project and the City will be the Lead Agency under the California Environmental Quality Act (CEQA) in accordance with CEQA Guidelines Section 15052. Imperial County Local Agency Formation Commission (LAFCo) will serve as a responsible agency.

The City hereby solicits comments and suggestions from responsible and trustee agencies, other organizations and interested parties, and members of the public regarding (1) the scope and content of the Draft Supplemental EIR and (2) the significant environmental issues and reasonable alternatives and mitigation measures that should be addressed in the Draft Supplemental EIR (pursuant to CEQA Guidelines § 15082). This Notice of Preparation also provides notice that a public scoping meeting will be

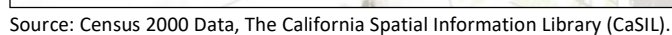
held on December 16, 2024, to gather public input on the scope and content of the environmental review for the proposed project. The proposed project is briefly summarized below.

In accordance with CEQA Guidelines Section 15082(b), the City requests review from public agencies that will need to rely on the Draft Supplemental EIR prepared by the City when considering any permit or other approval for the proposed project as to the scope and content of the environmental information in the Draft Supplemental EIR that is germane to the agency's statutory responsibilities in connection with the proposed project.

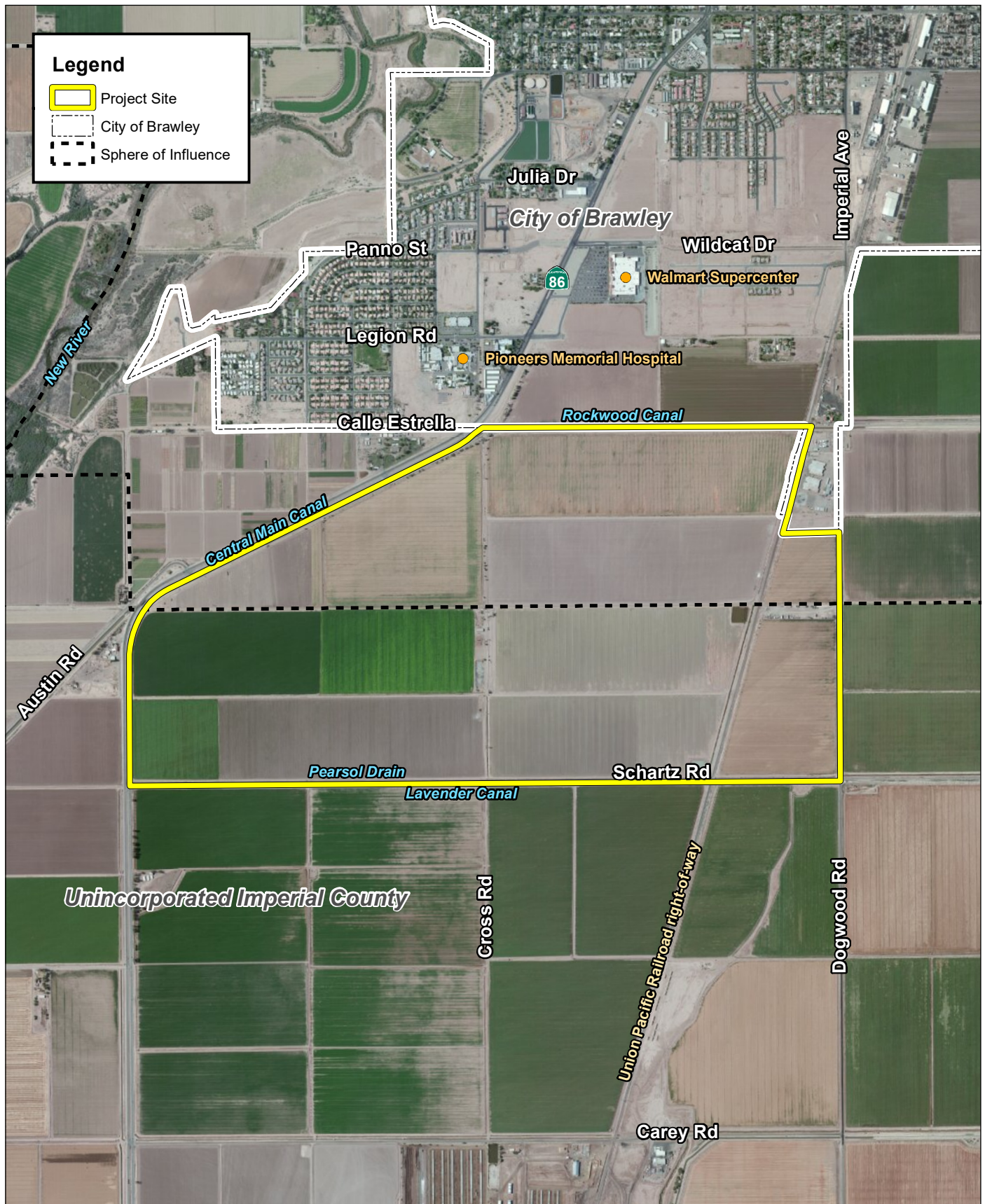
The City also requests comments and concerns from organizations and interested parties regarding the scope and content of the environmental review for the proposed project.

**Project Title:** Rancho Los Lagos Specific Plan

**Project Location:** The project site is an approximately 1,076-acre site located in the Imperial Valley region of unincorporated Imperial County, California, adjacent to the southern border of the City of Brawley, within the City's Sphere of Influence (SOI). The project site would be annexed into the City as a part of the proposed project. The project site is generally bounded by Rockwood Canal and the City's southern boundary to the north, Dogwood Road to the east, State Route (SR) 86 and the Central Main Canal to the west, and Pearsol Drain and Schartz Road to the south. See attached Exhibit 1 through Exhibit 3. The project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.



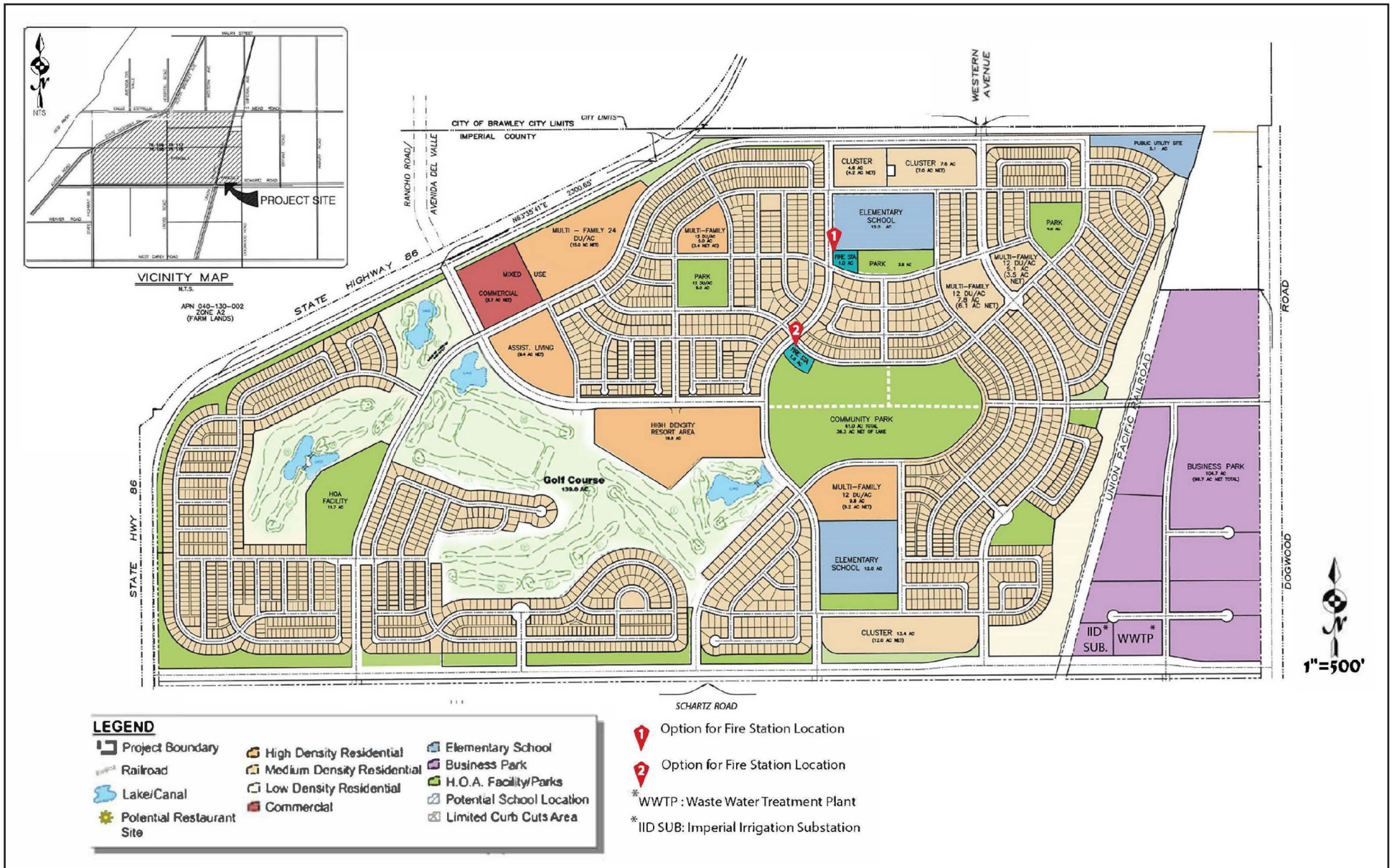




Source: ESRI Aerial World Imagery.







Source: Dubose Design Group.

**Project Description:** The Rancho Los Lagos Specific Plan EIR was certified by Imperial County in 2009 (State Clearinghouse No. 2007071107) and the Specific Plan was subsequently approved by Imperial County in 2012. However, the project did not move forward at that time.

Current entitlement efforts for the proposed project include modifications to the previously approved Specific Plan, and annexation of the site into the City. The proposed project is designed to be a pedestrian-oriented residential community. In addition to residential areas, the proposed project would also include a golf course, several public parks, commercial and retail development, a fire station, schools, and the Industrial Business Park. A resort hotel and spa are also planned. A summary of the project's components is provided in Table 1 below.

**Table 1: Land Use Summary**

Land Use	Approximate Gross Acres	Percent of Total Area (%)	Dwelling Units	Phase 1 Units	Phase 2 Units
<b>Single-family Residential</b>					
Low Density Single-family	182	16.9%	837	337	500
Medium Density Single-family	132	12.3%	991	243	748
<b>Single-family Subtotal</b>	<b>314</b>	<b>29.2%</b>	<b>1,828</b>	<b>580</b>	<b>1,248</b>
<b>Multi-family Residential</b>					
High Density Multi-family (12-24 du/ac)	43	4.0%	894	115	779
Resort Hotel and Spa (381 rooms) <sup>1</sup>	20	—	—	—	—
High Density Assisted Living (12-24 du/ac)	9	0.9%	169	—	169
<b>Multi-family Subtotal</b>	<b>72</b>	<b>6.7%</b>	<b>1,063</b>	<b>115</b>	<b>948</b>
<b>Active Adult (or Conventional) Gated Community Residential</b>					
Low Density Single-family	77	7.2%	429	—	429
Medium Density Single-family	77	7.2%	510	—	510
<b>Gated Community Subtotal</b>	<b>154</b>	<b>14.3%</b>	<b>939</b>	<b>—</b>	<b>939</b>
<b>RESIDENTIAL SUBTOTAL</b>	<b>540</b>	<b>50.2%</b>	<b>3,830</b>	<b>695</b>	<b>3,135</b>
<b>Nonresidential Uses</b>					
Industrial Business Park—M1	67	6.2%	—	25	42
Industrial Business Park— M2	30	2.8%	—	0	30
Infrastructure Streets and IID Easements	82	7.7%	—	22	61
Public Utility Yard	6	0.6%	—	6	0
Commercial Mixed-Use	9	0.8%	—	0	9
Specialty Commercial at Community Park	(3-acres included in Community Park acreage)			0	0

<sup>1</sup> An alternative to the Resort Hotel and Spa would be High Density Multi-Family housing.

Land Use	Approximate Gross Acres	Percent of Total Area (%)	Dwelling Units	Phase 1 Units	Phase 2 Units
Elementary	24	2.2%	–	12	12
<b>NONRESIDENTIAL USES SUBTOTAL</b>	<b>219</b>	<b>20.3%</b>	<b>–</b>	<b>65</b>	<b>154</b>
<b>Open Space/Recreation</b>					
Parks (including lakes)	70	6.5%	–	17.5	52.5
Open Space/Buffers	96	8.9%	–	18	78
Executive Golf Course (including lakes)	139	12.9%	–	0	139
Active Adult (or Conventional) Gated Community HOA Recreation Complex	12	1.1%	–	0	12
<b>OPEN SPACE/RECREATION SUBTOTAL</b>	<b>317</b>	<b>29.6%</b>	<b>–</b>	<b>36</b>	<b>281</b>
<b>GRAND TOTAL</b>	<b>1,076</b>	<b>100%</b>	<b>3,830</b>	<b>716</b>	<b>3,649</b>

**Potential Environmental Effects:** The proposed project would constitute a change to the previously approved Specific Plan. Therefore, the Draft Supplemental EIR will evaluate whether any new or substantially more severe impacts on the environment would result from the project changes, compared to the environmental impacts disclosed in the previously certified EIR. The Draft Supplemental EIR will also incorporate applicable mitigation measures identified in the previously certified EIR and will evaluate whether modifications to those mitigation measures or new mitigation would be needed to reduce potential impacts.

As stated in CEQA Guidelines, Section 15163(b), the supplement to the EIR need only contain information necessary to make the previous EIR adequate for the project, as revised. The Draft Supplemental EIR is intended to serve as a supplement to the previously certified EIR. Impacts and conditions presented in the previously certified EIR will serve as the primary base of evaluation for the analysis. Elements of the prior analysis that are unchanged will not be reiterated in the Draft Supplemental EIR. Based on the attached Initial Study prepared for the proposed project, the City will address the following potential impacts in the Draft Supplemental EIR: Air Quality; Biological Resources; Cultural Resources; Greenhouse Gas Emissions; Noise; Population and Housing; Public Services; Transportation; and Utilities and Service Systems. Based on site-specific characteristics, the proposed project is not anticipated to have a significant impact on Energy, Land Use and Planning, Tribal Cultural Resources, and Wildfire.

Aesthetics, Agricultural Resources Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, and Recreation have been determined to not require any new analysis. A summary discussion of those areas for which impacts remain the same or would be lessened is provided in the attached Initial Study and will be incorporated by reference in the Draft Supplemental EIR.



**Document Availability:** A copy of the Initial Study is available for review on the City website (<https://www.brawley-ca.gov/section/Planning>) and at the following location:

City of Brawley  
Planning Department  
383 Main Street  
Brawley, CA 92227

**Public Review Period:** This Notice of Preparation is available for public review and comment pursuant to the California Code of Regulations, Title 14, Section 15082(b) for 30 days. The comment period for the Notice of Preparation begins December 10, 2024, and ends January 9, 2025. Because of the limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

**Comments Requested:** The purpose of this notice is to request input regarding the scope and content of the environmental information that should be included in the Draft Supplemental EIR. This notice has been sent to responsible and trustee agencies, property owners and occupants on properties within a 1,000-foot radius of the project site, and interested parties, and has been published on the City website: <http://www.brawley-ca.gov>.

Please send your comments to the address below. Please include a name and contact information with your response.

Jimmy Duran  
City Manager  
City of Brawley  
205 South Imperial Avenue, Brawley, CA 92227  
[jduran@brawley-ca.gov](mailto:jduran@brawley-ca.gov)

**Scoping Meeting:** The City will hold a scoping meeting at 6:00 p.m. on December 16, 2024, at the City Council Chambers at 338 Main Street in Brawley. All interested parties are welcome to attend and present environmental information or concerns to be addressed in the Draft Supplemental EIR, either as oral or written testimony.

The purpose of the scoping meeting is for the City to provide an overview of the proposed project and receive input regarding the scope and content of the environmental information that should be included in the Draft Supplemental EIR. This Notice of Preparation and attachments are available for review at the City's website: <http://www.brawley-ca.gov>.

**Attachment A:** Rancho Los Lagos Specific Plan Initial Study

**Attachment A:**  
**Rancho Los Lagos Specific Plan Initial Study**

**DRAFT**  
**Rancho Los Lagos Specific Plan**  
**Initial Study**  
**City of Brawley, Imperial County, California**



Prepared for:  
**City of Brawley**  
383 Main Street  
Brawley, CA 92227  
760.351.3048

Contact: Jimmy Duran, City Manager

Prepared by:  
**FirstCarbon Solutions**  
967 Kendall Drive, #A-537  
San Bernardino, CA 92407  
714.508.4100

Contact: Jason Brandman, Project Director  
Cecilia So, Senior Project Manager

Report Date: December 9, 2024



THIS PAGE INTENTIONALLY LEFT BLANK

## Table of Contents

<b>Acronyms and Abbreviations .....</b>	<b>v</b>
<b>Section 1: Introduction .....</b>	<b>1</b>
1.1 - Purpose.....	1
1.2 - Project Location and Setting.....	2
1.3 - Environmental Setting .....	7
1.4 - Project Description .....	19
1.5 - Intended Uses of this Document.....	37
<b>Section 2: Environmental Checklist and Environmental Evaluation .....</b>	<b>39</b>
2.1 Aesthetics .....	40
2.2 Agriculture and Forestry Resources .....	46
2.3 Air Quality.....	51
2.4 Biological Resources .....	57
2.5 Cultural Resources and Tribal Cultural Resources .....	64
2.6 Energy.....	69
2.7 Geology and Soils .....	71
2.8 Greenhouse Gas Emissions .....	80
2.9 Hazards and Hazardous Materials .....	82
2.10 Hydrology and Water Quality .....	90
2.11 Land Use and Planning .....	99
2.12 Mineral Resources .....	102
2.13 Noise.....	104
2.14 Population and Housing .....	107
2.15 Public Services .....	109
2.16 Recreation .....	115
2.17 Transportation .....	117
2.18 Utilities and Service Systems .....	120
2.19 Wildfire.....	126
2.20 Mandatory Findings of Significance .....	129
<b>Section 3: List of Preparers.....</b>	<b>133</b>
 <b>Appendix A: Biological Supporting Information</b>	
<b>Appendix B: Geologic and Geotechnical Hazard Report</b>	
<b>Appendix C: Phase I Environmental Site Assessment</b>	
<b>Appendix D: Public Service Letters</b>	

## List of Tables

Table 1: Land Use Summary from the Certified EIR .....	19
Table 2: Proposed Land Use Summary .....	23
Table 3: Comparison of the Certified EIR to the Proposed Project .....	24
Table 4: Industrial Business Park Land Uses .....	27

## List of Exhibits

Exhibit 1: Regional Location Map.....	3
Exhibit 2: Local Vicinity Map .....	5
Exhibit 3: City of Brawley General Plan Land Use Map.....	9
Exhibit 4: City of Brawley Zoning Map .....	11
Exhibit 5: Imperial County General Plan Land Use Map .....	13
Exhibit 6: Imperial County Zoning Map.....	15
Exhibit 7: Existing Site Map .....	17
Exhibit 8: Site Plan Map .....	21
Exhibit 9: Circulation Plan .....	29
Exhibit 10: Pedestrian and Bicycle Circulation Plan .....	33



## ACRONYMS AND ABBREVIATIONS

µg/m <sup>3</sup>	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
A-1	Light Agriculture
A-2U	Agriculture-Urban Area
ACM	asbestos-containing material
APN	Assessor's Parcel Number
AQAP	Air Quality Attainment Plan
ARB	California Air Resources Board
BAU	business-as-usual
BMP	Best Management Practice
BPD	Brawley Police Department
BUHSD	Brawley Union High School District
BUOW	Burrowing Owl
CalEEMod	California Emissions Estimator Model
CalGEM	California Department of Oil, Gas, and Geothermal Resources
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGB	California Green Builder Program
CGS	California Geologic Survey
CNEL	Community Noise Equivalent Level
CHP	California Highway Patrol
CNDDDB	California Natural Diversity Database
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CSA	County Service Area
CWA	Clean Water Act
DB	decibel
DPM	diesel particulate matter

DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmentally Sensitive Area
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
Geotechnics	Geotechnics Inc.
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HOA	Homeowner's Association
ICAPCD	Imperial County Air Pollution Control District
ICFD	Imperial County Fire Department
ICSO	Imperial County Sheriff's Department
IID	Imperial Irrigation District
IS	Initial Study
IVWMTF	Imperial Valley Waste Management Task Force
IWMB	Integrated Waste Management Board
LAFCo	Local Agency Formation Commission
LBP	lead-based paint
LEA	Local Enforcement Agency
L <sub>eq</sub>	equivalent sound level
LESA	Land Evaluation and Site Assessment
LRA	Local Responsibility Area
LST	Local Significance Thresholds
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MOU	Memorandum of Understanding
mph	miles per hour
MT	metric tons
MUTCD	Manual on Uniform Traffic Control Devices
NAHC	Native American Heritage Commission
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant System Discharge Permit
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration

PA	Planning Area
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
REC	Recognized Environmental Conditions
RME	City of Brawley General Plan Resource Management Element
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SDS	Safety Data Sheets
SoCalGas	Southern California Gas Company
SOI	Sphere of Influence
SO <sub>x</sub>	sulfur oxides
SP	Specific Plan
SR	State Route
SSAB	Salton Sea Air Basin
SSC	Species of Special Concern
SSPWC	Standard Specifications for Public Works Construction
State Water Board	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
US DOT	United States Department of Transportation
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WQMP	Water Quality Management Plan
WTP	Water Treatment Plant
WWTP	Wastewater Treatment Plant
ZOI	Zone of Influence



THIS PAGE INTENTIONALLY LEFT BLANK

## SECTION 1: INTRODUCTION

### 1.1 - Purpose

Rancho Los Lagos, LLC (applicant) proposes to develop the Rancho Los Lagos Specific Plan (proposed project). An Environmental Impact Report (EIR) for the Rancho Los Lagos Specific Plan (Specific Plan), prepared by FirstCarbon Solutions (FCS) (formerly Michael Brandman Associates), was certified by Imperial County in 2009 (State Clearinghouse No. 2007071107, Certified EIR). The Certified EIR recognized that the Specific Plan was within the Sphere of Influence of the City. The Specific Plan was subsequently approved by Imperial County in 2012. However, the project did not move forward at that time. The applicant has re-initiated entitlement efforts for the proposed project, which includes modifications to the Specific Plan. The California Environmental Quality Act (CEQA) provides a process for supplemental environmental review to address changes made to a project previously analyzed under CEQA. Once “an environmental impact report has been prepared for a project,” CEQA Section 21166 provides that, “no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency,” unless one of three circumstances apply: (1) substantial changes to the approved project will require major revisions to the Certified EIR, (2) substantial changes occur with respect to the circumstances under which the approved project is being undertaken which will require major revisions to the Certified EIR, or (3) new information becomes available that was not known and could not have been known at the time the EIR for the approved project was certified.

Consistent with CEQA Guidelines Section 15063(c)(7), the overall purpose of this Initial Study is to identify any potential environmental impacts associated with the construction and implementation of the proposed project within the Sphere of Influence (SOI) of the City of Brawley, California that would result in any new, or an increase in the severity of, significant impacts previously identified in the Certified EIR. This Initial Study focuses on the unique characteristics of the proposed modifications to the Specific Plan that were not addressed in the Certified EIR. This Initial Study checklist (see Section 2) and supporting documents constitute substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR or Negative Declaration (ND) is not required to further evaluate impacts to Aesthetics, Agriculture and Forestry Resources, Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, and Recreation. For these sections, the prior EIR is incorporated by reference, and the Supplemental EIR will not provide additional information. Relevant mitigation identified in the prior EIR is identified and would be recommended for adoption and implementation and would be included in the Mitigation Monitoring and Reporting Program (MMRP) prepared for the proposed project. Because the City has approval authority over implementation of the proposed project as revised, and is assuming the role of Lead Agency, the City would assume responsibility to ensure verification and compliance with the mitigation measures. The remaining topical areas will be addressed in a Supplemental EIR.

The City was recognized in the Certified EIR as having potential future discretionary approval with respect to the Specific Plan. Accordingly, the City of Brawley may appropriately assume the Lead

Agency role for the purposes of evaluating the proposed modifications to the Specific Plan because following three conditions exist (14 California Code of Regulations [CCR] § 15052(a)):

The County properly certified an environmental impact report, but a subsequent EIR is required under Title 14 California Code of Regulations Section 15162;  
The County has granted a final approval for the project; and  
The statute of limitations for challenging the County's final approval has expired. (14 CCR § 15052(a)(2). See also 14 CCR § 15096(e)(3).)

The remainder of this section describes the project location and the primary project characteristics. Section 2 contains the environmental checklist that identifies the potential environmental impacts that could result from project construction and implementation, briefly discusses and substantiates each impact analysis and conclusion, and provides a final determination of significance for each potential impact. Where the Initial Study determines that the Certified EIR adequately addresses the proposed project's impacts concerning a topic, the Initial Study may conclude that further environmental review is not necessary. Topics identified as Potentially Significant or requiring additional evaluation in the Initial Study would be addressed in detail in a Supplemental EIR. Topics identified as resulting in no change from the analysis in the Certified EIR, or resulting in Less than Significant Impact or No Impact in this Initial Study, would be summarized in the Supplemental EIR as Impacts Found not to be Significant. Section 3 contains the List of Preparers. The Certified EIR is incorporated by reference into this document. A summary of the Certified EIR is provided in each topical discussion and the Certified EIR is available for review at <https://www.brawley-ca.gov/departments/development-services/planning>.

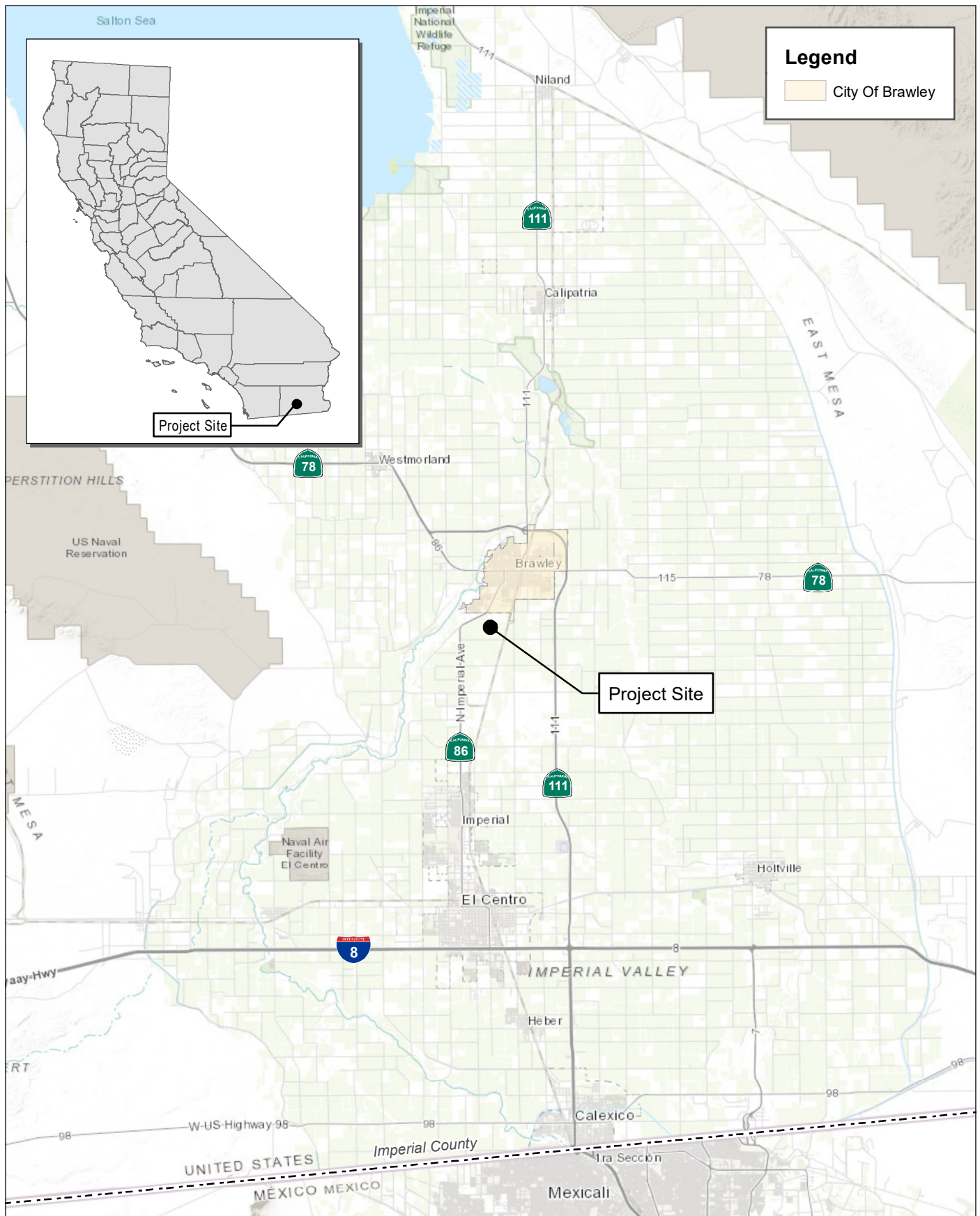
## 1.2 - Project Location and Setting

### 1.2.1 - Location

The Rancho Los Lagos Specific Plan Area (project site) is approximately 1,076 acres, located in the Imperial Valley region of unincorporated Imperial County, California, adjacent to the southern border of the City of Brawley (Exhibit 1). The project site is currently within the City's SOI and would be annexed into the City as part of the proposed project. The project site is generally bound by Rockwood Canal and the City's southern boundary to the north, Dogwood Road to the east, and State Route (SR) 86 and the Central Main Canal to the west, and Pearsol Drain and Schartz Road to the south (Exhibit 2).

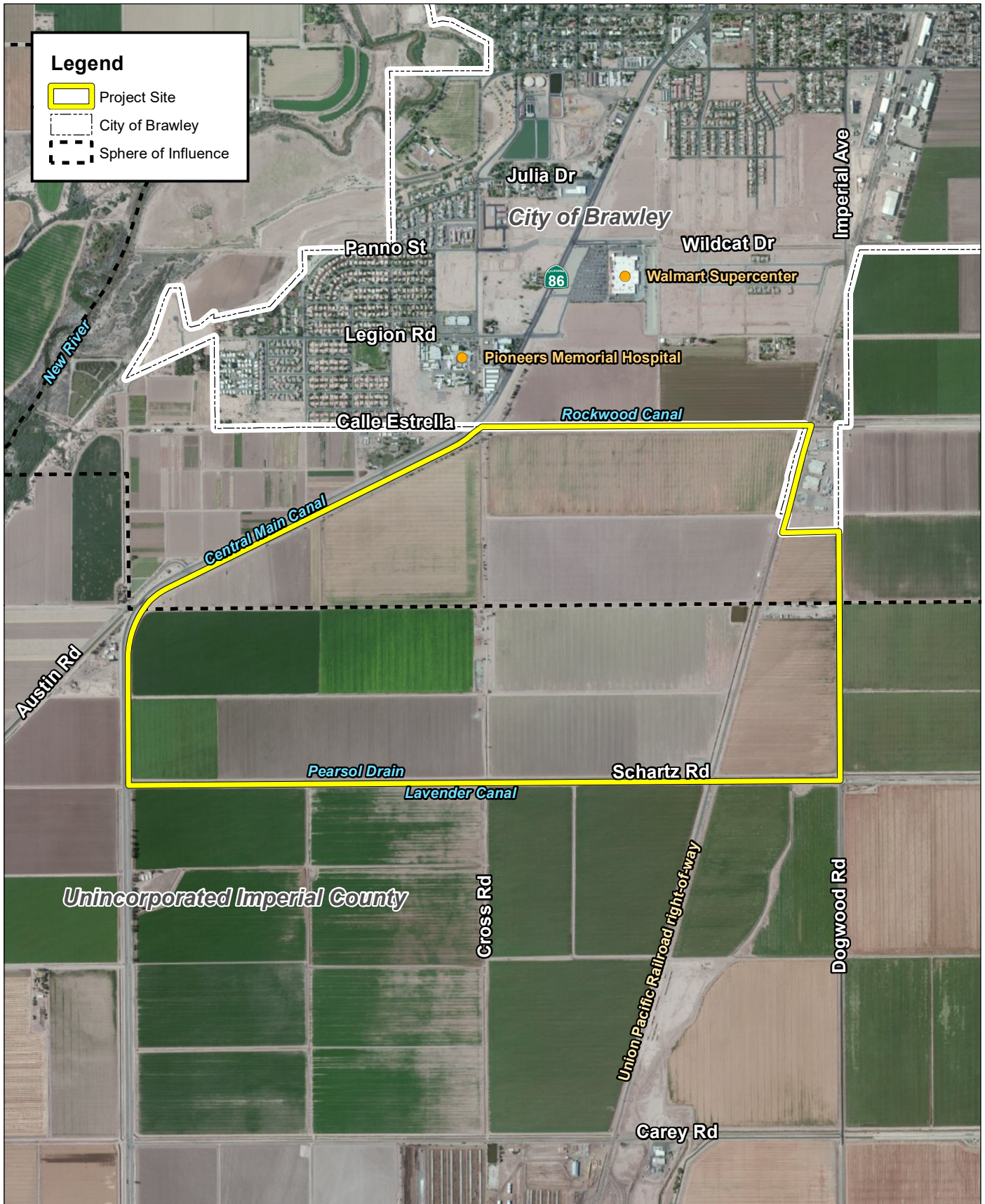
The project site consists of two parcels (Assessor's Parcel Number [APN] 040-130-010 and 040-130-012), bisected by the Union Pacific Railroad (UPRR) right-of-way. APN 040-130-010 is approximately 961 acres and is located west of the UPRR right-of-way, while APN 040-130-012 is approximately 115 acres and is located east of the UPRR right-of-way.

Regional access to the project site is provided by SR-86, SR-111, SR-78, and Interstate 8 (I-8). The project site is considered a transportation and growth corridor by the County because of its location between a Prime Arterial Roadway (I-8) and a State Route. Dogwood Road provides local access to the eastern portion of the project site.



THIS PAGE INTENTIONALLY LEFT BLANK





Source: ESRI Aerial World Imagery.



THIS PAGE INTENTIONALLY LEFT BLANK

## Surrounding Land Uses

Adjacent land uses are predominantly characterized by unincorporated, irrigated agricultural fields in active cultivation on the east, south, and west sides of the project site. Imperial County owns several easements associated with highways and roads adjacent to the project site.

### **West**

To the west, the project site is bounded by SR-86; the Central Main Canal, which flows parallel to SR-86; and unincorporated agricultural land. Additionally, the New River is located approximately 0.5 mile west of the project site.

### **North**

To the north, the project site is bounded by the Rockwood Canal; agricultural land, and the City's southern boundary. Urban development within the City occupies properties to the north of the project site. The Pioneers Memorial Hospital, a Walmart Supercenter, and a few residences are located just north of the project site.

### **East**

To the east, the project site is bounded by Dogwood Road and unincorporated land for agricultural and commercial use. A regional electrical substation and gas turbine peak load power station operated by Imperial Irrigation District (IID) and a private trucking operation are located on adjacent parcels at the northeast corner of the site, in the City of Brawley. SR-111 is located approximately 1.5 miles east of the project site.

### **South**

To the south of the project site is Schartz Road, Pearsol Drain, and Lavender Canal. The property along the southern boundary of the site, south of Schartz Road, is currently used for active agriculture and has an agricultural conservation easement.

## 1.3 - Environmental Setting

### 1.3.1 - Existing Site Conditions

The project site is characterized as generally flat with a very gentle slope downward to the southeast. The project site has no distinguishing natural features, although the manufactured canals bordering the site include portions of the historic IID canal system. The project site is actively cultivated for alfalfa and hay and contains canals and drains that are used to transport water to and from the various agricultural fields.

The project site is bordered on the east, south and west sides by irrigated agricultural land. There is a network of IID canals and drains present on-site and in the vicinity (Exhibit 2). There are four active irrigation canals on the project site: The Lavender Canal and Pearsol Drain are east–west oriented and are adjacent to Schartz Road on the southern boundary of the project site; the Rockwood Canal is east–west oriented and is adjacent to the northern boundary of the project site; and the Central Main Canal is north–south oriented and is adjacent to the SR-86 on the western boundary of the

project site. A reservoir basin formerly located in the center of the property is no longer in service. Several private auxiliary canals are located within the project site.

An equipment shed is located near the center of the project site. A former residence that was also located near the center of the project site was destroyed by the Brawley Fire Department during a training session in June or July of 2006.<sup>1</sup>

### 1.3.2 - Existing Land Use and Zoning

The northern portion of the project site is located within the City of Brawley's SOI (Exhibit 3). The northerly portion of the project site is designated as Agricultural in the City's 2008 General Plan Update (Exhibit 3), and is zoned Light Agricultural (A-1) (Exhibit 4).<sup>2</sup>

The remainder of the project site is outside of the City's SOI and is designated as Urban Area by the County General Plan (Exhibit 5) and zoned as RLL-SPA-Res (Rancho Los Lagos Specific Plan Area) by the County (Exhibit 6).<sup>3</sup>

The project site also contains several easements in favor of IID that are associated with existing canals, drains, and electrical lines; the easements will either be retained, vacated, or realigned as appropriate (Exhibit 7). Additionally, the County owns several easements associated with highways and roads adjacent to the proposed project site.

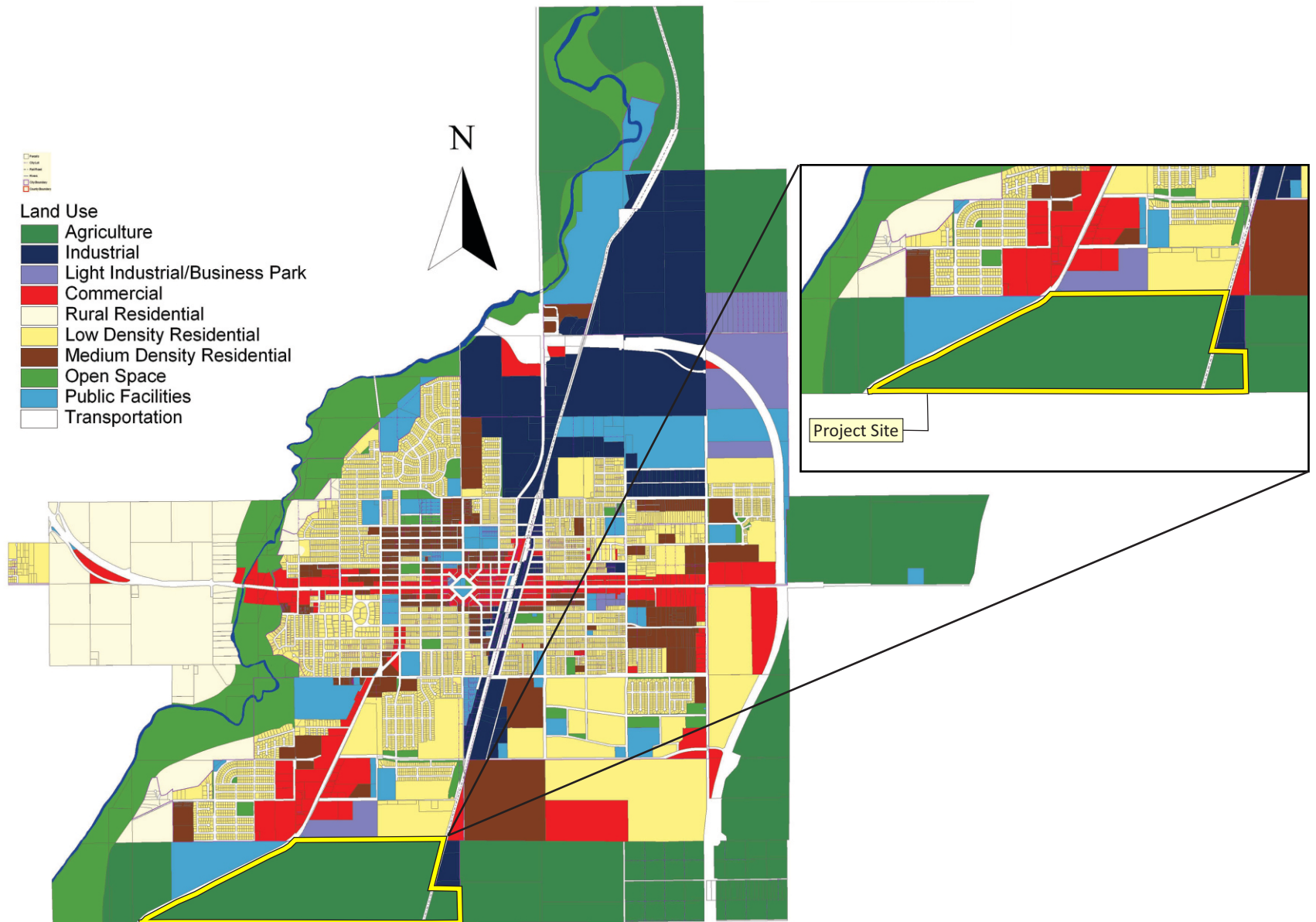
---

<sup>1</sup> Rosenberg, S.A. 2006. A Phase I Archaeological Survey for the Rancho Los Lagos Project, City of Brawley, Imperial County, California, TPM 0400. September.

<sup>2</sup> City of Brawley. 2012. City of Brawley Land Use Map. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Brawley\\_Land\\_Use\\_June\\_2014\\_Update.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Brawley_Land_Use_June_2014_Update.pdf). Accessed December 20, 2023.

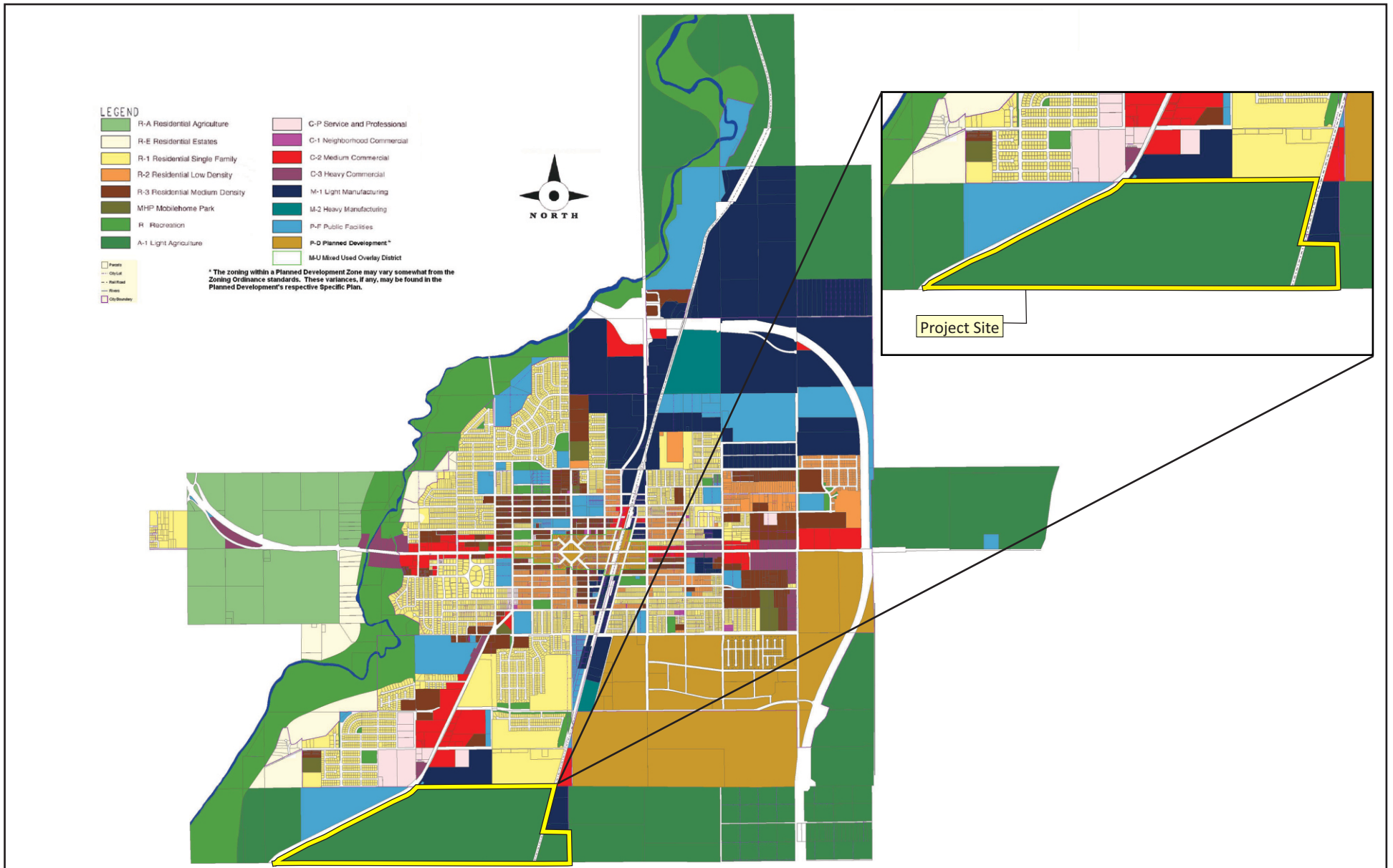
<sup>3</sup> City of Brawley. 2020. City of Brawley Zoning Map. Website: <https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Brawley%20Zoning%20with%20SP's%20-%20December%202020%20Update.pdf>. Accessed December 20, 2023.





Source: City of Brawley, 07/2012.

THIS PAGE INTENTIONALLY LEFT BLANK



Source: City of Brawley, 06/2017.

**FIRSTCARBON**  
SOLUTIONS™

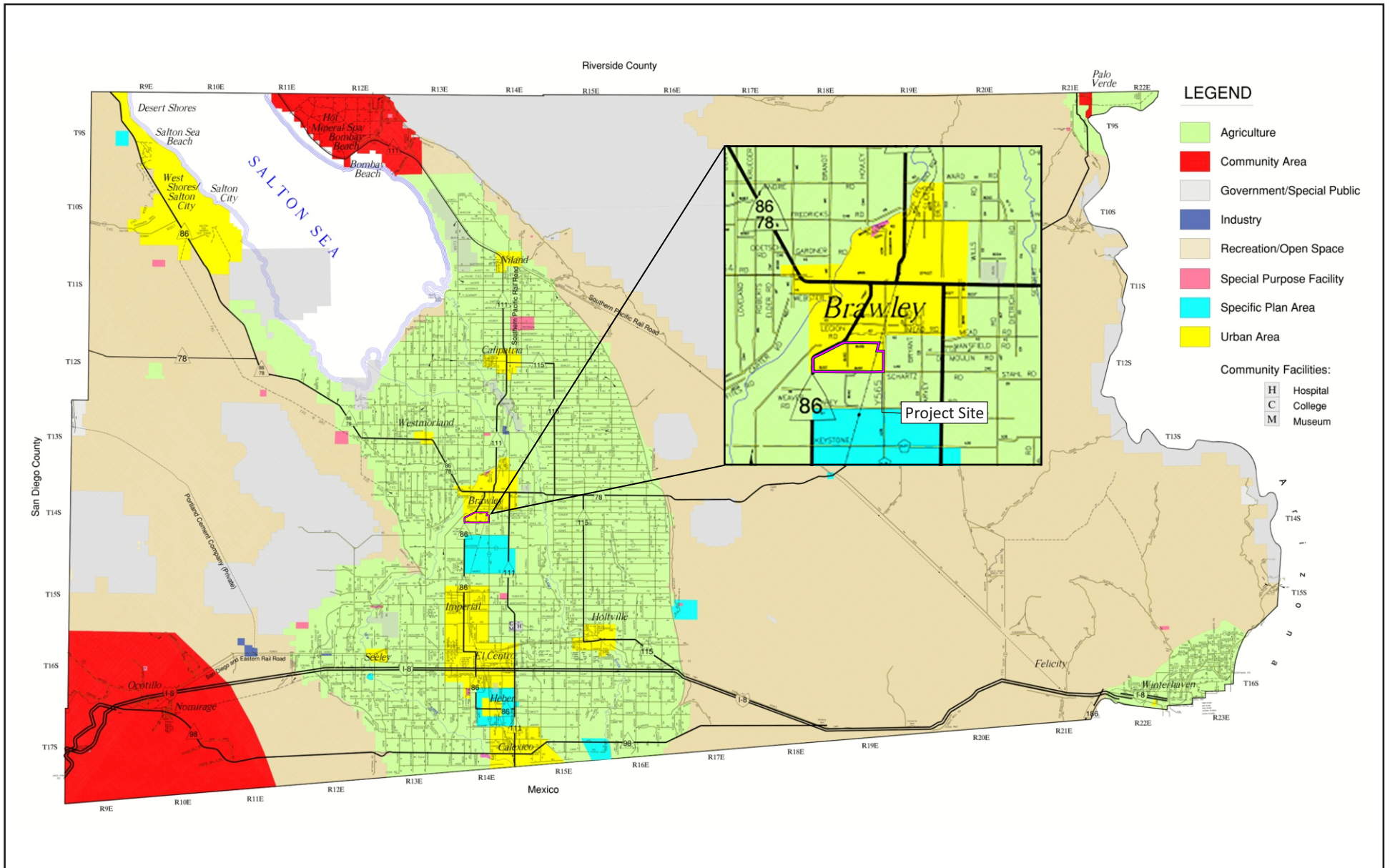
49500002 • 11/2022 | 4\_city\_brawley\_zoning.cdr

## Exhibit 4 City of Brawley Zoning

CITY OF BRAWLEY  
RANCHO LOS LAGOS SPECIFIC PLAN PROJECT  
INITIAL STUDY

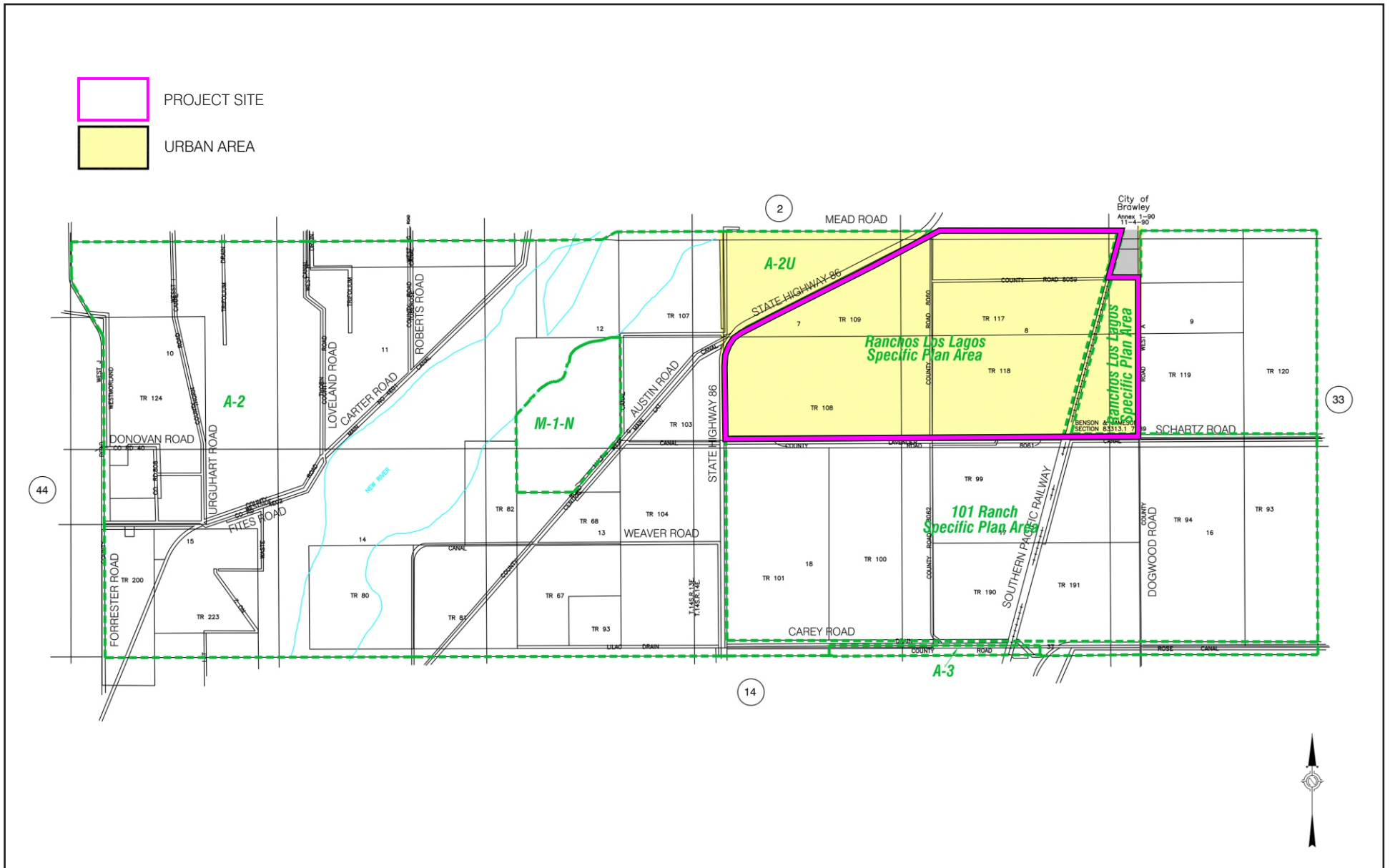
THIS PAGE INTENTIONALLY LEFT BLANK





Source: Imperial County California, 03/01/2007.

THIS PAGE INTENTIONALLY LEFT BLANK



Source: Imperial County Planning/Building Department, 10/27/2014.

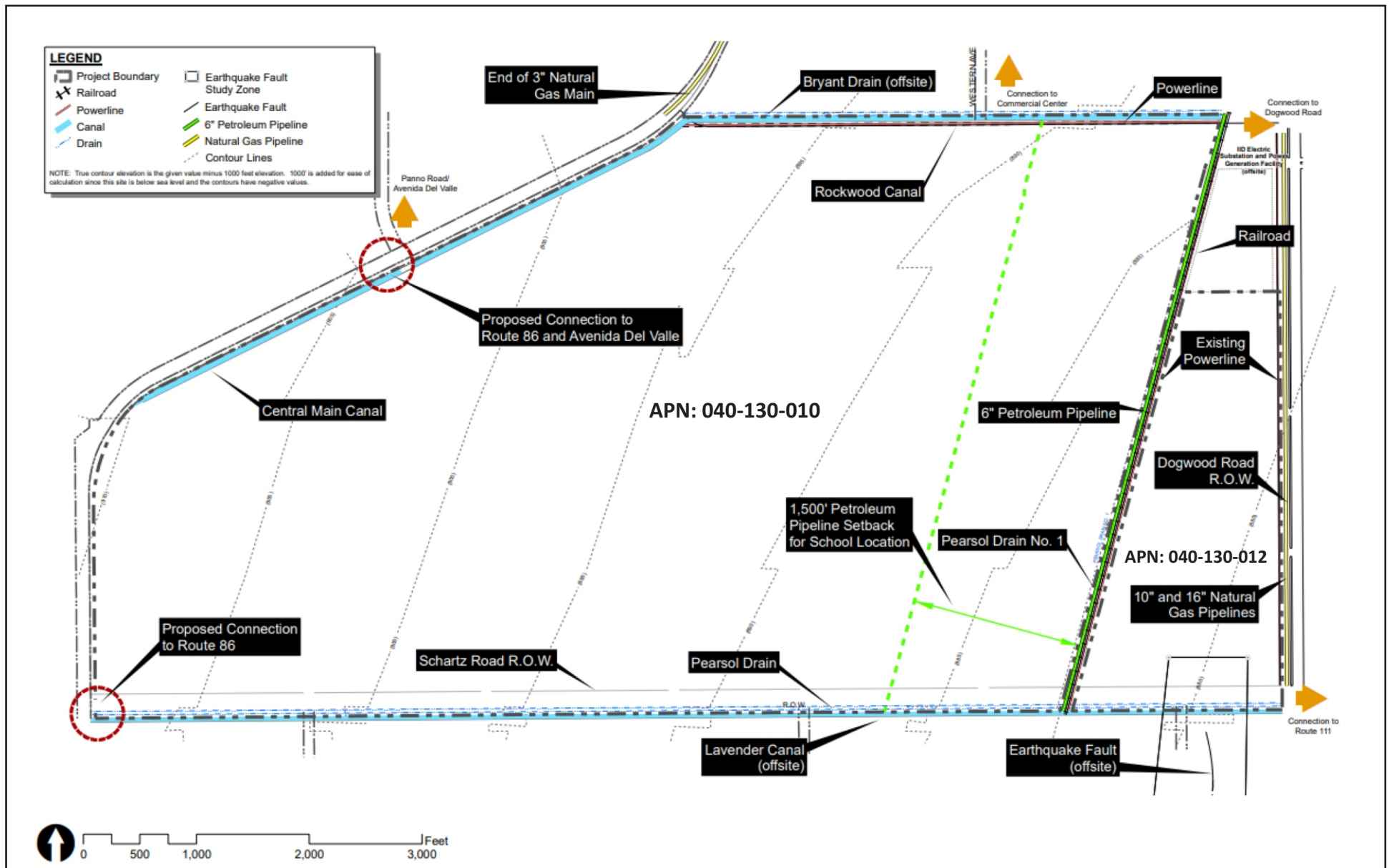
**FIRSTCARBON**  
SOLUTIONS™

49500002 • 11/2022 | 6\_imperial\_county\_zoning\_map.cdr

## Exhibit 6 Imperial County Zoning

CITY OF BRAWLEY  
RANCHO LOS LAGOS SPECIFIC PLAN PROJECT  
INITIAL STUDY

THIS PAGE INTENTIONALLY LEFT BLANK



Source: P&D Consultants in conjunction with EDAW, 2006; State of California, 1990.

THIS PAGE INTENTIONALLY LEFT BLANK



## 1.4 - Project Description

### 1.4.1 - Project History

The Imperial County Board of Supervisors certified the Certified EIR in 2009. In June 2012, the Imperial County Board of Supervisors approved the Rancho Los Lagos Specific Plan, Final EIR, Findings of Fact, MMRP, General Plan Amendment, Vesting Tentative Tract Map 974, a Rezone Ordinance, and Development Agreement. The 2012 Rancho Los Lagos Specific Plan sought to establish a framework for development of the project site as a pedestrian-oriented residential community with parks, schools, and other amenities within a short walk of most homes. The plan's four main components included the conventional residential area, active adult residential area, the golf course, and the business park/Industrial Area. Table 1 lists the project components that were proposed in the Certified EIR.

**Table 1: Land Use Summary from the Certified EIR**

Land Use	Approximate Gross Acres	% of Total Area	Dwelling Units
<b>Single-family Residential<sup>1</sup></b>			
Low Density Single-family <sup>2</sup>	191	17.7	884
Medium Density Single-family <sup>3</sup>	132	12.3	991
<b>Single-family Detached Subtotal</b>	<b>323</b>	<b>30.0</b>	<b>1,875</b>
<b>Multi-family Residential<sup>4</sup></b>			
High Density Multi-family <sup>5</sup> (12-24 du/ac)	63	5.9	1,016
<b>Multi-family Residential Subtotal</b>	<b>63</b>	<b>5.9</b>	<b>1,016</b>
<b>Active Adult (or Conventional) Gated Community Residential</b>			
Low Density Single-family	77	7.2	429
Medium Density Single-family	77	7.1	510
<b>Active Adult (or Conventional) Gated Community Subtotal</b>	<b>154</b>	<b>14.3</b>	<b>939</b>
<b>RESIDENTIAL SUBTOTAL</b>	<b>540</b>	<b>50.2</b>	<b>3,830</b>
<b>Nonresidential Uses</b>			
Business Park	97	9.0	—
Infrastructure Streets and IID Easements	85	7.9	—
Commercial Mixed-Use (including potential Fire Station Site)	9	0.8	—
Commercial	3	0.3	—
Specialty Commercial at Community Park	(3 ac included in Community Park acreage)		
Elementary Schools	24	2.2	—
<b>Nonresidential Uses Subtotal</b>	<b>218</b>	<b>20.2</b>	<b>—</b>

Land Use	Approximate Gross Acres	% of Total Area	Dwelling Units
<b>Open Space/Recreation</b>			
Parks (including lakes)	71	6.6	—
Open Space/Buffers	96	8.9	—
Executive Golf Course (including lakes)	139	12.9	—
Active Adult (or Conventional) Gated Community HOA Recreation Complex	12	1.1	—
<b>Open Space/Recreation Subtotal</b>	<b>318</b>	<b>29.5</b>	<b>—</b>
<b>GRAND TOTAL</b>	<b>1,076</b>	<b>99.9</b>	<b>3,830</b>
Notes: <sup>1</sup> Single-family Residential dwelling units refers to single-family detached as well as duplexes. Duplexes are two attached single-family dwelling units that share a common wall. <sup>2</sup> Low Density Single-Family refers to detached single-family dwelling units on lots 5,000 square feet and larger. <sup>3</sup> Medium Density Single-family refers to both detached single-family dwelling units on lots ranging in size from 3,500 to 4,999 square feet; and, attached duplex dwelling units on lots ranging in size from 3,500 to 4,999 square feet. (One unit per lot). <sup>4</sup> Multi-family Residential refers to both attached (3 to 6 attached dwelling units sharing a common wall) and multi-family (multiple units stacked vertically) dwelling units. <sup>5</sup> High Density Multi-family refers to both attached and multi-family dwelling units in the range of 12-24 dwelling units per acre. <sup>6</sup> Medium Density Attached refers to attached dwelling units configured on the site at a density of 8-12 dwelling units per acre.			

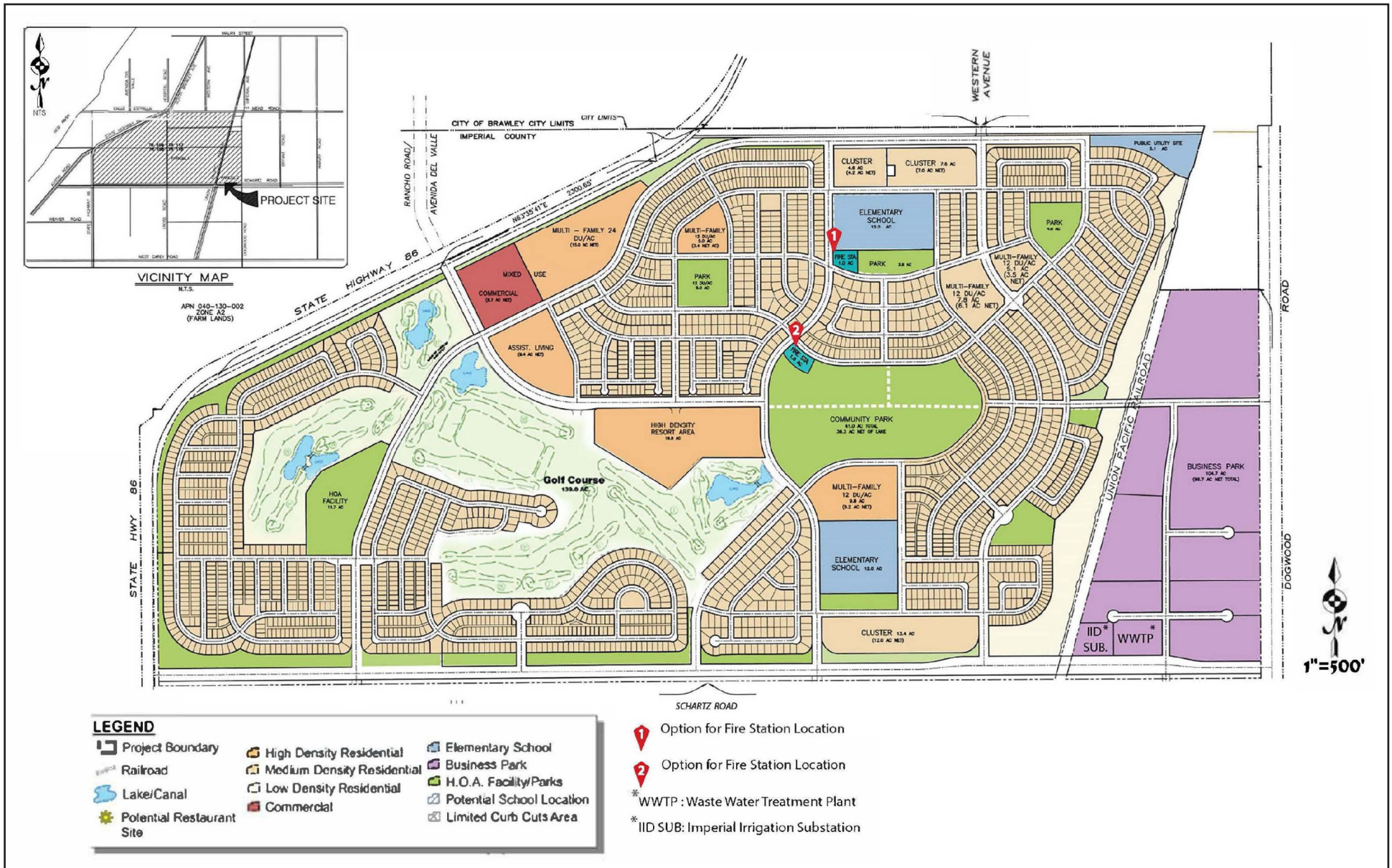
Since County approval of the Rancho Los Lagos Specific Plan, Vesting Tentative Tract Map 974, Rezone Ordinance, and the Development Agreement in 2012, the project has not moved forward. The City of Brawley proposes to annex the project site and expand infrastructure in support of the development of the Rancho Los Lagos Specific Plan.

### 1.4.2 - Annexation to the City of Brawley

As part of the proposed project, the entire project site would be annexed to the City. As previously discussed, and as shown in Exhibit 7, the project site consists of two parcels: APN 040-130-010 is approximately 961 acres and is located west of the UPRR right-of-way, and APN 040-130-012 is approximately 115 acres and is located east of the UPRR right-of-way. As part of the project, both parcels would be annexed to the City and rezoned to Specific Plan by the City upon approval.

### 1.4.3 - Proposed Project

The proposed project is designed to be a pedestrian-oriented residential community. In addition to residential areas, the proposed project would also include a golf course, several public parks, commercial and retail development, a site to be developed as a fire station, two school sites, and the Industrial Business Park. A resort hotel and spa are also planned (Exhibit 8). A summary of the project components is provided in Table 2.



Source: Dubose Design Group.

THIS PAGE INTENTIONALLY LEFT BLANK

**Table 2: Proposed Land Use Summary**

Land Use	Approximate Gross Acres	Percent of Total Area (%)	Dwelling Units	Phase 1 Units	Phase 2 Units
<b>Single-family Residential</b>					
Low Density Single-family	182	16.9%	837	337	500
Medium Density Single-family	132	12.3%	991	243	748
<b>Single-family Subtotal</b>	<b>314</b>	<b>29.2%</b>	<b>1,828</b>	<b>580</b>	<b>1,248</b>
<b>Multi-family Residential</b>					
High Density Multi-family (12-24 du/ac)	43	4.0%	894	115	779
Resort Hotel and Spa (381 rooms) <sup>4</sup>	20	—	—	—	—
High Density Assisted Living (12-24 du/ac)	9	0.9%	169	—	169
<b>Multi-family Subtotal</b>	<b>72</b>	<b>6.7%</b>	<b>1,063</b>	<b>115</b>	<b>948</b>
<b>Active Adult (or Conventional) Gated Community Residential</b>					
Low Density Single-family	77	7.2%	429	—	429
Medium Density Single-family	77	7.2%	510	—	510
<b>Gated Community Subtotal</b>	<b>154</b>	<b>14.3%</b>	<b>939</b>	<b>—</b>	<b>939</b>
<b>RESIDENTIAL SUBTOTAL</b>	<b>540</b>	<b>50.2%</b>	<b>3,830</b>	<b>695</b>	<b>3,135</b>
<b>Nonresidential Uses</b>					
Industrial Business Park—M1	67	6.2%	—	25	42
Industrial Business Park—M2	30	2.8%	—	0	30
Infrastructure Streets and IID Easements	82	7.7%	—	22	61
Public Utility Yards	6	0.6%	—	6	0
Commercial Mixed-Use	9	0.8%	—	0	9
Specialty Commercial at Community Park	(3-acres included in Community Park acreage)			0	0
Elementary	24	2.2%	—	12	12
<b>NONRESIDENTIAL USES SUBTOTAL</b>	<b>219</b>	<b>20.3%</b>	<b>—</b>	<b>65</b>	<b>154</b>
<b>Open Space/Recreation</b>					
Parks (including lakes)	70	6.5%	—	17.5	52.5
Open Space/Buffers	96	8.9%	—	18	78
Executive Golf Course (including lakes)	139	12.9%	—	0	139
Active Adult (or Conventional) Gated Community HOA Recreation Complex	12	1.1%	—	0	12

<sup>4</sup> An alternative to the resort hotel and spa would be High Density Multi-family housing.

Land Use	Approximate Gross Acres	Percent of Total Area (%)	Dwelling Units	Phase 1 Units	Phase 2 Units
<b>OPEN SPACE/RECREATION SUBTOTAL</b>	<b>317</b>	<b>29.6%</b>	<b>—</b>	<b>36</b>	<b>281</b>
<b>GRAND TOTAL</b>	<b>1,076</b>	<b>100%</b>	<b>3,830</b>	<b>716</b>	<b>3,649</b>
Notes: HOA = Homeowner's Association					

As shown in Table 3 below, the proposed project would alter the land uses that were approved by the County in 2012. Table 3 below provides a comparison of the Certified EIR to the proposed project.

**Table 3: Comparison of the Certified EIR to the Proposed Project**

Specific Plan	Certified EIR (acres)	Proposed Project (acres)	Net Change (acres)
<b>Single-family Residential</b>			
Low Density Single-family	191	182	-9
Medium Density Single-family	132	132	0
<b>Single-family Subtotal</b>	<b>323</b>	<b>314</b>	<b>-9</b>
<b>Multi-family Residential</b>			
High Density Multi-family (12-24 du/ac)	63	43	-20
Resort Hotel and Spa (381 rooms) <sup>5</sup>	—	20	+20
High Density Assisted Living (12-24 du/ac)	—	9	+9
<b>Multi-family Subtotal</b>	<b>63</b>	<b>72</b>	<b>+9</b>
<b>Active Adult (or Conventional) Gated Community Residential</b>			
Low Density Single-family	77	77	0
Medium Density Single-family	77	77	0
<b>Gated Community Subtotal</b>	<b>154</b>	<b>154</b>	<b>0</b>
<b>RESIDENTIAL SUBTOTAL</b>	<b>540</b>	<b>540</b>	<b>0</b>
<b>Nonresidential Uses</b>			
Industrial Business Park—M1	97	67	-30
Industrial Business Park—M2	—	30	+30
Infrastructure Streets and IID Easements	85	82	-3
Public Utility Yard (including Fire Station Site)	—	6	+6
Commercial Mixed-Use	9	9	0

<sup>5</sup> An alternative to the resort hotel and spa would be High Density Multi-family housing.



Specific Plan	Certified EIR (acres)	Proposed Project (acres)	Net Change (acres)
Specialty Commercial at Community Park	3	3	0
Elementary Schools	–	24	+24
<b>NONRESIDENTIAL USES SUBTOTAL</b>	<b>218</b>	<b>219</b>	<b>+1</b>
<b>Open Space/Recreation</b>			
Parks (including lakes and potential Fire Station Site)	71	70	-1
Open Space/Buffers	96	96	0
Executive Golf Course (including lakes)	139	139	0
Active Adult (or Conventional) Gated Community HOA Recreation Complex	12	12	0
<b>OPEN SPACE/RECREATION SUBTOTAL</b>	<b>318</b>	<b>318</b>	<b>0</b>
<b>GRAND TOTAL</b>	<b>1,076</b>	<b>1,076</b>	<b>0</b>
Notes: HOA = Homeowner's Association			

As shown in Table 3 above, compared to the Certified EIR, the proposed project would reduce Low Density Single-family housing by 9 acres and High Density Multi-family land uses by 20 acres. The proposed project would also increase High Density Assisted Living land uses by 9 acres. Additionally, the proposed project would add land uses for elementary schools and a fire station, as well as a resort hotel and spa. The total amount of land used for nonresidential uses would increase by 1 acre. The total number of dwelling units (3,830) and total number of acres used for residential land uses (540 acres) would remain unchanged. However, the total number of single-family residential units would be reduced by 47 units, and the total number of multi-family residential units would increase by 47 units.

## Residential Use

The Specific Plan establishes a total allowable maximum of 3,830 dwelling units on approximately 540 acres, and would result in the development of several housing types including single-family, multi-family, active adult (conventional) gated community living units (Exhibit 8). The Specific Plan shows the residential areas clustered around neighborhood parks, a golf course, and elementary schools. The residential component of the Specific Plan consists of a total of 1,828 single-family dwelling units; 1,063 multi-family dwelling units, which include 169 assisted living units; and 939 gated active adult dwelling units on a variety of lot sizes.

### **Active Adult (Conventional) Gated Community Residential Area**

The active adult (conventional) gated community residential areas of the Specific Plan provide single-family detached housing. The conventional residential areas also include commercial/multi-family mixed-use areas allowing neighborhood serving retail uses as well as apartments. Pedestrian connections would link commercial and residential land uses. Vertical mixed-use development such

as offices or residential apartments above ground floor retail uses would also be developed. This portion of the Specific Plan also provides a fire station site as well as an option for a religious use site that would serve the Specific Plan residents and surrounding community.

The proposed Active Adult Residential community consists of 939 active adult single-family residential dwelling units on medium and low density lots, ranging between 3,500 and 5,000 square feet. The active adult single-family homes and assisted living area in the Specific Plan shows the community located in the southwest corner of the site, and it would be developed around the golf course, separating this area from other more conventional, non-age-restricted areas of the project. The Active Adult Gated Community Residential Area also includes a variety of public parks and Homeowner's Association (HOA) facility.

#### *Homeowner's Association Facility*

An approximately 12-acre gated community HOA recreation complex has been set aside within the Active Adult Community portion of the Specific Plan. This area would include amenities often associated with age-restricted communities such as a club house, recreational facilities, and other facilities. The ultimate mix of amenities on this site would be at the discretion of the developer, but its use would be restricted to this community and would not be available to other residents of Rancho Los Lagos.

## **Nonresidential Uses**

### ***Commercial Mixed-Use***

Commercial and Mixed-Use land uses are located within the northwest and northeast portions of the Specific Plan. An approximately 9-acre commercial mixed-use area would be located in the northwest portion of the Plan Area, providing employment, retail, and entertainment opportunities for those living within the community and the surrounding multi-family and assisted living housing. Additionally, an approximately 2.5-acre commercial area would be located in the northeast corner of the project site.

### ***Industrial Business Park***

An Industrial Business Park element totaling approximately 119.90 acres would be located east of the UPRR right-of-way, providing employment opportunities to residents in the surrounding area (Exhibit 8). Approximately 8 acres within the Business Park would be allocated for infrastructure and streets. The Industrial Business Park would contain an electric substation and IID wastewater treatment/reclamation plant. The IID substation would serve the project site, and additional space would be allocated for water and sewer treatment, if buildout occurs ahead of the buildout of City facilities.

The Industrial Business Park would consist of 13 buildings (Buildings A through M); these buildings would be used for a mixture of industrial and business land uses, totaling 1,744,854 square feet. A summary of the Industrial Business Park buildings is provided below in Table 4.

**Table 4: Industrial Business Park Land Uses**

Building	Square Feet	Parking Required (stalls)	Parking Provided (stalls)
<b>A</b>	256,000	256	256
<b>B</b>	273,021	273	274
<b>C</b>	174,836	175	175
<b>D</b>	216,400	216	216
<b>E</b>	73,600*	294	294
<b>F</b>	73,600*	294	294
<b>G</b>	73,600*	294	294
<b>H</b>	73,600*	294	294
<b>I</b>	196,712*	787	620
<b>J</b>	73,725	295	232
<b>K</b>	79,040	79	80
<b>L</b>	89,640	90	90
<b>M</b>	91,080	91	91
<b>TOTAL</b>	<b>1,744,854</b>	<b>3,438</b>	<b>3,210</b>
Notes: * 2-story buildings			

## Schools

Two proposed elementary school sites would occupy a total of 24 acres (approximately 12 acres each). Each school site would be adjacent to a park to allow for greater use of parks and school recreation facilities by students and residents alike. The first elementary school would be located on the northern portion of the project site, along Carolyn Street, and would be developed as a public school with a maximum enrollment of 650 students. The second elementary school would be located on the southern portion of the project site, along Carolyn Street, and would be developed as a private religious school with a maximum enrollment of 650 students.

## Open Space

### ***Golf Course and Community Park***

The 139-acre, 18-hole golf course would be an executive course that includes a clubhouse and driving range. The golf course would connect to the 42-acre community park near the center of the project site. The golf course is intended to create a visual amenity, as well as a recreational opportunity for all residents of Rancho Los Lagos and the region as a whole, since it is intended to be open to the public.

**Additional Public Parks**

Additional open space and recreational areas (not including the golf course) total 179 acres, with 70 acres for parks and lakes, including a 42-acre community park with a 4.7-acre water feature, and 96 acres of open space buffer areas. A variety of neighborhood parks and mini parks would be located throughout the project site, providing residents additional recreation opportunities within easy walking distance of most homes. All the neighborhood parks and schools would be linked by a trails system, which also connects to the central community park. The open space buffer areas would be located adjacent to the external roads and irrigation canals that define the boundaries of the project site, as well as a wide buffer between the residential neighborhoods on the east side of the site, and the UPRR right-of-way.

**Other Amenities**

Other amenities proposed include a 19.8-acre resort hotel and spa that would consist of 381 rooms and a spa.

**Circulation**

Currently, there are no paved roads on the project site.

The proposed project would construct an internal roadway system to serve the project site and connect to existing roadways (Exhibit 9). The proposed circulation plan consists of major roadways, primary arterials, collector/distribution streets, and local streets. The major roadways that would serve the project site would be the existing SR-86 on the western boundary, existing Schartz Road on the southern boundary, and the existing Dogwood Road on the eastern boundary of the project site.

The primary roadways serving the project site would be Jameson Street, Benson Street, Schartz Road, Carolyn Street, and Western Avenue. Jameson Street would be the main roadway within the project site and extends from the northern boundary of the project site (intersecting with Western Avenue) to the southern boundary of the project site (intersecting with Schartz Road). Jameson Street would be a two-lane roadway that follows the northern project site boundary (along the Rockwood Canal) and extends to the western portion of the project site, where it bisects Benson Street and Schartz Road. Benson Street would connect with the existing Avenida Del Valle and would continue through the western portion of the project site until it terminates at the western boundary of the community park. Benson Street would start again from the eastern boundary of the community park until it bisects Dogwood Road on the eastern project site boundary. Carolyn Street and Western Avenue are north-south oriented streets that both traverse the project site and connect with Jameson Street at the northern boundary of the project site and Schartz Road at the southern project boundary. In addition to the main internal roads, various internal secondary arterial roadways are proposed to serve the project, including Fletcher Circle and Dockeray Street.

A total of six access points would be provided along Schartz Road south of the project site; access points to Schartz Road would be provided at Jameson Street, Carolyn Street, Western Avenue, and Dockeray Street. An additional access point would be provided from existing Avenida Del Valle/Benson Street at the northwest portion of the project site. Carolyn Street, Western Avenue, and Fletcher Circle would provide access to the northern portion of the project site.



Source: Dubose Design Group.

THIS PAGE INTENTIONALLY LEFT BLANK



The circulation plan includes one grade-separated over-crossing over UPRR at Schartz Road and two bridges are proposed as a part of the proposed project.

### ***Bike Paths***

#### ***Class 1***

Class 1 bike paths provide a completely separate right-of-way designated for the exclusive use of bicycles and pedestrians with cross-flows by motorists minimized. The proposed project would construct an 8-foot Class I bike path along the railroad right-of-way through the detention basin from the Regional Paseo provided along Schartz Road to the Regional Paseo along Jameson Street (Exhibit 10). This bike path will also provide maintenance vehicles with access to the detention basin.

#### ***Class 2***

Class 2 bike lanes are lanes on the outside edge of roadways reserved for the exclusive use of bicycles and designated with special signing and pavement markings. Class 2 bike lanes are provided on street segments anticipated to carry high vehicular traffic volumes, including Jameson Street and Benson Road, to enhance bicycle safety (Exhibit 10).

#### ***Class 3***

Class 3 bike routes are roadways recommended for bicycle use and often connect to bike lanes and bike paths. Routes are designated with signs only and may or may not include additional pavement width. Class 3 bike routes are provided on roadways on which relatively low vehicular traffic volumes are anticipated and design speeds are low. Class 3 bike routes are proposed on Community Park Street and on selected streets that lead to the community park or through the community (Exhibit 10). These bike routes are designated with signage only and bicyclists share the roadway with other vehicles.

THIS PAGE INTENTIONALLY LEFT BLANK



Source: P&D Consultants in conjunction with EDAA; 2007; 2008.

THIS PAGE INTENTIONALLY LEFT BLANK

## Utilities

### **Water**

The City of Brawley will provide potable water treatment and distribution to the proposed project site. Currently, the City of Brawley purchases raw imported Colorado River water from IID, which delivers water via IID-owned and operated canals. Untreated water is used for agricultural purposes, while water intended for domestic, industrial, and commercial purposes is transported to the City's water treatment plant. The potable water is distributed through the existing City-owned and operated water distribution system which will be connected to the project site by an extension of pipes.

The City's existing water storage facilities and pump stations will be utilized to store and distribute water to the proposed project site. With implementation of the proposed project, water will be provided by the City. Two Water Treatment Plants (WTPs) would be developed, located in the northern and southern portions of the planning area. The applicant would be responsible for design and construction of the proposed WTPs, and the City would be responsible for maintenance and operation of these facilities.

Potable water would be distributed throughout the proposed project area via a looping network of 16-inch, 8-inch, and 1-inch water lines provided within the internal street right-of-way. The exact number and location of water utility improvements would be determined when the final site, grading, and utility plans are prepared by the project engineer, subject to review and approval by the City of Brawley Engineer, City of Brawley Public Works Director, Imperial County, and the IID.

Reclaimed water would be used for the proposed project's golf course, community park, right-of-way landscaping, and other certain open space areas from a Wastewater Treatment Plant (WWTP) that would be located either on-site or in the general vicinity. If located off-site, reclaimed water would be provided through a system of off-site and on-site reclaimed water lines located within roadway right-of-way.

As a part of the proposed project, an 8-inch water main would serve the site with 1-inch water service for each lot. The City will require installation of water meters on all new construction and development to aid with water conservation. Developers will be responsible for connecting to the water distribution system and designing infrastructure in conformity with relevant federal, State, and local regulations.

### **Wastewater and Solid Waste**

Options exist for provision of wastewater treatment. As an example, the City may require design and construction of a small sewage treatment package plant to expand wastewater services to the project site. It would be located in the northeastern portion of the project site and would be constructed during or prior to the first phase of the proposed project. The system would be designed based on the specifications and performance standards required by the City and may be scaled up to expand capacity in preparation for the development of residential, commercial, and industrial land uses. The package plant described might also be taken out of use once the permanent WWTP near the southeast corner of the site in the Industrial Business Park is available. Developers would be

responsible for connecting to the wastewater transport system and designing it in conformity with relevant federal, State, and local regulations.

Upon determination of the WWTP design specifications, the City would analyze existing and projected wastewater needs to ensure compliance with discharge requirements of the Regional Water Quality Control Board (RWQCB). Following the City's assessment and approval of the design of the wastewater treatment system, the WWTP will be annexed into the City's jurisdiction.

### **Electricity**

The proposed project includes an IID electrical substation east of the railroad in the Industrial Business Park area of the plan. The substation would provide power for the entire project site. Service lines must be extended to each residence and business. According to the County Development Code, transmission lines to residences and businesses will be installed underground within roadway right-of-way.

### **Natural Gas**

Two natural gas lines run along Dogwood Road. These pipes parallel the Dogwood Road centerline and are separated from each other by approximately 16 feet. These pipes provide the closest gas conduits to the project site. An additional underground petroleum pipeline runs parallel to the Southern Pacific Railroad, approximately 50 feet west of the tracks.

### **Landscaping**

Neighborhood parks would be landscaped with a variety of desert-appropriate plants and trees. Areas within roadway medians and the right-of-way to walkways would be landscaped. Landscaping within roadways would consist of drought-tolerant groundcover and tree species requiring minimal irrigation, fertilization, and maintenance. Additionally, public spaces and selected streets would be landscaped with oasis-landscaping. All landscaping will be installed in conformance with the Imperial County Agriculture Commissioner's approved plant palette and City water conservation ordinance.

### **Community Walls Program**

Community walls are provided in strategic locations within the project site to provide visual screening, and attenuate noise impacts. Walls are also used to provide aesthetically consistent screening between private and public spaces in some areas.

## **1.4.4 - Project Phasing**

The proposed project is comprised of four related but independent components: the conventional residential area including related school, park, commercial, and mixed-use elements; the gated active adult residential area (which may be developed as conventional residential depending on market conditions); the golf course; and the business park/industrial area. The development timing of each component will be determined by market conditions and is somewhat independent of the other components. The Rancho Los Lagos Specific Plan consists of two main phases of construction. Phases 1 and 2 sequence and details are provided in Table 2 above.



## Phase 1

Phase 1 would develop the northeastern portion of the project site and the business park. This phase would be developed over 8 years and is further broken down into Planning Areas. The conventional residential area of the Phase 1 buildout would consist of 580 single-family dwelling units, 115 multi-family dwelling units, a community park totaling 17.5 acres, and 12 acres for public elementary schools. Other Commercial and Mixed-Use portions of the Phase 1 development include a 5-acre utility yard, a 25-acre Industrial Business Park (M1), and a 5.1-acre IID substation.

## Phase 2

Phase 2 would develop the remaining development of the Specific Plan. This phase would be developed over 22 years and is further broken down by Planning Areas. The conventional residential area of the Phase 2 buildout would consist of 1,248 single-family dwelling units, 948 multi-family dwelling units, 169 assisted living dwelling units, 939 active adult dwelling units, several public parks totaling 54 acres, including a 41-acre community park, and a 12-acre HOA facility. Other Commercial and Mixed-Use portions of the Phase 2 development include a 9-acre commercial area, a 381-room resort hotel and spa, and a 12-acre private elementary school site. The 18-hole executive public golf course, including lakes, would be developed on 139 acres.

## 1.5 - Intended Uses of this Document

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063(c)(3), to assist the Lead Agency in EIR preparation by focusing the EIR on the project's significant environmental impacts, identifying impacts determined not to be significant, and explaining why potentially significant impacts were determined not to be significant.

This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Initial Study will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Initial Study should be sent to:

City of Brawley  
Jimmy Duran, City Manager  
383 Main Street  
Brawley, CA 92227  
Phone: 760. 344.2222  
Email: jduran@brawley-ca.gov

### 1.5.1 - Discretionary and Ministerial Actions

Discretionary approvals and permits are required by the City for implementation of the proposed project. The proposed project would require the following discretionary approvals and actions, including:

- Annexation to the City of Brawley
- General Plan Amendment Approval

- Specific Plan Approval
- Rezone Permit
- Tentative Use Permit—Golf Course
- Development Agreement

Subsequent ministerial actions would be required for the implementation of the proposed project including issuance of grading and building permits.

### 1.5.2 - Responsible and Trustee Agencies

A number of other agencies in addition to the City of Brawley will serve as Responsible and Trustee Agencies, pursuant to CEQA Guidelines Section 15381 and Section 15386, respectively. These agencies may include, but are not limited to, the following:

- Imperial County Local Agency Formation Commission (LAFCo)
- California Department of Fish and Wildlife (CDFW)
- California Department of Transportation (Caltrans)
- California State Water Resources Control Board (State Water Board)
- California Public Utilities Commission (CPUC)

Actions that are necessary to implement the proposed project that must be taken by other agencies include:

- Annexation to the City of Brawley
- Clean Water Act Section 404 Permit
- Streambed Alteration Agreement
- Right-of-Way Encroachment Permit
- General Storm Water Permit for Construction and Storm Water Pollution Prevention Plan (SWPPP)

## SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected			
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.			
<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources
<input type="checkbox"/>	Geology/Soils	<input checked="" type="checkbox"/>	Greenhouse Gas Emissions
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning
<input checked="" type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing
<input type="checkbox"/>	Recreation	<input checked="" type="checkbox"/>	Transportation
<input checked="" type="checkbox"/>	Utilities/Services Systems	<input type="checkbox"/>	Wildfire
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	Energy
<input type="checkbox"/>		<input type="checkbox"/>	Hazards/Hazardous Materials
<input type="checkbox"/>		<input type="checkbox"/>	Mineral Resources
<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	Public Services
<input type="checkbox"/>		<input type="checkbox"/>	Tribal Cultural Resources
<input checked="" type="checkbox"/>		<input type="checkbox"/>	Mandatory Findings of Significance
Environmental Determination			

On the basis of this initial evaluation:

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

Date: 12/6/2024

Signed by: Cynthia Mancha  
3018941D4CE443E

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.1 Aesthetics</b> <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

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

### Summary of Certified EIR

The Certified EIR concluded that there would be a less than significant impact to scenic vistas. Scenic vistas in the project area include the mountains surrounding the Imperial Valley and the vast, wide open spaces used for agriculture; however, the vistas are somewhat compromised by haze that is often present in the atmosphere. Structures would adhere to height restriction requirements of the established building codes so they do not block views of vistas. The Specific Plan also incorporates many open space elements and includes design features to make the development aesthetically pleasing. There are no other recognized scenic vistas in the area; therefore, scenic vistas would not be affected by the proposed project and less than significant impacts would occur.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** The General Plan does not designate any specific scenic vistas.

According to the Certified EIR, scenic vistas from this part of the valley floor include mountains to the east and west, and the vast, wide open spaces used for agriculture. These views are somewhat diminished by air pollution that is often present in the atmosphere.

The project site does not contain unique visual characteristics, nor does it contain scenic vistas or natural features (Exhibit 2). Therefore, the proposed project would have no impact on scenic vistas on the project site.

The proposed project would include residential areas, public parks, commercial and retail development, a fire station, schools, and the Industrial Business Park. The size and mass of these structures would not be great enough to obstruct any views of scenic vistas and would adhere to City requirements. Additionally, the City of Brawley would review all applications for development and recommend any necessary revisions to avoid potential impacts to scenic vistas.<sup>6</sup> Therefore, the proposed project would not have a substantial adverse effect on views of a scenic vista as defined in the General Plan and consistent with the analysis in the Certified EIR. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?**

**Summary of Certified EIR**

The Certified EIR concluded that there are no scenic highways located in the project vicinity. Additionally, the Certified EIR concluded that there are no City, County, State, or federal agency-designated scenic resources, unique physical features, or designated historic structures on the project site. Therefore, the Certified EIR determined that there are no significant impacts to these resources.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**No impact.** According to the Caltrans State Scenic Highways Map, there are no designated scenic highways near the City of Brawley. The closest designated Scenic Highway is a portion of SR-78 that traverses Anza Borrego State Park, approximately 40 miles to the northwest of the project site. A segment of SR-78 that is “eligible” for designation is located approximately 24 miles to the northwest. Neither of these highways are visible from the project site.<sup>7</sup> Additionally, the project site does not contain any trees, scenic vegetation, rock outcroppings, or historic buildings. Accordingly, project implementation would have no impact related to scenic resources within a State Scenic Highway.

Therefore, the proposed project would not have a substantial adverse effect on scenic resources. The proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

<sup>6</sup> City of Brawley. 2008. City of Brawley General Plan—Unique Topographic Features. September. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 7, 2022.

<sup>7</sup> California Department of Transportation (Caltrans). 2019. List of Eligible and Officially Designated State Scenic Highways (XLSX). Website: [https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019\\_a11y.xlsx](https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx). Accessed May 20, 2024.

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

### Summary of Certified EIR

The Certified EIR determined that the project would substantially alter the existing visual character of the site but would not degrade the existing visual character or quality of the site or its surroundings. The project would change the visual character of the site by adding structures and landscaping items; however, the design will incorporate approved building materials and appropriate quality to blend with the characteristics of the adjacent urban community. Therefore, with incorporation of the Specific Plan's design standards and architectural guidelines, the visual character or quality of the site would not be degraded. Mitigation measures included maintenance of grounds. The Certified EIR concluded that impacts would be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** The project site is in a non-urbanized area and is generally a flat, broad sweep of irrigated farmland typical of the Imperial Valley. Therefore, a potential impact would be significant if the proposed project would substantially degrade the existing visual character or quality of public views and its surroundings. The proposed project site has no distinguishing natural features, although the manufactured canals bordering the site include portions of the historic IID canal system. Several unpaved roads traverse the site. The project site is partially developed with roadways and IID canals. The project site, however, is zoned as the Rancho Los Lagos Plan Area and is adjacent to the City. Surrounding land uses are predominantly characterized by irrigated agricultural fields in active cultivation to the south and east; commercial developments approximately 0.38 mile to the north; and additional commercial and residential developments approximately 0.17 mile west of the project site (Exhibit 3). Development of the proposed project would be compatible with the surrounding land uses.

Travelers along nearby roadways, as well as the nearby residences adjacent to the project site, would have views of the project site and its surroundings. However, it is important to distinguish between public and private views. Private views are views seen from privately owned land including views from private residences and commercial developments. Public views are views that are experienced by the collective public. CEQA (Public Resources Code Section 21000 *et seq.*) case law has established that only public views, not private views, are protected under CEQA. For example, in *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720 [3 Cal. Rptr.2d 488] the court determined that, “we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general.” Therefore, this analysis focuses on potential impacts to public views, rather than private views. According to the General Plan, public views include views of natural features such as the New River corridor as well as views of the surrounding landscape and distant mountains, especially from major circulation roadways.<sup>8</sup> In the

<sup>8</sup> City of Brawley. 2008. City of Brawley General Plan—Open Space/Recreation Element. September. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 8, 2022.



case of the project site, existing public views consist primarily of views of agricultural crops, open range, and mountains to the east and west. Views from nearby roadways include SR-86 and Dogwood Road. Under the proposed project, public views would be affected by the removal of agricultural uses and the construction of new structures and infrastructure such as walkways, roadways, landscaping, parks and other amenities.

As evaluated in the Certified EIR, the proposed project would substantially alter the existing visual character of the project site, as well as public views of agriculture and open range, and would increase the intensity of on-site activities. The proposed project would include residential areas, public parks, commercial and retail development, a fire station, schools, and the Industrial Business Park. The size and mass of these structures would not be great enough to obstruct views of any mountains. Although the proposed Specific Plan would change the existing visual character of the area, the proposed project includes a cohesive design consistent with the City's design standards and would not degrade the existing visual character or quality of the site or its surroundings. Furthermore, MM A-7 and MM A-8 require the proposed project to comply with the City's design standards—including minimum setbacks, maximum building heights, and separation between buildings—and to go through design review prior to development.

The Specific Plan includes development standards and architectural guidelines for all of the proposed land uses with special attention to residential areas. The Specific Plan also includes specific Streetscape Design Criteria for the various land uses and major circulation features. Additionally, the project design would incorporate approved building materials and appropriate quality to blend with the characteristics of the adjacent City. The Specific Plan includes setback requirements, lot size, density, building height limits, parking guidelines, and landscaping. Landscaping guidelines are included in the Circulation Plan and Industrial/Mixed-Use zone and would consist of drought-tolerant, low-maintenance desert species and "oasis" species to add visual appeal. Three types of parks would provide: a 42-acre community park featuring an approximate 5-acre lake; six neighborhood parks, and approximately 17 mini parks. The Specific Plan would also include a golf course on approximately 139 acres with several smaller lakes. Furthermore, MM A-1 and MM A-2 are incorporated into this document from the Certified EIR. MM A-1 and MM A-2 would require a landscape plan and revegetation of graded slopes to reduce visual impacts. Because the City has approval authority over implementation of the proposed project, the City would assume responsibility to ensure verification and compliance with the mitigation measures. Accordingly, mitigation measures from the Certified EIR have been revised to reflect the City's role. Thus, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The proposed Specific Plan design would enable the proposed development and land uses to be visually compatible with the City's design standards and visual character. Therefore, the proposed project would not have a substantial adverse effect on public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Accordingly, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR concluded that impacts resulting from light or glare that would affect day or nighttime views would be less than significant with mitigation incorporated. There are new sources of light and glare associated with any urban development. For example, windowpanes reflect sunlight during the day, and streetlights emanate into the night sky. The development of up to 3,830 new dwelling units would introduce light and glare impacts including installation of street lights, lighting of commercial areas, lighting associated with residences, and security lighting for commercial components, public buildings and parks. The project's structures would be built according to established development guidelines set forth by the County of Imperial, and consistent with the City of Brawley Municipal Code. These development codes include lighting and building material specifications which are designed to reduce impacts of light and glare. Without proper mitigation to regulate the light and glare within the project site, impacts would remain potentially significant. The implementation of Mitigation Measure (MM) A-3 through MM A-6 would reduce the impact from light and glare to less than significant. Therefore, the impacts from light and glare would be considered less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** The project site is actively cultivated and contains IID canals and drains. There are no major sources of light or glare existing on the project site. The primary sources of nighttime light in the surrounding area are from vehicle headlights traveling along SR-86 on the western boundary of the project site and the City of Brawley to the north (Exhibit 2). The Pioneers Memorial Hospital, a Walmart Supercenter, and a few residences are located north of the project site. The proposed project would alter views of the project site from these adjacent areas. Light sources from the proposed project would potentially affect daytime and nighttime public views by introducing new sources of light and glare on the project site.

Most features included in the proposed project could create a new source of substantial light or glare which would alter nighttime views in the area by developing urban uses on a site currently used for agriculture. These features would include installation of streetlights, lighting of commercial areas, lighting associated with residences, and security lighting for commercial components, public buildings and parks. However, the incorporation and compliance with City development guidelines would ensure impacts related to light and glare are minimized. Development guidelines established by the City, such as Section 28.220 and 27.90 of the City's Municipal Code, include lighting and building material specifications that are designed to reduce potential impacts of light and glare.<sup>9</sup> The County General Plan has previously designated the project site as an area of urban overlay, and urbanization has been planned for the area. Therefore, the addition of new light sources would be consistent with the planned urban overlay. Furthermore, the mitigation measures outlined in the Certified EIR would be incorporated into the proposed project to reduce potential impacts from light

<sup>9</sup> City of Brawley. 2023. City of Brawley Municipal Code – Section 27.90. Website: [https://library.municode.com/ca/brawley/codes/code\\_of\\_ordinances?nodeId=CH27BRZOOR\\_ARTVIMAINDI\\_S27.90MAINDI](https://library.municode.com/ca/brawley/codes/code_of_ordinances?nodeId=CH27BRZOOR_ARTVIMAINDI_S27.90MAINDI). Accessed November 29, 2023.

and glare. Mitigation measures include submitting a Lighting Plan and landscape plan and prohibiting floodlights. Pursuant to the mitigation measures, field and park lighting must be controlled by timers and limited to appropriate hours. Therefore, with incorporation of the mitigation measures from the Certified EIR, the proposed project would not illuminate the project site's surroundings beyond the existing ambient lighting associated with the existing development located to the north and west of the project area. The proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

## Mitigation Measures

Because the City has approval authority over implementation of the proposed project, the City would assume responsibility to ensure verification and compliance with the mitigation measures; accordingly, mitigation measures from the Certified EIR have been revised to reflect the City's role. The following mitigation measures from the Certified EIR will be incorporated:

- MM A-1** With each Phase, the applicant shall prepare and submit a landscape plan to the City of Brawley that meets the requirements of the Municipal Code and is consistent with the Landscape Design Guidelines of the Specific Plan.
- MM A-2** Landscaping and revegetation of graded slopes shall occur as soon as feasible after grading to minimize the potential for erosion as well as to reduce the potential for visual and aesthetic impacts.
- MM A-3** The applicant shall prepare and submit a Lighting Plan to the City of Brawley that identifies the location of all lighting fixtures, the orientation of the fixtures, the types of shielding that will be used to avoid producing glare, the type of shielding that would minimize uplighting and light spill, and how the fixtures would avoid the spread of stray light across project boundaries into the rural surroundings.
- MM A-4** Through CC&R's, the developer shall incorporate a prohibition on floodlights and other ambient lighting by subsequent residents.
- MM A-5** High intensity field lighting in the parks must be controlled by timers to prevent excessive operation and limited to appropriate hours.
- MM A-6** Through the City's Development Services Department, the developer shall incorporate landscape and lighting maintenance plan.
- MM A-7** Architectural design for proposed residential, commercial and business park development within the project shall comply with development standards (i.e., setbacks, height, separation) outlined in the relevant sections of the Municipal Code and subject to Design Review prior to development.
- MM A-8:** Architectural design for proposed residential, commercial and business park development within the project shall comply with development standards (i.e., setbacks, height, separation) outlined in the Municipal Code and shall be subject to HOA Design Review prior to development.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.2 Agriculture and Forestry Resources</b> <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>				
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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

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 nonagricultural use?**

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would convert Prime Farmland/Farmland of Statewide Importance to nonagricultural use but would result in a less than significant impact. The project site contains soils associated with Farmland of Statewide Importance; is located in a region

dominated by agriculture; is currently in production of agriculture; is partially located in the Brawley SOI where the City designates land as A-1; and received a California Agricultural Land Evaluation and Site Assessment (LESA) score of 69.02. The Specific Plan would directly result in the conversion of active farmland to nonagricultural uses.

However, because the County General Plan has designated the project area as an area of urban overlay, urbanization has been planned for the area. Therefore, the project does not conflict with goals and policies of the General Plan. Additionally, although the City of Brawley has designated a portion of the project site as agricultural in its General Plan (2008), the development of the land as urban would not create isolated areas of agricultural production. Therefore, impacts were determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** According to the California Department of Conservation, approximately 90 percent of the project site is classified as Farmland of Statewide Importance, while another 9 percent of the project site is classified as Prime Farmland.<sup>10</sup> Crops grown on the project site include Bermuda grass, vegetables, alfalfa, and hay. In determining impacts to agricultural resources, a LESA model prepared by the California Department of Conservation is used to assess potential impacts on agriculture and farmland. Evaluation of project-level impacts from conversion of past and present agricultural use into future nonagricultural uses is based, in part, on the LESA guidebook and model. Additionally, for the purpose of this analysis, it is assumed that a direct impact to agricultural resources would occur if an agricultural land use designation would be revised under the proposed General Plan Update to a nonagricultural use such as an employment land use or as a residential land use that would not accommodate agricultural operations.

Based on LESA model significance thresholds, project implementation would convert agricultural resources. However, because the County General Plan has previously designated the project area as an area of urban overlay, urbanization has been planned for the area. Therefore, implementation of the proposed project would not result in an unplanned conversion of agricultural land to nonagricultural uses. Additionally, because the proposed project would be consistent with the planned urban overlay, the development of the land as urban would not create isolated areas of agricultural production.

Additionally, the proposed project would not have any indirect impacts because it phases development to allow for the continuation of agricultural operations and access to irrigation water during construction. The project site has been previously identified and designated for development, and the proposed project is consistent with previously approved planning documents; accordingly, the proposed project would not result in the conversion of any additional Farmland to nonagricultural use. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

<sup>10</sup> California Department of Conservation. California Important Farmland Finder. 2016. Website: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed November 7, 2022.

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

**Summary of Certified EIR**

The Certified EIR concluded that the Specific Plan would not conflict with existing zoning for agricultural use. Additionally, there are no parcels within the project's Zone of Influence (ZOI) (which is defined as that land near a given project that is likely to influence, and to be influenced by, the agricultural land use of the subject project site) that are considered to be under a Williamson Act Contract or other protected resource categories. Thus, the Specific Plan would result in a less than significant impact. The project site contains soils associated with Farmland of Statewide Importance; is located in a region dominated by agriculture; is currently in production of agriculture; is partially located in the Brawley SOI where the City designates land as A-1; and received a LESA score of 69.02. The Specific Plan will directly result in the conversion of active farmland to nonagricultural uses.

However, because the County General Plan has designated the project area as an area of urban overlay, urbanization has been planned for the area. Therefore, the project does not conflict with goals and policies of the County General Plan. Therefore, impacts were determined to be less than significant.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The northerly portion of the project site is designated as Agricultural in the City's 2008 General Plan Update, and is zoned A-1. Residential uses are permitted by right in the A-1 zone.

The County's General Plan Land Use Element designates the project site as an Urban Area, and it is zoned as RLL-SPA-Res (Rancho Los Lagos Specific Plan Area), which plans for the conversion of farmland.<sup>11</sup> The County General Plan has designated the project area as an area of urban overlay. Additionally, the City plans to annex the project site and develop the area under the SP zone. Therefore, the proposed project would not conflict with existing zoning.

Although the project site is predominantly agricultural, no Williamson Act Contracts currently exist or have previously existed within project site boundaries. Accordingly, there is no impact with respect to Williamson Act Contracts.

Additionally, the project site's LESA score would likely be less or similar to what was analyzed in the Certified EIR. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

<sup>11</sup> Imperial County. 2007. Imperial County Land Use Plan Map. Website: <https://www.icpds.com/assets/planning/land-use-element/landuse-map.pdf>. Accessed May 29, 2024.



- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

### Summary of Certified EIR

The Certified EIR did not identify any impacts. Although this checklist question was not specifically evaluated in the Certified EIR, the Certified EIR stated that the project site is zoned general Agriculture-Urban Area (A-2U). Therefore, the Specific Plan was found not to be in conflict with existing zoning for, or to cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The northern portion of the project site is zoned A-1, and the southern portion is zoned RLL-SPA-Res. The project site does not contain any forestland and is not zoned for forest land, timberland, or timberland production. The proposed project would not be in conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR did not identify any impacts. Although this checklist question was not specifically evaluated in the Certified EIR, the Certified EIR stated that the project site is zoned A-2U. Thus, the Specific Plan does not contain any forest land, nor would it convert forest land to non-forest use. Therefore, the project as analyzed in the Certified EIR would not result in the loss of forest land or conversion of forest land to non-forest use.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The proposed project does not contain any forest land, nor would it convert forest land to non-forest use. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?**

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would convert Prime Farmland/Farmland of Statewide Importance to nonagricultural use but would result in a less than significant impact. The project site contains soils associated with Farmland of Statewide Importance; is located in a region

dominated by agriculture; is currently in production of agriculture; is partially located in the Brawley SOI where the City designates land as A-1; and received a LESA score of 69.02. The Specific Plan will directly result in the conversion of active farmland to nonagricultural uses.

However, because the County General Plan has designated the project area as an area of urban overlay, urbanization has been planned for the area. Therefore, the project does not conflict with goals and policies of the General Plan. Additionally, although the City of Brawley has designated a portion of the project site as agricultural in its General Plan (2008), the development of the land as urban would not create isolated areas of agricultural production. Therefore, impacts were determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** As discussed above, the project site is predominantly farmland and cultivates Bermuda grass, vegetables, alfalfa, and hay. The proposed project would involve the urbanization of existing farmland by developing nonagricultural uses, consistent with planned development on the site. The project site has been designated as an area of urban overlay, and urbanization has been planned for the area. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.3 Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Construction and operational activities of the proposed project would emit criteria air pollutants. FCS will prepare the Air Quality section of the Supplemental EIR and will identify impacts and mitigation as appropriate. The supporting technical data shall be provided as an appendix to the Supplemental EIR.

### Would the project:

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

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan is not consistent with the applicable air quality plan, and therefore impacts would be less than significant with mitigation. Although there is no known guidance that correlated Air Quality Attainment Plan (AQAP) consistency with the Imperial County Air Pollution Control District (ICAPCD) regional thresholds, it is common to use the thresholds in assessing AQAP compliance. If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically been over the ambient air quality standard. It follows that if a project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact. The Certified EIR determined that long-term emissions will exceed ICAPCD regional emission thresholds for reactive organic gases (ROG) and nitrous oxides (NO<sub>x</sub>) during construction. In addition, the Certified EIR concluded that the ICAPCD regional emission thresholds will be exceeded for ROG, NO<sub>x</sub>, particulate matter less than 10 microns in diameter

(PM<sub>10</sub>), and carbon monoxide (CO) during operation. Therefore, the project is significant based on this criterion.

### **Construction**

Incorporation of MM AQ-1 through MM AQ-29 would reduce construction emissions. However, of the on-site mitigation measures, only MM AQ-21 has a known quantifiable emission reduction. MM AQ-21 reduces ROG emissions from architectural coatings by at least 10 percent. ROG emissions would remain significant after incorporation of MM AQ-21. For the remaining on-site measures, the amount of reductions would be dependent on specific construction details that were not known during the preparation of the Certified EIR. Although the exact amount of reduction is unknown, because the proposed project is expected to substantially exceed the ICAPCD's thresholds for ROG and NO<sub>x</sub>, it was assumed that the proposed project's effects will remain significant after incorporation of on-site construction mitigation measures. However, the proposed project would be subject to Rule 310 (Operational Development Fee). As such, the proposed project would be required to submit fees to offset construction emissions according to the Fee Schedule in Section D of the Rule, or submit an Alternative Remission Reduction Plan, or complete a combination of the two. As such, compliance with Rule 310 would reduce the proposed project's construction emissions through the purchase of offsets. As discussed in the thresholds section, Imperial County has determined that compliance with Rule 310 fees reduces a project's air quality construction impact to less than significant after incorporation of other feasible mitigation. Therefore, compliance with Rule 310 would reduce the project's air quality construction impact to less than significant.

### **Operation**

The proposed project would add to the County of Imperial's Vehicle Miles Traveled (VMT) and generate vehicle trips. In addition, it is assumed that the project's growth was not included in the 1991 AQAP. Therefore, the project is significant based on this criterion. The proposed project would be significant on an individual basis, and the proposed project would increase VMT. Therefore, the project would not be consistent with two of the three criteria and would create a potentially significant impact in this regard. However, the potentially significant project-specific environmental effect could be eliminated or substantially lessened to a level that is less than significant by virtue of the following mitigation measures, as identified in the Certified EIR and incorporated into the proposed project. MM AQ-30 through MM AQ-53 are designed to reduce trip generation, VMT, and on-site air pollutant generation from the proposed project. In addition, certain measures reduce the energy demand of the proposed project, thereby reducing the project's indirect emissions related to off-site energy production.

Although MM AQ-30 through MM AQ-53 are known to reduce operational emissions, not all of the measures have a known quantifiable emission reduction factor. Long-term operational emissions are expected to be significant for ROG, NO<sub>x</sub>, CO and PM<sub>10</sub> after application all mitigation measures. However, the proposed project would be subject to Rule 310 (Operational Development Fee). As such, the proposed project would be required to submit fees to offset operational emissions according to the Fee Schedule in Section D of the Rule, submit an Alternative Remission Reduction Plan, or complete a combination of the two. As such, compliance with Rule 310 would reduce the proposed project's operational emissions through the purchase of offsets. As discussed in the

thresholds section, Imperial County has determined that compliance with Rule 310 fees reduces a project's regional operational impact to less than significant after incorporation of other feasible mitigation. Therefore, compliance with Rule 310 would reduce the proposed project's regional operational impact to less than significant.

Therefore, impacts were determined to be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The project site consists of two parcels and is approximately 1,076 acres of active farmland. The northern portion of the project site is zoned A-1, and the southern portion is zoned RLL-SPA-Res. The proposed project would involve conversion of existing farmland to urban uses such as residential, commercial, industrial, and open space areas. Activities associated with project implementation could result in pollutants being released.

The project site is located in the Salton Sea Air Basin (SSAB). The SSAB includes the Imperial Valley and the Coachella Valley. The Imperial County portion of SSAB is the jurisdiction of ICAPCD. The ICAPCD is responsible for monitoring air quality as well as managing programs to achieve State and federal ambient air quality standards in the district. The California Air Resource Board (ARB), in conjunction with ICAPCD, maintains a monitoring station at 220 Main Street in Brawley, less than 2 miles from the project site, which tracks ozone, fine particulates, ultra fine particulates, nitrogen dioxide, and carbon monoxide. These are the specific pollutants for which the area has nonattainment status.

The ICAPCD is already in nonattainment status for ozone, fine particulates, ultra fine particulates, nitrogen dioxide, and carbon monoxide. Any amount of air pollution over the attainment level is considered significant, whether individually or cumulatively. Because of this nonattainment status, a project-specific Air Quality Study and evaluation of mitigation measures would be necessary to evaluate potentially significant air quality impacts associated with the proposed project. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any available mitigation.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

### **Summary of Certified EIR**

The Certified EIR concluded that impacts resulting in a cumulatively considerable net increase of a criteria pollutant would be less than significant with mitigation incorporated. Long-term emissions will exceed significance thresholds for ROG, NO<sub>x</sub>, PM<sub>10</sub>, and CO. Short-term construction emissions would exceed the significance thresholds for ROG and NO<sub>x</sub>. In addition, the project will add to the County of Imperial's VMT and generate vehicle trips. Furthermore, it is assumed that the project's growth was not included in the 1991 AQAP. Therefore, the project is significant based on this criterion.

Construction emissions are generated by both on-site and off-site activities. On-site emissions principally consist of exhaust emissions (NO<sub>x</sub>, sulfur oxides [SO<sub>x</sub>], CO, ROG, PM<sub>10</sub>, PM<sub>2.5</sub>, and carbon dioxide [CO<sub>2</sub>]) from heavy-duty construction equipment, motor vehicle operation, and fugitive dust from disturbed soil. Off-site emissions are caused by motor vehicle exhaust from delivery vehicles, as well as worker traffic. Major construction-related activities include grading and clearing, building construction, asphalt paving, and application of architectural coatings. ICAPCD regional emission thresholds would be exceeded for ROG and NO<sub>x</sub>. Therefore, without mitigation, short-term construction emissions are considered to have a significant impact.

Operational, or long-term emissions include mobile and area source emissions. ICAPCD regional emission thresholds will be exceeded for ROG, NO<sub>x</sub>, PM<sub>10</sub>, and CO emissions. Therefore, without mitigation, the long-term emissions are considered to have a significant impact. Mitigation measures are designed to reduce trip generation, VMT, and on-site air pollution. Incorporation of MM AQ-9 through MM AQ-53 would reduce construction and operational emissions to less than the ICAPCD's significant thresholds. In addition, the mitigation measures would reduce the effects of the increased VMT, thereby decreasing the impact of inconsistency with the AQAP to less than significant. Therefore, impacts were determined to be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The proposed project would generate short-term construction emissions associated with site grading, the use of construction equipment, worker vehicle exhaust, and fugitive dust during excavation, grading, and other site preparation activities. Long-term impacts would occur from emissions generated from vehicle trips by residents and guests, as well as stationary emissions associated with natural gas and electrical energy consumption. Additionally, the proposed project would result in an increase in vehicular traffic beyond levels currently generated. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any available mitigation.

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

#### Summary of Certified EIR

The Certified EIR concluded that impacts to sensitive receptors would be less than significant with mitigation incorporated. The recommended siting criteria and recommendations in the ARB's Land Use Handbook were used to determine whether there is a potential health risk associated with the development of the project. The project will include both sensitive receptors and, potentially, sources of toxic air contaminants (TACs). The commercial and business park portions of the project may attract or generate diesel truck trips, a source of diesel particulate matter (DPM). The ARB has identified high traffic roadways as potential sources of hazardous emissions. Studies indicate that living close to roadways with high traffic volumes is associated with adverse health effects. Caltrans data indicates that SR-86 sustained approximately 6,600 vehicles per day in 2007. Although the project will construct residences near SR-86, the traffic volumes on SR-86 are not high enough to warrant a concern for health effects from DPM exposure.



The Land Use Handbook identifies rail yards as a source of DPM. The UPRR line on the east side of the project site is located near a proposed residential planning area. However, the railroad does not generate the same activities as a rail yard. The railroad will not include truck trips or switching, loading, idling, and maintenance testing operations. Therefore, the UPRR line's DPM-generating activity is substantially less than that of a rail yard and will not likely cause adverse health effects from DPM.

Construction equipment generates DPM, identified as a carcinogen. The State of California determined that DPM from diesel-fueled engines poses a chronic health risk with chronic inhalation exposure. However, it is highly unlikely that the construction would pose a toxic risk to residents of the project.

Commercial and business parks may attract or generate truck traffic that could be a source of DPM. However, there are no specific land uses identified, and no site plans proposed. Therefore, there is not enough information to accurately assess if commercial or business parks pose a potential health risk.

Mitigation measures are required to reduce the potential for land use conflicts and exposure to DPM. Impacts would be less than significant with MM AQ-54, which requires that proposed commercial land uses that have the potential to emit toxic air emissions be located as far as feasibly possible from existing and proposed sensitive receptors in accordance with ARB's Air Quality and Land Use Handbook. Impacts were determined to be less than significant with mitigation incorporated.

## **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate. This could result in pollutant concentrates released, exposing sensitive receptors in developed portions of the site. Project implementation would involve conversion of existing farmland to urban uses such as residential, commercial, industrial, and open space areas. Activities associated with project implementation could result in pollutants being released.

The project's potential construction may expose sensitive receptors to high concentrations of particulate matter and other criteria pollutants. Therefore, the proposed project's potential impact with respect to the local significance thresholds (LSTs) would require analysis. The LST impacts generated by the ongoing use of the industrial portion of the site would also be analyzed. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any available mitigation.

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

### Summary of Certified EIR

The Certified EIR concluded the impacts from emissions affecting a substantial amount of people would be less than significant with mitigation incorporated. The ICAPCD has a regulation that governs the discharge from any source, such quantities of air contaminants, which cause a nuisance or annoyance to any considerable number of persons or to the public. Land uses typically considered to be associated with odors include wastewater treatment facilities, waste disposal facilities, or agricultural operations. The Specific Plan may construct a WWTP. The proposed project would also continue agricultural operations in early phases in areas not being developed; however, agricultural operations are ubiquitous throughout the project region, and field crops are not considered a significant source of nuisance odor. Diesel exhaust and ROGs would be emitted during construction of the project, which are objectionable to some. However, emissions would disperse rapidly from the project site and therefore should not be at a level to induce a negative response. Therefore, the project will not subject a substantial number of people to objectionable odors.

With the implementation of MM AQ-55, the proposed WWTP would be designed to minimize the potential for both odor generation and release of odor emissions from WWTP, to the satisfaction of the County. Specific odor-reducing or mitigating design and operational measures, as well as any siting measures, would be provided to the County of Imperial Planning Department and Building Official for review and approval prior to issuance of building permit(s). Therefore, impacts were determined to be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The ICAPCD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding. Project implementation would involve conversion of existing farmland to urban uses such as residential, commercial, industrial, and open space areas.

While odors from nearby feedlots may be noticed in the project vicinity, these existing odors are not considered a major environmental impact to the area. As designed, the proposed project would not be involved in any of the aforementioned odor-generating activities. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any available mitigation.

### Mitigation Measures

To be discussed in the Supplemental EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.4 Biological Resources</b> <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

## Summary of Certified EIR

The Certified EIR concluded that impacts on species identified as a candidate, sensitive, or special-status species would be less than significant with mitigation. The literature review conducted for the project site indicated the potential for several sensitive species to occur within or adjacent to the project site. A complete list of species known to occur in the area was derived from the California Natural Diversity Database (CNDDDB). The list was refined based on site-specific information obtained during the field visit conducted by ERA (2005) and a subsequent site visit by MBA (2007).

California Species of Special Concern (SSC) identified on the site during the June and July 2005 reconnaissance included western burrowing owl (*Athene cunicularia*) and loggerhead shrike (*Lanius ludovicianus*). Three California Watch List (WL) species—white-faced ibis (*Plegadis chihi*), horned lark (*Eremophila alpestris*), and long-billed curlew (*Numenius americanus*)—were also observed during the reconnaissance survey.

Burrowing owls, which are a California SSC, were observed on-site and directly adjacent to the site during focused surveys conducted in 2005 and 2008. A total of 13 breeding pairs, five individuals, and four family units of burrowing owls were detected on-site and within 500 feet of the project site during the 2005 focused burrowing owl survey. During the most recent focused survey in June/July 2008, four active burrows and five burrowing owls were found on-site and five active burrows and eight burrowing owls were sighted off-site but within 160 feet of the Rancho Los Lagos property line. Burrowing owls occupying the site and adjacent areas may be subjected to potential direct impacts during implementation of project construction.

Several sensitive species were assessed as having potential to occur on-site, including Yuma Ridgeway's rail (*Rallus longirostris yumanensis*), which is a California Fully Protected (FP) species; and mountain plover (*Charadrius montanus*), which is a California SSC. Additionally, short-eared owls (*Asio flammeus*) and prairie falcons (*Falco mexicanus*), which are California SSC and California Watch List (WL), respectively, may utilize the site for foraging habitat. In addition, short-eared owls could potentially nest on the site. Several sensitive bat species were assessed as having potential to forage over the site and the adjacent drainage ditches. The Yuma hispid cotton rat (*Sigmodon hispidus eremicus*), a California SSC, may also utilize the drainage ditches and forage in the agricultural fields. The Sonoran Desert toad (*Incilius alvarius*), also a California SSC, has moderate potential to occur and potentially breed in the adjacent drainage ditches. The Certified EIR determined that loss of foraging habitat due to implementation of the project could potentially affect several special-status species, including white-faced ibis, horned lark, long-billed curlew, loggerhead shrike, and sensitive bat species. Other sensitive species potentially affected include the Yuma hispid cotton rat, short-eared owl, prairie falcon, and Sonoran Desert toad. However, similar habitats of equivalent quality and type are available for these species throughout the region. Sonoran Desert toad may be subject to direct mortality if individuals are utilizing the site during grading or construction activities.

The Certified EIR determined that the presence of burrowing owls on the project site would necessitate the implementation of mitigation measures to avoid or minimize impacts, including protection of foraging habitat, artificial burrows, passive relocation, avoidance, and long-term

management of open space for burrowing owls. Therefore, impacts would be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The current analysis of the Rancho Los Lagos Specific Plan similarly concluded that project impacts to species identified as candidate, sensitive, or special-status species would be less than significant with mitigation. Candidate, sensitive, or special-status plant and wildlife species have been recorded within the regional vicinity (Appendix A). The project site may also contain suitable habitat to support the occurrence of other special-status plant and wildlife species. Development of the proposed project could directly or indirectly impact special-status species and their habitat. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

### **Summary of Certified EIR**

The Certified EIR concluded that impacts to riparian habitat or other sensitive natural communities would be less than significant with mitigation incorporated. The current on-site riparian habitat (freshwater marsh) exists as a result of artificial manufactured hydrology and would be considered low to moderate habitat quality due to the low vegetation diversity and relative isolation. However, the vegetation has potential to support wildlife species, including sensitive species. As such, impacts to the 4.5 acres of freshwater marsh by the proposed development would warrant mitigation in the form of creation, restoration, enhancement, or preservation and a formal wetland delineation to identify riparian habitat on-site. Therefore, impacts to riparian habitat would be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Two vegetation communities are present on the project site, including cultivated agricultural fields and freshwater marsh. The cultivated agriculture fields are characterized by the production of grass crops (i.e., alfalfa, Bermuda grass, non-native ruderal vegetation) and is not considered a sensitive natural community. The freshwater marsh, which comprises 4.5 acres on the project site, is made up of the manufactured IID canals and characterized by ruderal, water-loving species frequently found in irrigation reservoirs, canals, and drainage ditches in the project vicinity. This manufactured freshwater marsh is classified as riparian habitat with the potential to support sensitive wildlife species and is considered sensitive by the CDFW. Implementation of the proposed project would result in direct and indirect impacts to the 4.5 acres of freshwater marsh during construction-related activities. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- 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?**

### Summary of Certified EIR

The Certified EIR concluded that impacts on State or federally protected wetlands would be less than significant with mitigation incorporated. There are approximately 14.2 to 15.5 acres of project area irrigation canals that may be considered jurisdictional waters under the Clean Water Act (CWA), or State of California Fish and Game Code 1600, or the State of California Porter-Cologne Water Quality Act, as well as another 4.3 acres in irrigation reservoirs on-site. The IID irrigation canals and drains and the on-site private irrigation ditches and holding ponds were found to be exempt from regulation under Section 404(f) of the CWA during the preparation of the Certified EIR. Once agricultural operations cease on the project site, it is very unlikely that the limited annual rainwater would be sufficient to sustain any regulated waters or wetlands on-site. However, depending on the timing between cessation of agriculture and the initiation of development, remnant wetland features may be present. A wetland delineation and evaluation should be conducted prior to development to determine the necessary permitting required by the USACE, RWQCB, and CDFW. As such, mitigation measures would require a wetland delineation; consultation with the USACE, RWQCB, CDFW, and IID; and permitting, as needed. Therefore, impacts would be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** As discussed above, irrigation canals and reservoirs exist on the project site and may qualify as protected jurisdictional waters and/or wetland under federal or State laws. Project implementation could have a potential impact on these potentially jurisdictional wetlands. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- 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 wildlife nursery sites?**

### Summary of Certified EIR

The Certified EIR concluded that impacts to wildlife corridors or nursery sites would be less than significant with mitigation incorporated. Direct impacts of the Specific Plan include potential impacts to actively nesting birds that are protected under the MBTA and California Fish and Game Codes. Species such as Yuma Ridgeway's rail, white-faced ibis, and long-billed curlew could potentially nest in the freshwater marsh on-site, and burrowing owls, short-eared owls, horned larks, loggerhead shrikes, and other common native avian species could potentially nest in agricultural fields. Actively nesting birds may be subject to mortality or nest loss if construction takes place during the breeding season. Indirect impacts to nesting birds include increased human presence, dust, lighting, and noise above the 60 decibel (dB) level. Additionally, the project could cause direct impacts to mountain plovers that use agricultural fields for wintering grounds during migration.

If construction activities are initiated during the avian nesting season, pre-construction surveys, nest avoidance, and sound reduction measures shall be required.

The potentially significant project-specific environmental effects would be eliminated or substantially lessened to a level that is less than significant by virtue of mitigation measures. Therefore, impacts would be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Although most of the project site is disturbed agricultural land, the site is located along a leg of the Pacific Flyway used by many species of migratory birds. As such, there is a strong presence of migratory birds in the vicinity. While most are seasonal visitors, some have breeding populations in the vicinity, especially due to the proximity of the Salton Sea. Implementation of the proposed project has the potential to impact migratory and/or nesting birds due to construction-related activities. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR concluded that project implementation would not conflict with local policies or ordinances protecting biological resources such as trees. The Certified EIR did not find any conflicts with the goals and policies included in the County's General Plan Conservation Element. The Certified EIR analyzed the Specific Plan for consistency with the following goals and policies regarding the preservation of biological resources:

- |                      |   |
|----------------------|---|
| <b>Goal 2</b>        | <b>The County will preserve the integrity, function, productivity, and long-term viability of environmentally sensitive habitats, and plant and animal species.</b> |
| <b>Objective 2.1</b> | Conserve wetlands, freshwater marshes, and riparian vegetation.   |
| <b>Objective 2.2</b> | Protect significant fish, wildlife, plant species, and their habitats.  |
| <b>Objective 2.3</b> | Protect unique, rare, and endangered plants and animals and their habitats.   |
| <b>Objective 2.4</b> | Use the Environmental Impact Report process to identify, conserve and enhance unique vegetation and wildlife resources.   |
| <b>Objective 2.5</b> | Give wildlife conservation a high priority in County park acquisition and development programs.   |
| <b>Objective 2.6</b> | Attempt to identify, reduce, and eliminate all forms of pollution which adversely impact vegetation and wildlife.   |
| <b>Objective 2.7</b> | Discourage the use of wild native animals as pets.  |



The Certified EIR found that future uses and environmental practices included in the Specific Plan would meet some of the objectives of the County General Plan, such as the implementation of a Water Quality Management Plan (WQMP) to control runoff of urban pollutants; a series of water features that may continue to attract bird to the site; and the irrigation system within the site, which will continue to function delivering water to other agricultural sites in the area. Thus, no impact would occur.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**No impact.** The City's Conservation & Open Space Element and the Resource Management (Conservation) Element (RME) establishes goals/policies protecting biological resources in the project vicinity.<sup>12</sup> The County and City standard is consistent with State and federal regulations. Furthermore, RME Objective 2.1.1 from the City's General Plan is similar to Goal 2 from the County's General Plan Conservation Element. RME Objective 2.1.1 aims to conserve and protect natural plant and animal communities, including wildlife habitats, riparian areas, wildlife movement corridors, wetlands, and significant tree stands, and to include biological assessments for development proposals. Because this objective is comparable to the County's goals and policies, the proposed project would not require additional analysis. For example, similar to the Certified EIR, the proposed project would include water features that would support birds, and would include an irrigation system, as well as a WQMP, which would be consistent with local policies or ordinances protecting biological resources. Therefore, consistent with the Certified EIR, implementation of RME Objective 2.1.1 would minimize potential biological impacts. Implementation of the City's General Plan RME Objective 2.1.1 would result in the conservation and protection of natural plant and animal communities, which is consistent with the analysis provided in the Certified EIR.

The proposed project must be consistent with the requirements of all trustee and responsible agencies for approval. Therefore, project implementation would not conflict with local policies or ordinances associated with biological resources preservation. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

#### **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?**

### **Summary of Certified EIR**

The Certified EIR concluded that the project site is not located within an adopted Habitat Conservation Plan or other Natural Community Conservation Plan area. However, the IID is currently preparing a Habitat Conservation Plan (HCP) and Natural Community Conservation Plan (NCCP), within which the proposed project is situated. The IID HCP/NCCP only applies to IID water delivery options and does not cover development activities. The HCP/NCCP has not yet been adopted; however, the IID is assembling lands that would comprise the managed marsh and expanded managed marsh habitats. A search of the CNDDDB revealed that the project site is not located within designated critical habitat. The Specific Plan would not conflict with provisions of an adopted HCP or

<sup>12</sup> City of Brawley. 2008. City of Brawley General Plan. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 21, 2022.

NCCP. Therefore, the proposed project would not impact an adopted HCP or NCCP or designated critical habitat.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**No impact.** The project site is not located within jurisdiction of an adopted HCP or NCCP. The General Plan Resource Management Element meets State requirements concerning the Conservation and Open Space Element as defined in the State Government Code. The adopted Conservation Element must contain policies that further protect and maintain the State's natural resources, such as water, soils, wildlife, etc.<sup>13</sup> The proposed project must be consistent with the requirements of all trustee and responsible agencies for approval. Therefore, project implementation would not conflict with the provisions of an adopted HCP, NCCP, designated critical habitat, or other approved local, regional, or State HCP or conservation area. This issue will be analyzed in the Supplemental EIR to identify potential impacts along with any requisite mitigation.

### **Mitigation Measures**

To be discussed in the Supplemental EIR.

---

<sup>13</sup> Ibid.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.5 Cultural Resources and Tribal Cultural Resources</b>				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

The Certified EIR concluded that the impacts to the significance of a historical resource would be less than significant with mitigation incorporated. Over the last several thousand years, a series of ancient lakes in Imperial Valley have formed and receded. Prehistoric populations of humans and other creatures followed the changing shorelines of these lakes. Because of the possibility of buried prehistoric deposits associated with ancient lakeshores, periodic archaeological monitoring is

recommended to focus on searching any old shoreline features that may be uncovered during grading or construction. Periodic monitoring of the project would also focus on areas of the project that correspond to the locations of historic structures. In addition, the Central Main Canal, as well as the other canals and drainages on the project property that are part of the historic IID canal system may be impacted by the Specific Plan. However, because canal links bordering the project are still in use and would not be diverted or capped as a result of the Specific Plan, adverse impacts are not expected.

Incorporation of MM CR-1 would provide monitoring of the project, and as a result, reduce impacts to buried prehistoric deposits associated with ancient lakeshores to a level of less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The *Phase 1 Archaeological Survey for the Rancho Los Lagos Project* (2006) and a subsequent records search concluded there are no historical or archaeological resources as defined in CEQA Guidelines Section 15064.5 within project site boundaries. Because of the area's rich history, the possibility exists to find undiscovered resources, but project implementation is not likely to degrade the significance of any resources. The IID canals and drains on-site do have historical significance, and they may be altered as a result of project development without causing any potential impacts to cultural or historical resources.

Cultural resource surveys have cataloged and described the resources on-site; therefore, the impact to these resources would be less than significant. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR concluded that the impacts to the significance of a historical resource would be less than significant with mitigation incorporated. Over the last several thousand years a series of ancient lakes in Imperial Valley have formed and receded. Prehistoric populations of humans and other creatures followed the changing shorelines of these lakes. Because of the possibility of buried prehistoric deposits associated with ancient lakeshores, periodic archaeological monitoring is recommended that focuses on searching any old shoreline features that may be uncovered during grading or construction. Periodic monitoring of the project would also focus on areas of the project that correspond to the locations of historic structures. In addition, the Central Main Canal, as well as the other canals and drainages on the project property that are part of the historic IID canal system may be impacted by the Specific Plan. However, because canal links bordering the project are still in use and would not be diverted or capped as a result of the Specific Plan, adverse impacts are not expected.

Incorporation of MM CR-2 would provide monitoring of the project. Therefore, impacts would be less than significant with mitigation incorporated.

## **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Define Impact.** Click and type narrative to describe impact.

**Less than significant impact.** As discussed above (a), the project site does not contain historical or archaeological resources as defined in Section 15064.5. Project implementation would not cause a substantial adverse change in the significance of an archaeological resource. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

#### **Summary of Certified EIR**

The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. California Health and Safety Code Sections 7050.5-7055 describe the general provisions for the discovery of human remains. If human remains are discovered during excavation of a site, Health and Safety Code 7050.5 requires excavation to stop near the find. The County Coroner must be called to investigate the remains and make an appropriate recommendation for the treatment and disposition of the remains. If the coroner has reason to believe the remains may be of a Native American, California Public Resources Code Section 5097.98 requires notification of the Native American Heritage Commission (NAHC).

Whenever the NAHC receives notification of a discovery of Native American human remains from a County Coroner, it must immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American remains and may recommend to the owner of the person responsible for the excavation work a means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants would complete their inspection and make their recommendation within 24 hours of notification by the NAHC. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

If the NAHC is unable to identify a descendant, or the descendant identified fails to make a recommendation, or the landowner or his or her representative rejects the recommendation and the mediation provided for in subdivision (k) of Section 5097.94 of the California Public Resources Code fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative would re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance. Therefore, impacts would be less than significant with mitigation incorporated.

## **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Define Impact.** Click and type narrative to describe impact. **Potentially significant impact.** There are no cemeteries located in the immediate area that would be affected by the proposed project. In addition, the project sites do not contain any religious or sacred structure. Thus, no impact on existing religious facilities in the City will occur with the proposed project. Standard mitigation

measures relating to the discovery of human remains must be applied to the project. Unique paleontological resources may exist under the project site and could be disturbed by construction activities. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- d) **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).**

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the previous EIR was prepared. No conclusion was made in the Certified EIR regarding the significance level of impacts related to being listed or eligible for listing in the California Register of Historical Resources, or in a local register.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Define Impact.** Click and type narrative to describe impact. **Potentially significant impact.** A search through the California Office of Historic Preservation, California Historical Resources database indicated that the project site does not contain any historic structures listed in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). Additionally, it was determined that the project site does not qualify for listing in either the NRHP or CRHR. Because of the large size of the project and the rich history of the area, there is potential to disturb human remains interred outside of formal cemeteries. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- e) **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.**

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the previous EIR was prepared. No conclusion was made in the Certified EIR regarding the significance level of impacts related to resources determined by the Lead Agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** There is no indication of any unique paleontological resources or unique geologic features present on the proposed project site. However, an updated paleontological investigation would be completed to document the absence of paleontological resources within project site boundaries. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

**Define Impact. Click and type narrative to describe impact. Mitigation Measures**

To be discussed in the Supplemental EIR.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.6 Energy</b> <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because the County did not include this in its thresholds of significance at the time. No conclusion was made in the Certified EIR regarding the significance level of the proposed project's impacts related to wasteful, inefficient, or unnecessary consumption of energy resources. However, the Certified EIR stated certain measures would be included to reduce the energy demand of the proposed project, thereby reducing the proposed project's indirect emissions related to off-site energy production.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The proposed project involves development of approximately 1,076 acres of active farmland. Activities associated with development are typically associated with heavy machinery and could result in excessive energy resources being used during development. During operations, the proposed project is anticipated to utilize energy resources as well. These issues will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### Summary of Certified EIR

No conclusion was made in the Certified EIR regarding the significance level of impacts related to conflict with, or obstruction of a State or local plan for renewable energy or energy efficiency. However, the Certified EIR stated that certain measures would reduce the energy demand of the project. Prior to the issuance of a building permit, the applicant shall demonstrate that the design of

the proposed buildings or structures are compliant with the Imperial Irrigation Districts California Green Builder Program (CGB) and exceed the 2008 Building Energy Efficiency Standards for Residential and Nonresidential Buildings by 15 percent. Energy efficiency measures are assumed to increase the energy efficiency of residential and nonresidential buildings by 20 percent.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** According to the City General Plan, the RME addresses and protects environmental resources, including energy resource conservation. The Conservation and Open Space Element addresses and preserves a variety of environmental resources, including energy.<sup>14</sup> This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

### **Mitigation Measures**

To be discussed in the Supplemental EIR.

---

<sup>14</sup> City of Brawley. 2008. City of Brawley General Plan. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 21, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.7 Geology and Soils</b> <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

**Would the project:**

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

## Summary of Certified EIR

The Certified EIR concluded that impacts from the rupture of a known earthquake fault would be less than significant with mitigation incorporated. Potential seismic hazards at the site are associated with ground shaking from an earthquake event along nearby active faults. An Alquist-Priolo Earthquake Fault Zone extends 500 feet into the southeastern corner of the project area. According to the Preliminary Geotechnical Investigation (2006), fault trenching was conducted and the results indicated that there is no evidence of active faulting below the project area. No habitable structures are planned within this area; however, a business park with associated buildings is planned for the location. Ground shaking hazards are typically mitigated through design features in accordance with the Uniform Building Code. Therefore, impacts were determined to be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** According to the California Geologic Survey (CGS), Earthquake Zones of Required Investigation, a portion of the proposed project site (APN# 040-130-012) lies within an Earthquake Fault Zone.<sup>15</sup> The Alquist-Priolo Earthquake Fault Zone for the Imperial Earthquake Fault extends approximately 500 feet into the southeastern portion of the proposed project site (Exhibit 2). A fault rupture hazard investigation was conducted in 2006 by Geotechnics, Inc., who reported that no evidence of faulting was observed within the fault trench excavation and that potential for surface rupture beneath the project site is low. Potential fault-related hazards are typically mitigated through design features in accordance with the Uniform Building Code. Adherence to standard conditions and uniform codes, plus application of all the project design features (MM GEO-1, incorporated into this Initial Study from the Certified EIR) recommended in the geotechnical report, would reduce potential impacts to less than significant levels. The level of significance with mitigation incorporated is less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### ii) Strong seismic ground shaking?

## Summary of Certified EIR

The Certified EIR concluded that impacts from the rupture of a known earthquake fault would be less than significant with mitigation incorporated. Potential seismic hazards at the site are associated with ground shaking from an earthquake event along nearby active faults. The nearest known fault is within the Imperial Fault Zone located adjacent to the southern property line within the eastern portion of the site. No active faults were observed during the geologic investigation of the site. Ground shaking hazards are typically mitigated through design features in accordance with the Uniform Building Code. Therefore, impacts were determined to be less than significant with mitigation incorporated.

<sup>15</sup> California Geologic Survey (CGS). 2022. CGS Information Warehouse: Regulatory Maps. Website: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>. Accessed November 9, 2022.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** The City of Brawley is susceptible to strong ground shaking. The project site is located in the seismically active Imperial Valley of Southern California with numerous mapped faults of the San Andreas Fault System traversing the region. The San Andreas Fault System consists of the San Andreas, San Jacinto, and Elsinore Fault Zones in Southern California. According to CGS, a portion of the proposed project site is located in the Imperial Fault Zone. The site is approximately 0.5-mile from the Imperial Fault. Because of the proximity of the proposed project site and the Imperial Fault, the site could experience strong seismic ground shaking.

Based on the Geological and Geotechnical Hazard Report prepared by Landmark Consultants, Inc., in September 2022 (Appendix B), it was determined that there was no evidence of an active fault below the project site.<sup>16</sup> However, very strong ground shaking can occur at the project site. Future development resulting from the implementation of the proposed project could result in potential significant impacts related to seismic ground shaking. However, ground shaking hazards are typically mitigated through design features in accordance with the most recent adopted Uniform Building Code. Potential ground shaking-related hazards are typically mitigated through design features in accordance with the Uniform Building Code. Adherence to standard conditions and uniform codes, plus application of all the project design features (MM GEO-1, incorporated into this Initial Study from the Certified EIR) recommended in the geotechnical report, would reduce potential impacts to less than significant levels. The level of significance with mitigation incorporated is less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

## Summary of Certified EIR

The Certified EIR concluded that impacts from seismic related ground failure would be less than significant with mitigation incorporated. A portion of the soils underlying the site consists of silt and sand deposits that may be susceptible to liquefaction during an earthquake. However, the presence of thick (approximately 10 feet deep) near-surface, high plasticity, cohesive soils on the site significantly reduces the potential effects of liquefaction. The catastrophic effects of post-liquefaction settlement may also be mitigated by remedial grading and by the structural design of the foundation systems associated with highly expansive soils. Therefore, impacts were determined to be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** The City of Brawley is susceptible to strong ground shaking, which may result in liquefaction. A portion of the proposed project site has not been evaluated by CGS for liquefaction hazards. However, the CGS surveyed portion of the

<sup>16</sup> Landmark Consultants, Inc. 2022. Geological and Geotechnical Hazard Report—Rancho Los Lagos Development. September.

project site does not indicate any Liquefaction Zone.<sup>17</sup> A portion of the soils underlying the site may be susceptible to liquefaction during an earthquake. However, the presence of thick (approximately 10 feet deep) near-surface, high plasticity, cohesive soils on the site significantly reduces the potential surface effects of liquefaction. The potential post-liquefaction settlement on-site would be approximately 1.5 to 4 inches and may be mitigated by remedial grading and by the structural design of foundation systems associated with highly expansive soils. Potential ground failure-related hazards are typically mitigated through design features in accordance with the Uniform Building Code. Adherence to standard conditions and uniform codes, plus application of all the project design features (MM GEO-1, MM GEO-3, and MM GEO-8, incorporated into this Initial Study from the Certified EIR) recommended in the geotechnical report, would reduce potential impacts to less than significant levels. The level of significance with mitigation incorporated is less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**iv) Landslides?**

**Summary of Certified EIR**

The Certified EIR concluded that there would be no impact from landslides. The project site is essentially flat and there is no possibility of landslide occurring on-site. Therefore, the proposed project was determined to have no impact.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The project site and the surrounding areas are generally flat. A portion of the proposed project site has not been evaluated by CGS for landslide hazards. The surveyed portion of the project site does not indicate any Landslide Zone.<sup>18</sup> Based on an evaluation and field survey performed by Landmark Geo-Engineers and Geologists, no ancient landslides are shown on geologic maps of the vicinity and no indications of landslides were observed during the site investigation.<sup>19</sup> The nearest sloped terrain is the incised New River channel located approximately 1 mile west of the project site. There is a slight potential for small scale landslides (sloughing of canal and drain banks) along the open Pearsol Drain and Rockwood Canal. Because of the relatively flat topography of the project site, impacts related to landslides would be less than significant. No additional analysis is required in the Supplemental EIR.

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

**Summary of Certified EIR**

The Certified EIR concluded that there would be no impact from substantial soil erosion or loss of topsoil. The project site will be stabilized after grading, and open spaces will be landscaped with

<sup>17</sup> California Geologic Survey (CGS). 2022. Earthquake Zones of Required Investigation—CGS Home page. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 9, 2022.

<sup>18</sup> California Geologic Survey (CGS). 2022. Earthquake Zones of Required Investigation—CGS Home page. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 9, 2022.

<sup>19</sup> Landmark Geo-Engineers and Geologists. 2022. Geological and Geotechnical Hazard Evaluation—Rancho Los Lagos Evaluation. September.

non-erosive features, as required by the County development codes. Therefore, the Specific Plan was determined to have no impact.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less significant impact with mitigation incorporated.** The proposed project site contains various phases of active cultivation and contains canals and drains that are used to transport water to and from the agricultural resources located on-site. Because of the low rainfall and relatively gentle slope of the terrain, the site is not considered susceptible to stormwater erosion. As with all arid regions, unprotected or untreated soils are subject to wind-blown erosion. Development of the proposed project plan, including urbanization by converting existing Farmland to nonagricultural use, could result in substantial soil erosion and loss of topsoil during construction. Project activities that can result in soil erosion consist of removing current vegetation and creating impervious surfaces that cause increased surface runoff which in turn can result in downstream soil erosion. These activities may be a slow process that continues over extended periods of time, or it may occur at faster rates (i.e., during heavy rains, or winds).

The potential result in substantial soil erosion or the loss of topsoil at the project site is substantial. However, soil erosion loss is typically mitigated in accordance with standard conditions and uniform codes. Application of all the project design features (MM GEO-1, MM GEO-2, MM GEO-3, MM GEO-6, and MM GEO-7 from the Certified EIR) recommended in the geotechnical report would also reduce potential impacts to less than significant levels. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

### **Summary of Certified EIR**

The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. On-site clay soils are highly expansive; therefore, if these materials are used for direct support of planned improvements, some heave of foundations, slabs, and flatwork may be anticipated. In addition, the surface lacustrine deposits and un-compacted fill are compressible under increased structural loads, and in their current condition are unsuitable for support of the planned structures and improvements. The effects of settlement due to compressible soils should be mitigated by remedial grading. Therefore, impacts were determined to be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact with mitigation incorporated.** Soils on the project site are predominantly silty clay types. Combined with the arid climate features, they do not have the features necessary to cause landslide, lateral spreading, subsidence, liquefaction, or collapse. The



surveyed portion of the project site does not indicate any Liquefaction or Landslide Zone.<sup>20</sup> Because of the relatively flat topography of the project site, landslides are not expected to occur on- or adjacent to the project site. Regional subsidence has not been documented in the vicinity of the project site; therefore, the risk of regional subsidence is considered low.

As discussed above, a portion of the soils underlying the site may be susceptible to liquefaction during an earthquake. The potential post-liquefaction settlement may be mitigated by remedial grading and by the structural design of foundation systems. Potential geologic hazards are typically mitigated through design features in accordance with the Uniform Building Code. Adherence to standard conditions and uniform codes, plus application of all the project design features (MM GEO-1, MM GEO-3, MM GEO-4, MM GEO-5, MM GEO-8, MM GEO-9, and MM GEO-10 from the Certified EIR) recommended in the geotechnical report, would reduce potential impacts to less than significant levels. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

### Summary of Certified EIR

The Certified EIR concluded that there would be less than significant impact with mitigation incorporated regarding substantial risks to life or property from expansive soil. Some on-site clay spoils are highly expansive; therefore, if these materials are used for direct support of planned improvements, some heave of foundations, slabs, and flatwork may be anticipated. In addition, the surface lacustrine deposits and un-compacted fill are compressible under increased structural loads, and in this current condition are unsuitable for support of the planned structures and improvements. The effects of settlement due to compressible soils should be mitigated by remedial grading. Therefore, impacts were determined to be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** Based on an evaluation and field survey performed by Landmark Geo-Engineers and Geologists, potential risks of expansive soil at the project site are considered moderate. In general, much of the near-surface soils within the project site consist of silty clays and clays having a moderate expansion potential. The clay is expansive when wetted and can shrink with moisture loss (drying). Development of building foundations, concrete flatwork, and asphaltic concrete pavements should include provisions for mitigating potential swelling forces and reduction in soil strength, which can occur from saturation of the soil. Expansive soil mitigation (for foundations) would be required. Potential geologic hazards are typically mitigated through design features in accordance with the Uniform Building Code. Adherence to standard conditions and uniform codes, plus application of all the project design features (MM GEO-1, MM GEO-3, and MM GEO-8 from the Certified EIR) recommended in the geotechnical report, would

<sup>20</sup> California Geologic Survey (CGS). 2022. Earthquake Zones of Required Investigation—CGS Home page. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed November 9, 2022.

reduce potential impacts to less than significant levels. The level of significance with mitigation incorporated is less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- 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?**

### Summary of Certified EIR

The Certified EIR concluded that there would be no impact regarding the use of septic tanks or wastewater disposal systems. No septic tanks or alternative wastewater disposal systems are associated with the Specific Plan. A conventional sewage system would be installed. Therefore, it was determined that there would be no impact.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The project site would construct a wastewater treatment facility on-site. A conventional sewage system would be installed and septic systems would not be used. The proposed project site would have the capability of adequately supporting the disposal of wastewater using septic tanks, leave fields, and large pipes for building structures. Regardless, no septic tanks or alternative wastewater disposal systems are associated with this project. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### Mitigation Measures

The geotechnical report included several recommendations which were incorporated into the Certified EIR as mitigation measures to reduce the significance of geologic problems such as subsidence, corrosion, liquefaction, and heave. They are incorporated into this Initial Study as mitigation measures to assure compliance with important design criteria:

- MM GEO-1 Plan review.** All recommendations of the geotechnical report shall be incorporated in the project design. The final development plans shall be reviewed by a State certified geologist. Supplemental investigation may be necessary based on the final grading plans.
- MM GEO-2 Monitoring.** A State certified Geologist shall observe site grading, excavation of foundations and soil improvements. Continuous feedback and testing may be necessary.
- MM GEO-3 Earthwork.** Grading and earthwork shall be conducted in accordance with the applicable grading ordinance and Appendix Chapter 33 of the Uniform Building Code, including: Removal of deleterious materials such as vegetation, trash and debris; Removal and compaction of undocumented fill and replacement with uniformly compacted fill; Replacement of the upper four feet of soil in building areas and two feet of soil in improvement areas with non-expansive soil or lime treated

soil; All fill and backfill to be placed associated with site development should be accomplished at a minimum of five (5) percentage points over optimum moisture conditions using equipment capable of producing a uniformly compacted product. The relative compaction should be accomplished between a minimum of 87 percent and a maximum of 92 percent of the maximum dry density based on ASTM D1557.

- MM GEO-4**     **Fill Slopes.** In all areas where new fill slopes are proposed, the existing undocumented fill or the upper two feet of supporting soil, whichever is deeper, shall be excavated to firm native soil. These slopes should be no steeper than 2:1 (horizontal:vertical). Fill and backfill should be placed in horizontal lifts at appropriate thickness for equipment spreading, mixing and compacting the material. Slope faces should be compacted to the recommended degree of compaction.
- MM GEO-5**     **Shrinkage.** Shrinkage of undocumented fill on the order of 20 to 25 percent should be anticipated.
- MM GEO-6**     **Surface Drainage.** The ground surface around structures shall be graded so that water flows rapidly away from the structures and the top of slopes without ponding occurring. Planters shall be built so that water will not seep into foundations, slab or pavement areas. Roof drainage shall be channeled by pipe into storm drains or discharged at least 10 feet away from buildings. Irrigation should be limited to the minimum necessary to sustain landscaping.
- MM GEO-7**     **Temporary Excavations and Dewatering.** Temporary excavation shall be laid back or shored in conformance with Cal/OSHA guidelines to protect workers from caving soils or debris. Excavations within 1-foot of the groundwater level shall be stabilized. Dewatering may be required for structures below grade.
- MM GEO-8**     **Preliminary Foundation Recommendations.** Post-tension foundations shall be developed in accordance with procedures described by the Post-tensioning Institute. For lateral resistance, a friction coefficient of 0.25 and a passive pressure of 250 pounds per square foot, per foot of depth, shall be required. Foundation setbacks shall be a minimum of 8 feet from the base of the footing to any descending slope. Moisture protection shall be provided to prevent moisture penetration from soil to slab. Regardless of the method used the moisture vapor barrier should extend beneath all foundation elements and grade beams; should extend above soil grade; and the exposed foundation shall be painted with a latex sealer. In order to reduce potential for differential movement of the exterior slabs, the upper two feet of subgrade materials shall be brought to a minimum of 5 percent above optimum moisture content immediately prior to placement of concrete. Exterior slabs shall be at least 4 inches thick. Crack control joints shall be placed a minimum of 10 feet for slabs and 5 feet for sidewalks. Steel reinforcement is recommended. Exterior slabs constructed on moisture conditioned expansive clay shall be reinforced with at least 6x6 W2.9/W2.9 welded wire fabric placed securely at mid height of the slab section. Foundation designs shall be performed by the project structural engineer, but subject to revision depending on geotechnical parameters observed during grading.

- MM GEO-9**     **Reactive Soils.** Adjustments to the concrete mix and corrosion control are justified and shall be implemented to mitigate the adverse corrosive effects of the soil. A corrosion control consultant shall be contacted to provide corrosion control recommendations.
- MM GEO-10**    **Pavement Sections.** Residential streets shall have at a minimum 3 inches of asphalt over 14 inches of aggregate base. Residential cul-de-sacs shall have at a minimum 3 inches of asphalt over 10 inches of aggregate base. The upper 12 inches of pavement subgrade shall be scarified prior to construction of the pavement section, brought to above optimum moisture content and compacted to at least 90 percent of the maximum density (AST MD1557). The aggregate base should be compacted to at least 95 percent relative compaction and should conform to Section 26 of the Caltrans Standard Specifications of Section 200-2 of the *Standard Specifications for Public Works Construction (SSPWC)*. Asphalt concrete should be compacted to at least 95 percent relative compaction based on the Hveem density.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.8 Greenhouse Gas Emissions</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Construction and operational activities of the proposed project would emit greenhouse gas (GHG) emissions. FCS will prepare the GHG section using, in part, the Air Quality and GHG Analysis technical study evaluated in the Certified EIR to identify impacts. The supporting technical data shall be provided as an appendix to the Supplemental EIR. Where feasible, FCS shall identify mitigation measures to offset any potentially significant impacts.

### Would the project:

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

### Summary of Certified EIR

The Certified EIR did not include this checklist question because this checklist question did not exist at the time the Certified EIR was prepared. No conclusion was made in the Certified EIR regarding the significance of the level of impacts related to the generation of greenhouse gas emissions. However, the Certified EIR stated that the project will result in GHG emissions in the State, from both construction activities and long-term operations. Construction of the project was estimated to generate more than 15,000 total metric tons of CO<sub>2</sub>. However, Assembly Bill (AB) 32 requires that the greenhouse emissions generated in California in the year 2020 be equal or less than California's statewide inventory from 1990. Project operations were calculated to generate approximately 88,633 metric tons (MT) carbon dioxide equivalent (CO<sub>2</sub>e) after full buildout. In addition, the proposed project would result in a significant amount of business-as-usual (BAU) emissions.

Although the project proposed a large mixed-use development that incorporates both jobs and housing, the project would construct more than 3,800 new residential units, 26 acres of community shopping, and 89 acres of business park in the County. The project site is close to the City of Brawley, a city with an estimated population of approximately 25,700 in 2007. The project represents a significant increase in residents in the County and is not located substantially close to existing urbanized areas. Incorporation of the recommended mitigation measures would reduce expected

operational GHG generation by at least 10 percent, and incorporation of offsets would achieve an additional 18 percent reduction. Therefore, the project would achieve the required 28 percent emission reduction. Therefore, the project would not hinder or delay the State's ability to meet the reduction targets contained in AB 32.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR did not include this checklist question because this checklist question did not exist at the time the Certified EIR was prepared. No conclusion was made in the Certified EIR regarding the significance of the level of impacts related to the generation of greenhouse gas emissions. However, the Certified EIR stated that the project is close to the City of Brawley, a city with an estimated population of approximately 25,700 in 2007. The project represents a significant increase in residents in the County and is not located substantially close to existing urbanized areas. Incorporation of the recommended mitigation measures would reduce expected operational GHG generation by at least 10 percent, and incorporation of offsets would achieve an additional 18 percent reduction. Therefore, the project would achieve the required 28 percent emission reduction. Therefore, the project would not hinder or delay the State's ability to meet the reduction targets contained in AB 32.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

## **Mitigation Measures**

To be discussed in the Supplemental EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.9 Hazards and Hazardous Materials</b> <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

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

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would result in a less than significant effect with mitigation incorporated. The specific proposed commercial and light industrial uses of the site are



not known at present but could conceivably present hazards associated with uses such as gas stations, pool supply stores, and auto body shops. The County's Development Code, the fire department regulations, and the State's occupational safety codes regulate the use, storage, and transport of hazardous materials within the County. Once the type of use is known, the types of hazardous materials associated with this use will also be known. Businesses handling hazardous materials are required to register with the local fire department and have appropriate safety data sheets (SDS) on-site so that workers and emergency responders will be aware of what chemicals and/or hazardous materials are located at a particular site. Acutely hazardous land uses are not allowed in the proposed zoning areas of the Specific Plan. As long as County and State regulations regarding hazardous materials are implemented, no significant impacts related to hazardous materials are expected.

Hazardous materials can be transported by rail and could potentially travel through the project site. If a train derailed while carrying a toxic load there could be adverse environmental consequences. Appropriate registration of contents and the display of appropriate placards are required for rail transportation just as they are for highway transportation. Therefore, impacts would be less than significant with mitigation incorporated.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact with mitigation incorporated.** Operation of the majority of the proposed project would not involve the routine transport, use, or disposal of hazardous materials. However, the approximately 119-acre Industrial Business Park included in the proposed project, located east of the Southern Pacific Railroad right-of-way which traverses the project site, would be used for a mixture of industrial and business land uses. The proposed project would include commercial uses west of the railroad as well. The specific proposed commercial and light industrial uses of the site are not known at present, but could conceivably involve the transport, use, or disposal of hazardous materials. Additionally, according to the City General Plan, hazardous materials are routinely transported along both the Southern Pacific Railroad and SR-86, which is adjacent to the northwest and western boundary of the project site. Additionally, liquid petroleum is transported through underground pipelines, which are located approximately 50 feet parallel the Southern Pacific Railroad.<sup>21</sup> Therefore, the proximity of the proposed project to the Southern Pacific Railroad and SR-86 represent a potentially significant contamination risk as accidents and derailments are not uncommon.

However, existing regulations require trains and trucks that are carrying hazardous materials to register the hazardous contents and display placards that identify the contents. This identification assists emergency response efforts in the event that an accident occurs during the routine transport of hazardous materials. Furthermore, transport, uses, and disposal of hazardous materials is regulated and monitored by multiple agencies. These agencies, including the United States Environmental Protection Agency (EPA), United States Department of Transportation (USDOT), the Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health Administration (Cal/OHSA), California Department of Toxic Substances Control (DTSC),

<sup>21</sup> City of Brawley. 2008. City of Brawley General Plan—Hazardous and Toxic Materials. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.

Caltrans, and California Highway Patrol (CHP), enforce federal and State mandatory regulations regarding transportation of hazardous materials and respond to hazardous material spills and releases that occur on roadways, railway lines, and at railroad crossings. Locally, the City and County's Development Code, the fire department regulations, and the State's occupational safety codes regulate the use, storage, and transport of hazardous materials within the area. Businesses handling hazardous materials are required to register with the local fire department and have appropriate SDS on-site to ensure emergency responders respond appropriately.

Moreover, implementation of MM HAZ-2 and MM HAZ-3 from the Certified EIR would ensure that railroad crossings must meet or exceed standards recommended by the California Supplement to the Manual on Uniform Traffic Control Devices (MUTCD) and that barriers would be erected between residential and recreation uses and the railway and pipelines. MM HAZ-2 and MM HAZ-3 from the Certified EIR would help to reduce the potential for accidents or derailments, reducing the chance of accidental contamination. Thus, adherence to mandatory federal, State, and local regulations and implementation of mitigation measures from the Certified EIR would reduce impacts to a less than significant level. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

**Summary of Certified EIR**

The Certified EIR concluded that impacts to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment were determined to be less than significant with mitigation incorporated. Hazardous materials can be transported by rail and could potentially travel through the project site. If a train derailed while carrying a toxic load, there could be adverse environmental consequences. Appropriate registration of contents and the display of appropriate placards are required for rail transportation just as they are for highway transportation. This identification assists in the emergency response efforts when accidents happen. Therefore, impacts were determined to be less than significant with mitigation incorporated.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less significant impact with mitigation incorporated.** As discussed above in Section (a), accidents involving hazardous materials could potentially occur during operation of the industrial uses and commercial uses included in the proposed project or as a result of a derailment or accidents on the Southern Pacific Railroad or SR-86. However, the transport, use, and disposal of hazardous materials is regulated and monitored by multiple agencies, which helps to prevent accidents and provides guidance to agencies on how to address the release of hazardous materials. Additionally, the proposed project would implement MM HAZ-2 and MM HAZ-3 from the Certified EIR, which would help to reduce the potential for accidents or derailments, reducing the chance of accidental contamination. Thus, adherence to mandatory federal, State, and local regulations and implementation of mitigation features from the Certified EIR would reduce impacts to a less than

significant level. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### **Summary of Certified EIR**

The Certified EIR concluded that there would be no impacts to schools from hazardous emissions. At the time of the EIR certification, no schools were located within a mile of the project site and the project did not propose to develop any new school sites. Therefore, no impact would occur.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact with mitigation incorporated.** The project site is not located within 0.25 mile of an existing school. However, the Rancho Los Lagos Specific Plan proposes two elementary schools located within the project site. This could result in the handling of hazardous substances within 0.25 mile of the proposed schools. However, the project design includes a strategic location of the proposed schools to comply with the requirements of the California Department of Education for siting of new schools. An underground petroleum pipeline runs parallel to and 50 feet west of the railroad tracks, bisecting the site. The State of California has established a 1,500-foot minimum setback from such pipelines to elementary schools. The schools proposed in the project site are outside this minimum setback. There are two off-site natural gas lines that run along Dogwood Road, with the closest proximity to an elementary school site of 3,000 feet. Both setbacks meet California Education requirements for setback from new school sites. Furthermore, as discussed in Section (a) and (b), the proposed project would comply with mandatory federal, State, and local regulations related to hazardous materials and implement MM HAZ-2 and MM HAZ-3 from the Certified EIR. Thus, impacts related to schools would be less than significant with mitigation incorporated. No additional analysis is required in the Supplemental EIR.

- d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

### **Summary of Certified EIR**

The Certified EIR concluded that no impact would occur from significant hazards as a result of being located on a hazardous material site. As part of the Phase I Environmental Site Assessment Rancho Los Lagos/Benson Project APN's 040-01303, 04 and 07 Brawley, California (2005), a records search of national environmental hazard databases was conducted. The search revealed the project site does not have a known "environmental condition" and would not create a significant hazard to the public. Therefore, no impact would occur.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** The project site is not located on the DTSC list of hazardous materials sites.<sup>22</sup> A Phase I Environmental Site Assessment (Phase I ESA) Report was prepared by GS Lyon in October 2022 for the Rancho Los Lagos Specific Plan Area (Appendix C).<sup>23</sup> The results of the Phase I ESA determined that there are no confirmed hazardous environmental spills or tanks on-site and did not reveal any Recognized Environmental Conditions (RECs) with the exception of probable historical use of bio-accumulative pesticides in the project site and adjacent properties due to the long history of agriculture. Pollution due to the prior repeated use of pesticides associated with farming and petroleum products associated with heavy farm equipment is possible. However, based on the testing performed by Geotechnics at similar agricultural sites in the Imperial Valley, Geotechnics concluded that the potential health risk posed by pesticide residues that may exist on-site is probably not significant. Regardless, further testing is required.

Additionally, lead-based paint (LBP) and asbestos-containing materials (ACM) were commonly used in construction prior to the late 1970s. Based on the pre-1980 construction of a residence formerly located within the project site, it is highly likely that LBP and ACM may exist at this site. Geotechnics concluded that due to the age of the residence, the presence of ACM and LBP is highly likely and would require mitigation prior to the renovation or demolition of the building.

Therefore, the proposed project would implement MM HAZ-1 from the Certified EIR, which requires soil sampling to determine whether unsafe concentrations of pesticides or petroleum products exist in the soil prior to ground-disturbing activities. Contamination, if found, is subject to existing federal, State, and local policies and procedures, requiring the delineation and remediation of sites containing hazardous substances to the satisfaction of the designated Local Enforcement Agency (LEA) and in accordance with the State of California Hazardous Substances Control Law; in this case, the County Public Health Department. If soil reuse is not feasible due to pesticide or petroleum product concentrations, proper disposal must occur subject to standard applicable laws and regulations. With implementation of mitigation features included in the Certified EIR, impacts would be reduced to a less than significant impact. No additional analysis is required in the Supplemental EIR.

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

## Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would result in no impact for people residing or working in the project area, due to safety hazards or excessive noise associated with an airport. The project site is not within the vicinity of a private airstrip. Therefore, no impact would occur.

<sup>22</sup> Department of Toxic Substances Control (DTSC). 2022. DTSC's Hazardous Waste and Substances Site List – Cortese List. Website: <https://dtsc.ca.gov/dtscs-cortese-list/>. Accessed November 14, 2022.

<sup>23</sup> City of Brawley. Rancho Los Lagos Specific Plan—Hazardous Materials (1-18). Website: <https://www.icpds.com/assets/planning/specific-plans/rancho-los-lagos/02-rancho-los-lagos-sp-introduction.pdf>. Accessed November 15, 2022.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The project site is located over 2.5 miles from a public airport or public use airport. The closest airport is Brawley Municipal Airport, which is located in the northern part of the City. Furthermore, the project site is not located within an area identified as a landing or take-off zone, or under an identified flight path of this airport, therefore it will not represent a significant hazard for people working or residing in the proposed project.<sup>24</sup> Furthermore, on March 31, 2009, the County Airport Land Use Commission determined that the proposed project was consistent with the Airport Land Use Compatibility Plan. Therefore, impacts associated with safety hazards or excessive noise levels within the project site would be less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR concluded that there would be no impacts related to the interference with an adopted emergency response plan or evacuation plan. There is no emergency response plan or emergency evacuation plan in the project area. Therefore, no impact would occur.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The City has designated several evacuation routes throughout the City to be used in case of catastrophic emergencies. The extent and severity of a disaster would determine which routes and which directions people must take in order to escape or avoid the afflicted areas.<sup>25</sup> According to the General Plan, the City's emergency evacuation routes are located on Dogwood Road, the eastern boundary of the project site, and SR-86, the western boundary of the project site. The proposed project includes one access point via Dogwood Road to the proposed Industrial Business Park and there is no access to the site via SR-86. Development of the proposed project would not change or inhibit access to Dogwood Road or SR-86. Both emergency evacuation routes would remain accessible with project development. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR concluded that there would be a less than significant impact with mitigation incorporated. The Specific Plan site is not within a wildlands area and would not have a significant risk of loss, injury, or death involving wildfires. However, fire flows and fire suppression equipment

<sup>24</sup> City of Brawley. 2008. City of Brawley General Plan—Aircraft Overflights. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.

<sup>25</sup> Ibid.

that protects structures must be adequate for emergency conditions. Inadequate fire flows or incompatible fire equipment are potentially significant impacts. MM HAZ-3 would ensure that fire flows would be adequate for the needs of emergency personnel. Therefore, impacts would be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** Potential fire hazards exist where water pressure is insufficient for firefighting, large areas of dry vegetation occur, and structural codes are not met. Several types of fire hazards occur in the City. The agricultural fields surrounding the urbanized area are burned regularly. An uncontrolled field fire could threaten adjacent structures. Brush is a fire hazard in some parts of the City. In addition, some of the older structures of the City may be susceptible to fires due to systems that fail to meet current codes, (e.g., heating system, electrical system, roofing materials).<sup>26</sup>

The proposed project includes a site for a fire station that would serve the proposed project site and surrounding community, as shown on Exhibit 3. To further reduce the risk of wildland fires, the proposed project would also implement MM HAZ-4 from the Certified EIR, which requires that the County Fire Chief review and approve the proposed project's fire suppression network before issuing construction permits. With a fire station, and implementation of mitigation measures, development would likely pose no significant risks involving wildland fires. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

## Mitigation Measures

To prevent potential safety hazards associated with existing features present and proposed to remain on or near the site, the following mitigation measures identified in the Certified EIR would reduce impacts to below a level of significance:

- MM HAZ-1** Prior to grading or export of soil, soil sampling shall be performed to determine whether unsafe concentrations of pesticides or petroleum products exist in the soil. If soil reuse is not feasible due to pesticide or petroleum product concentrations, proper disposal shall occur subject to standard applicable laws and regulations.
- MM HAZ-2** Railroad grade crossings shall be improved to match or exceed standards recommended by the California Supplement to the Manual on Uniform Traffic Control Devices (MUTCD).
- MM HAZ-3** Barrier fences or walls shall be erected in park, residential and recreational areas to prevent access to the railroad, pipeline, irrigation canals or drains from within the Specific Plan area.

<sup>26</sup> City of Brawley. 2008. City of Brawley General Plan – Fire. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 16, 2022

- MM HAZ-4** Fire flows and plumbing devices used for the fire suppression network must be reviewed and approved for compatibility and adequacy by the City Fire Chief before issuance of construction permits.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.10 Hydrology and Water Quality</b> <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

The Certified EIR concluded that impacts that would degrade surface or groundwater quality would be less than significant with mitigation incorporated. The Specific Plan project could result in short-



term adverse construction within the site that would expose ground surfaces and increase the potential for erosion and off-site transport of sediment in stormwater runoff. The use of heavy equipment, machinery, and other materials during construction could result in adverse water quality impacts if spills encounter stormwater, and polluted runoff enters downstream receiving waters. Construction activities involving more than 1 acre are required to obtain coverage and permit under the Statewide National Pollutant Discharge Elimination System (NPDES) for construction-related activities from the California State Water Resources Control Board (State Water Board). The permit requires the property owner/developer to prepare and implement a project-specific SWPPP, which includes Best Management Practices (BMPs) intended to reduce erosion, sedimentation, and not-permitted discharges during construction. The project proponent would develop and implement a SWPPP which demonstrates compliance with the State NPDES permit and provides protection of water quality during construction phases. Therefore, no significant impacts to water quality are expected as a result of construction activities.

Once developed, on-site stormwater flows will come into contact with developed surfaces that may contain pollutants. The primary potential sources for pollutants include streets, parking lots, lawns, and refuse storage areas. Common pollutant sources associated with development could include trash, food waste, petroleum products and detergents. Although the landscape palette would emphasize drought-tolerant plants, turf would be used on buffers, lawns, playgrounds and the golf course and would require the use of pesticides and fertilizers. Use is expected to be minimal and not pose a threat to water quality because impacts to water quality can be minimized by employing BMPs emphasizing good housekeeping measures and storage practices, which keep potential pollutant sources separated from stormwater. However, without the imposition of BMPs, these potential impacts are considered significant. Therefore, impacts were determined to be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** The proposed project could result in short-term adverse construction-related impacts to surface water quality. Grading during construction could expose ground surfaces and increase the potential for erosion and off-site transport of sediment in stormwater runoff. The use of heavy equipment, machinery, and other materials during construction could result in adverse water quality impacts if spills encounter stormwater, and polluted runoff enters downstream receiving waters. However, construction activities involving more than 1 acre are required to obtain coverage and permit under the Statewide NPDES for construction-related activities from the State Water Board. The permit requires the property owner/developer to prepare and implement a project-specific SWPPP, which includes BMPs intended to reduce erosion, sedimentation, and non-permitted discharges of materials during construction. This requirement is included as MM WR-1 from the Certified EIR. The BMPs to be used during construction typically include gravel bags, silt fencing, and general housekeeping measures to prevent stormwater contact with construction materials. The proposed project would also ensure that all on-site storm drain systems would be designed to the standards of the SWPPP, City, and the requirements of the RWQCB.<sup>27</sup> Additionally, per the requirement of MM WR-3 of the Certified EIR,

<sup>27</sup> City of Brawley. 2008. City of Brawley General Plan—Flooding. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 16, 2022.

the proposed project would install a water quality filtration unit at the discharge point with the IID Pearsol Drain prior to Phase A1 construction. Lastly, the project applicant would also be required to submit a Final Hydrology Study to focus in detail on street capacity and inlet drainage design to accompany each construction phase to ensure water quality is maintained, as required by MM WR-4 from the Certified EIR.

During operation of the proposed project, on-site stormwater flows will come into contact with developed surfaces that may contain pollutants. Additionally, pesticides and fertilizers may be used on the landscaping and recreational areas. However, use is expected to be minimal and not pose a threat to water quality because impacts will be minimized by the use of BMPs as outlined in MM WR-2 from the Certified EIR. Therefore, with the implementation of MM WR-1, MM WR-2, MM WR-3, and MM WR-4, impacts to water quality would be less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

**Summary of Certified EIR**

The Certified EIR concluded that there would be no impact to groundwater supplies or groundwater recharge. The project would not draft from any aquifer for its water supply. The project would be supplied by the overall public water supply, which is primarily Colorado River water. Reclaimed or raw water would be used on the landscaping to reduce the need for water treatment facilities. The County of Imperial has mandated the use of low-flow toilets and water-conserving fixtures on new development, and this would help conserve water resources. Therefore, no impact would occur.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The proposed project would not utilize groundwater for its water supply. The IID supplies water to the City for both domestic and agricultural purposes and uses primarily water from the Colorado River. The available water supply for Imperial County must be conserved to ensure that adequate amounts are available for planned development and continued agricultural production.<sup>28</sup> According to the Specific Plan, the project's total water demand (including Reclaimed/Raw and Treated Water) is estimated at 3,291,641 gallons per day. These estimates are significantly less than the amount of water that is needed for agricultural farming, which presently occupies the project site. According to the Certified EIR, water demand for the agricultural uses is estimated to be 1,971,773,216 gallons of water per year as farmland, which equates to 5,402,118.4 gallons per day. Therefore, the proposed project's estimated water demand is significantly lower than the existing uses. There is sufficient water available to serve the project. Additionally, reclaimed or raw water will be used on the landscaping to reduce the need for water treatment facilities.

Further, the City of Brawley's Water Conservation program provides a water conservation hotline, water-saving devices for residents, and monitoring for water wasters. According to the City's Urban

<sup>28</sup> City of Brawley. 2008. City of Brawley General Plan—Water Resources (RME-19). Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 16, 2022.

Water Management Plan, water wasting includes irrigation runoff, application of potable water to driveways and sidewalks, allowing water to escape from breaks, washing vehicles without a shutoff nozzle, and the use of decorative water features.<sup>29</sup> Additional water conservation policies that are part of the City's General Plan include requiring all new developments to install low-flow showers and toilets (RME Policy 4.1.3), protecting groundwater from sources of depletion and pollution (RME Policy 4.1.1), and requiring water conservation techniques and water-conserving appliances in new projects (RME 4.1.2). These water conservation efforts are comparable to the County of Imperial water conservation efforts that were analyzed in the Certified EIR. Therefore, the proposed project would not create a significant impact with regard to the region's water supply and there would be no impacts to groundwater. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- c) **Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**
  - (i) **result in substantial erosion or siltation on- or off-site;**

### Summary of Certified EIR

The Certified EIR concluded that impacts would be less than significant with mitigation incorporated. Grading and construction within the site would expose ground surfaces and increase the potential for erosion and off-site transport of sediment in stormwater runoff. Construction activities involving more than 1 acre are required to obtain coverage and permit under the Statewide NPDES for construction-related activities and from the State Water Board. In addition, the applicant must apply to obtain coverage under the Statewide NPDES permit for construction activities and develop and implement a SWPPP to control erosion and protect water quality during construction. The permit requires the property owner/developer to prepare and implement a project-specific SWPPP, which includes BMPs intended to reduce erosion, sedimentation, and non-permitted discharges during construction. Therefore, impacts were determined to be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** The proposed project site contains various phases of active cultivation and contains canals and drains. Development of the proposed project would convert existing farmland to nonagricultural use with developed surfaces and significant impervious areas. The proposed project would employ a combination of storm drains, detention facilities, and IID drains to accommodate stormwater runoff from the Specific Plan area. The proposed project's storm drain facilities would consist of a system of inlets and pipes, which are designed to handle general stormwater runoff from a 100-year, 24-hour storm event which is approximately 3 inches of precipitation. Stormwater would be piped to detention areas for drainage. The proposed drainage system would be designed to improve drainage on the site and to prevent

<sup>29</sup> City of Brawley. 2024. Environmental Compliance. Website: <https://www.brawley-ca.gov/es/departments/public-works/water-distribution>. Accessed May 21, 2024.

erosion or siltation, both on and off-site. The Drainage Plans and Hydrology Study prepared for the proposed project will be submitted along with the grading plan to the City for approval, as outlined in MM WR-4 from the Certified EIR. Further, the proposed project would comply with MM WR-2 from the Certified EIR, which provides BMPs to reduce erosion during project operation.

Additionally, as discussed above (a), grading and construction within the site could expose ground surfaces and increase the potential for erosion and off-site transport of sediment in stormwater runoff. The proposed project would be required to obtain an NPDES permit and develop a project-specific SWPPP, which includes BMPs intended to reduce erosion, sedimentation, and non-permitted discharges of materials during construction as outlined in MM WR-1 from the Certified EIR. With implementation of MM WR-1 MM WR-2, and MM WR-3, impacts related to substantial erosion or siltation would be less than significant. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR concluded that there would be a less than significant impact with mitigation incorporated. Stormwater runoff in the area of the Specific Plan is normally the responsibility of Imperial County Public Works Department and IID. Standard practice has been to use a combination of piping into the New River and discharge through a system of IID main and lateral drains. These drains, however, were designed for agricultural runoff and IID limits the amount of urban runoff into the drains so as to prevent downstream flooding and reduce impacts to water quality in the New River and the Salton Sea. To address these issues, the Specific Plan identifies a system of detention basins to control the amount of water discharged into the IID drains. Project drainage would manage stormwater flows generated on-site and intercept and convey off-site or through site flows. Therefore, impacts were determined to be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** As discussed above (c)(i), the proposed project would employ a combination of storm drains, detention facilities, and IID drains to accommodate stormwater runoff from the Specific Plan area. The storm drain facilities consist of a system of inlets and pipes, which are designed to handle general stormwater runoff from a 100-year, 24-hour storm event which is approximately 3 inches of precipitation. Stormwater will be piped to detention areas for drainage. The proposed drainage system would be designed to improve drainage on the site and would not result in flooding on-site or off-site. The Drainage Plans and Hydrology Study prepared for the proposed project will be submitted along with the grading plan to the City for approval, as outlined in MM WR-4 from the Certified EIR. Additionally, the proposed project includes open space areas within the community that also play a role in the project site's comprehensive site drainage, detention, and stormwater management system.<sup>30</sup> These open space areas also allow for better absorption and filtering of rainwater, thereby reducing pollution and the potential for

<sup>30</sup> City of Brawley. Rancho Los Lagos Specific Plan—Water Resources (RME-18). Website: <https://www.icpds.com/assets/planning/specific-plans/rancho-los-lagos/02-rancho-los-lagos-sp-introduction.pdf>. Accessed November 16, 2022.

localized flooding. Thus, with the implementation of MM WR-4 from the Certified EIR, impacts would be reduced to a less than significant level. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- (iii) **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;**

### Summary of Certified EIR

The Certified EIR concluded that impacts related to runoff water would be less than significant with mitigation incorporated. Once developed, the proposed improvements to the project site would alter the site from agricultural land and disturbed areas, to develop surfaces with significant impervious features. Post development pervious areas would include landscaped areas, parks, and water detention features. Altering the land from the current sections of pervious soils to large areas of impervious buildings, parking lot and driveways would increase the stormwater runoff on the project site and potentially create impacts to the existing stormwater drainage system. The potentially significant project-specific environmental effect has been eliminated or substantially lessened to a level that is less than significant through implementation of MM HWQ-4. Therefore, impacts would be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact with mitigation incorporated.** As previously discussed above (a) and (c)(i), the proposed project's Storm Drainage Master Plan employs a combination of storm drain piping, detention facilities, and IID drains to accommodate stormwater from the project site. The storm drain facilities, consisting of inlets and pipelines throughout the project site, are designed to handle general urban runoff of 3 inches of rain over the entire site within a 24-hour storm. The general urban runoff would be piped through the storm drain system, potentially into temporary detention facilities, and then into existing IID drains. The detention basins are sized to accommodate 100 percent of runoff produced in the project site during a 100-year/24-hour storm (assumed to be a total of 3 inches of rain). The detention basins would be required to drain all discharge into the IID drainage system within 72 hours of any given storm event.<sup>31</sup> Because of the inclusion of stormwater infrastructure in the proposed plans, project implementation would not create water runoff that would exceed the capacity of City drainage systems. The Drainage Plans and Hydrology Study prepared for the proposed project will be submitted along with the grading plan to the City for approval, as outlined in MM WR-4 from the Certified EIR. Impacts would be less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

<sup>31</sup> City of Brawley. Rancho Los Lagos Specific Plan—Storm Water Management. Website: <https://www.icpds.com/assets/planning/specific-plans/rancho-los-lagos/02-rancho-los-lagos-sp-introduction.pdf>. Accessed November 16, 2022.

(iv) impede or redirect flood flows?

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the Certified EIR was prepared. No conclusion was made in the Certified EIR regarding the significance related to the Specific Plan's potential to impede or redirect flood flows. However, the Certified EIR states that the Specific Plan would not place structures in such a way that they would impede or redirect flood flows. Additionally, there are no major levees or dams near the project site that would expose people or structures to significant risk of loss because of flooding from these sources.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** Federal Emergency Management Agency (FEMA) has developed maps depicting potential flood zones. Flood zones are geographic areas that FEMA has defined according to varying levels of flood risk. The project site and its surrounding area are designated as flood zone "C" and considered low to moderate risk for flooding. Potential shallow local flooding could occur in the event of an intense storm that overwhelms the on-site stormwater drainage system; however, this is not expected to result in major property loss or loss of life. The proposed project will not place structures in such a way that they would impede or redirect flood flows. Therefore, impacts related to flood flows are less than significant. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

### Summary of Certified EIR

The Certified EIR concluded that there would be no impacts related to flood hazards, tsunami, or seiche zones. The Specific Plan project is not near a large body of water that could potentially create seiches during seismic activity. The Pacific Ocean, which could produce tsunamis, is located too far from the project site to cause inundation due to such an event. The Specific Plan site and vicinity are relatively flat, without any steep canyons or ridges nearby. Because of this topography, the Specific Plan is unlikely to experience inundation by mudflow. Therefore, no impact would occur.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** As discussed above under (c)(iv), the project site and its surrounding area are designated as flood zone "C" and considered low to moderate risk for flooding. No significant flooding is expected to occur on-site. Additionally, there are no major levees or dams near the project site that would expose people or structures to significant risk of loss because of flooding from these sources. The proposed project is not near a large body of water that could potentially create seiches during seismic activity. The Pacific Ocean, which could produce tsunamis, is located too far from the project site to cause inundation due to such an event. The proposed project site and vicinity are relatively flat, without any steep canyons or ridges nearby. Because of this topography, the proposed project locale is not likely to experience inundation. Therefore, the proposed project would not introduce

new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

**Summary of Certified EIR**

No conclusion was made in the Certified EIR regarding the significance level of impacts related to conflicts or obstruction of the implementation of a water quality control plan. However, the Certified EIR stated that a WQMP for long-term operation was prepared for the Specific Plan. In addition, the applicant must apply to obtain coverage under the Statewide NPDES permit for construction activities and develop and implement a SWPPP to control erosion and protect water quality during the construction phase of the project.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The proposed project is designed to adhere to water quality conservation requirements and minimize water use. New development, including the proposed project, would be required to make maximum use of water conservation techniques, and the use of drought resistant plant species in ornamental landscaping would be encouraged. Implementation of the proposed project would use reclaimed water to irrigate landscaping and the golf course and would use low-flow household appliances. Residential water usage would be monitored on a per-unit basis, such that multi-family residential buildings, or mixed-use buildings, would have water use meters installed for each individual residence. These practices are aligned with the City's water quality control plan. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**Mitigation Measures**

The following mitigation measures identified in the Certified EIR would further document the construction SWPPP requirement and the types of measures required to protect stormwater flows during construction activities.

- MM WR-1** The developer shall obtain coverage under the Statewide NPDES permit for construction activities and develop and implement a SWPPP to protect water quality during construction activities. The SWPPP shall at a minimum address the following items:
- **Erosion control.** Measures shall be employed to prevent the movement of soil by wind or water during construction and may include watering, and physical barriers to the movement of soil particles.
  - **Tracking of Soil.** Measures shall be employed to effectively minimize the tracking of soil by vehicles and may include gravel driveways, wheel washes and street sweeping.

- **Wastes and Cleanup.** The SWPPP shall address washout, cleanup and disposal related to debris, trash, concrete, asphalt, paint, coatings, solvents and other materials applicable to preparation and construction at the project site.
- **Other Reasonable BMPs.** The SWPPP shall implement other BMPs as needed to keep pollutants away from stormwater. The SWPPP shall also identify additional applicable measures taken during the storm season and when storms are anticipated.

Only rainwater, uncontaminated irrigation runoff, natural and permitted discharges are permissible discharges for receiving waters. All other substances are considered pollutants and their entry into receiving waters must be minimized to provide for the beneficial use of those waters. The following measure shall be implemented in order to provide water quality protection upon operation of the proposed project.

**MM WR-2**

In order to minimize the potential for pollutants to enter receiving waters in stormwater runoff upon operation of the project, BMPs shall be implemented. The emphasis of the requirements in the BMP is to separate stormwater from potential pollutants.

- **Parking Lot and Roadway Cleaning.** Parking lots and internal roadways shall be routinely maintained to effectively minimize nuisances and to keep internal roads and parking lots in a safe condition. Cleaning should include vacuuming or sweeping of all parking lots, and internal roadways.
- **Parking Lot Runoff.** Parking lot drainage points shall be equipped with oil/water separators which shall be maintained according to the manufacturer's requirements for maintenance.
- **Sidewalks and Refuse Storage Areas.** All project sidewalks and refuse storage areas shall be routinely maintained and cleaned to effectively minimize nuisances. Refuse containers shall be sealed so that pollutants do not seep out of them.
- **Detention Basin.** The project detention basin shall be maintained with vegetation facilitating the absorption of pollutants.
- **Other Reasonable BMPs.** The owner/operator shall implement other good housekeeping and storage measures as needed to keep pollutants away from stormwater as outlined in the WQMP.

**MM WR-3**

Per EPA Phase II stormwater regulations and for water quality assurance, the project site shall install a water quality filtration unit at the discharge point with the IID Pearsol Drain prior to Phase A1 construction.

**MM WR-4**

The project applicant shall submit a Final Hydrology Study to focus in detail on street capacity and inlet drainage design to accompany each Phase and Tentative Map submitted for the project.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.11 Land Use and Planning</b> <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

- a) Physically divide an established community?

### Summary of Certified EIR

The Certified EIR concluded that the proposed Specific Plan project would not physically divide an established community, and thus no impact would occur. The project is in an area where Urban and Agricultural land interface. There is currently no established community there. The project area is located at the edge of an established community and would expand the community but not create a barrier to the flow of traffic, goods or services. The planned development would provide easy access to the golf course, community and neighborhood parks, trails, and lakes on-site. Therefore, there would be no impact.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** The project site is located in an area where urban and agricultural land interface. Currently, the project site is not developed with an existing community. In fact, implementation of the proposed project would expand the existing community in the City and improve the flow of traffic, goods, and services. Therefore, the proposed project would not physically divide an established community, and impacts would be less than significant. No additional analysis is required in the Supplemental EIR.

- 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?

### Summary of Certified EIR

The Certified EIR determined that the Specific Plan would be consistent with the Imperial County General Plan but would conflict with the City of Brawley General Plan. The Certified EIR concluded that conflicts between the Specific Plan and the plans and policies of jurisdictional agencies do not necessarily constitute significant environmental effects, and thus impacts would be less than

significant. A project's inconsistency with a plan or policy is only considered a significant environmental effect if the plan or policy in question was adopted for the purpose of preserving, protecting sensitive habitat, avoiding, or mitigating a physical environmental effect such as air quality, biological resources, water quality, etc.

The Specific Plan is consistent with all applicable Southern California Association of Governments (SCAG) policies. The Specific Plan does not conflict with Imperial County planning and development procedures and protocols. Goal 1 of the Agricultural Element encourages the preservation of all important farmlands. According to the California Department of Conservation, more than 90 percent of the site is located on Farmland of Statewide Importance and 9 percent is designated as Prime Farmland. Therefore, some important farmland would be converted. However, other objectives recognize the influence of urbanizing areas. The area is considered Urban with interim agricultural use occurring and is in the process of urbanizing. The project is consistent with Imperial County planning and development procedures and protocols because it only converts productive land that is located in an urban area.

Conflict exists with the City of Brawley General Plan, including the land use element and housing element. Additional conflict with the circulation and economic development elements is also possible. However, since the Specific Plan is consistent with goals and policies for the purpose of preserving, protecting sensitive habitat, avoiding, or mitigating physical environmental effects, impacts were determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The project site is within the City's SOI and shares the southerly boundary of the City limits. The northerly portion of the project site is designated as Agricultural in the City's 2008 General Plan Update, and A-1 in the Zoning Ordinance.<sup>32</sup> The project site is designated Urban Area and Rancho Los Lagos Specific Plan Area by the County General Plan and zoned as RLL-SPA-Res (Rancho Los Lagos Specific Plan Area) by the County.<sup>33</sup> Additionally, the project site also contains several easements, including easements associated with existing canals, drains, and electrical lines from the IID, which would be retained, vacated, or realigned as appropriate.

As part of the proposed project, the project site would be annexed to the City. The project site consists of two parcels: APN 040-130-010 is approximately 961 acres and is located west of the UPRR right-of-way. As part of annexation, this parcel would be annexed to the City and zoned to Specific Plan (SP) by the City. APN 040-130-012 is approximately 115 acres and is located east of the UPRR right-of-way. As part of annexation, this parcel would also be rezoned to SP. Development of the proposed project would be consistent with these designations.

LUE Policy 7.1.2 of the City's General Plan Land Use Element acknowledges that some agriculturally designated lands must be removed from production to accommodate City growth. This would be

<sup>32</sup> City of Brawley. 2017. City of Brawley General Plan—Official Zoning Map. June. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Brawley%20Zoning%20with%20SP%27s%20and%20MU%20-%20June%202017%20Update\(1\).pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Brawley%20Zoning%20with%20SP%27s%20and%20MU%20-%20June%202017%20Update(1).pdf). Accessed November 11, 2022.

<sup>33</sup> Imperial County. 2017. Imperial County Planning and Development Services—Zone 13 Zone Map. October. Website: <https://www.icpds.com/assets/planning/zone-maps/zone-13.pdf>. Accessed November 11, 2022.

particularly true for areas immediately adjacent to the City boundary, including the project site. Additionally, the County's General Plan Land Use Element designates the project site as an Urban Area, which allows the conversion of farmland. Therefore, the project does not conflict with the goals and policies of the General Plan or Specific Plan.

The Certified EIR, which was prepared under the authority of Imperial County, determined that there would be conflicts with the City of Brawley General Plan but that impacts would be less than significant. The proposed project would include several land use changes, such as reducing Low Density Single-family Housing by 9 acres and High Density Multi-family land uses by 20 acres. Additionally, the proposed project would add land uses for elementary schools and a fire station, as well as a resort hotel and spa. The total amount of land used for nonresidential uses would remain unchanged. The total number of dwelling units (3,830) and total number of acres used for residential land uses (540 acres) would remain unchanged. However, the total number of single-family residential units would be reduced by 27 units, and the total number of multi-family residential units would increase by 27 units.

Because of these proposed land use and housing changes, and because the City is responsible for discretionary project approvals, the proposed project could potentially introduce new impacts or create more severe impacts than those that were analyzed in the Certified EIR. It is anticipated that these impacts would not be significant. However, this issue will be analyzed in the Supplemental EIR to identify potential impacts along with any requisite mitigation.

## **Mitigation Measures**

No mitigation necessary.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.12 Mineral Resources</b> <i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

**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?**

### Summary of Certified EIR

The Certified EIR concluded that there would be no impact to mineral resources that would be of value to the region and residents of the State. The project site contains no known mineral resources that would be of value to the region. The site does not contain unique mineral or geothermal features. The California Department of Oil, Gas, and Geothermal Resources (CalGEM) has delineated an area approximately 3 miles north of the project area that does contain resources of regional and State importance, but the project would not affect that resource area. Therefore, the Certified EIR concluded that no impacts would occur.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** The proposed project site is currently operating under various phases of active agricultural cultivation. According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service, the proposed project site soil profile contains mostly silty clay soils with wet conditions. The site contains “non-fuel minerals” present such as clay minerals. However, the mineral resource would not be of value to the region. The Division of Mine Reclamation and California Department of Conservation have determined that there are no present mines or abandoned mines on-site. The closest mineral recovery site is approximately 3 miles north of the project site and contains resources of regional and State importance; however, the project would not affect that resource area.<sup>34</sup> Therefore, the proposed project would not introduce new environmental

<sup>34</sup> California Department of Conservation. 2016. California Department of Conservation—Mines Online. Website: <https://maps.conservation.ca.gov/mol/index.html>. Accessed November 11, 2022.

impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- 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?**

### **Summary of Certified EIR**

The Certified EIR concluded that there would be no impacts related to the loss of availability of a locally important mineral resource recovery site. There is no locally important mineral resource recovery site delineated in a local general plan, specific plan or other land use plan that coincides with the project area. The CalGEM has mapped and explored an area north of Brawley, approximately 3 miles from the project area. That area contains petroleum and geothermal energy that may be considered locally important; however, the project would not affect the availability of that resource. Therefore, no impact would occur.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

No impact. As discussed above under (a), implementation of the proposed project could result in the loss of availability of clay minerals; however, clay minerals are not considered a locally important mineral. There is no locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that coincides with the project site. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### **Mitigation Measures**

No mitigation necessary.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.13 Noise</b> <i>Would the project result in:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

The primary noise-related issues are the compatibility of the proposed project with respect to the guidelines set forth in the Noise Element of the General Plan, the potential for permanent increases in noise occurring as a result of the project, and temporary noise and vibration generated during construction. FCS shall prepare the Noise section using the previously prepared Noise Analysis and will identify impacts and mitigation, as appropriate. FCS shall provide the supporting technical data as an appendix to the Supplemental EIR.

Would the project result in:

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

### Summary of Certified EIR

The Certified EIR concluded that impacts relating to the generation of a substantial temporary or permanent increase in ambient noise levels would be less than significant with mitigation incorporated. Construction noise represents a short-term impact on ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. The peak noise level for most of the equipment that will be used during construction is 70 to 95 dBA at a distance of 50 feet. Noise levels at a further distance would be less. The nearest existing residential areas are assumed to be located a minimum of 840 feet to the northwest of the project site. Based on this distance, the nearest homes may experience

worst-case unmitigated peak construction noise levels between 75 and 80 dBA. The average noise levels are typically 5 to 15 dB lower than the peak noise levels. Average noise levels ( $L_{eq}$ ) at the nearest residences could be in the range of 60 to 75 dBA ( $L_{eq}$ ). Construction noise levels would not exceed the noise ordinance limit of 75 dBA ( $L_{eq}$ ) during daytime hours and would not result in a significant impact.

Increased traffic caused by the project will result in increased traffic noise levels along the roadways in the vicinity of the project site. The project is not expected to result in a substantial noise increase along SR-86. The project is projected to cause a maximum traffic noise level increase of 13.5 dB along Scharz Road east of Dogwood Road. This road segment lies east of the Rancho Los Lagos Project, and no existing homes are in this area. Other project-generated increases greater than 3 dB occur on Mead Road, representing the northerly border of the project site and along Dogwood Road, representing the easterly border of the project site. There are no existing homes in this area either. The closest noise-sensitive land use (the Imperial Valley Research Center) is located on SR-86 just north of the Specific Plan entrance. The noise level is projected to be only 1.2 dB. Therefore, the projected noise level increase along SR-86 will not have a significant impact on existing noise-sensitive land uses.

Ten Road segments are projected to have potential noise level increases of at least 3 dB above existing noise levels. Five of the segments lie along SR-86, one lies along Scharz Road, one lies along Mead Road, and three lie along Dogwood Road. Because of standard roadway setbacks and arrangement of land uses, there are no homes affected by the traffic noise increase in these areas. Furthermore, with the implementation of sound barriers at appropriate locations by other projects as they are developed, these potential cumulative noise increases will be similarly reduced to less than significant levels. Exterior areas along SR-86 and the railroad tracks would experience noise levels in excess of 65 Community Noise Equivalent Level (CNEL), unless protected by a noise barrier. Other areas in the project would generally experience traffic noise levels of less than 65 CNEL. Mitigation through the design and construction of a noise barrier is the most common way of alleviating traffic noise impacts.

A conceptual site plan has been developed for the project. The plan shows some uses that are potential noise generators, specifically the commercial planning area within the mixed-use area, the business park, and the commercial zone. There are three sources of noise usually associated with retail stores: loading dock noise, truck delivery noise, and mechanical equipment associated with heating, ventilation, and air conditioning systems. Noise levels could be loud enough that they would disturb residences. Noise generated by parking lot activities can also be a nuisance to local residents. The project site is subject to numerous exterior noise sources, and upon project buildout, would be surrounded by arterial roadways. The primary noise source that will impact the project site would be SR-86 and the railroad line. Without some form of mitigation, these residential areas would be exposed to adverse noise levels and impacts would occur. Therefore, impacts were determined to be less than significant with mitigation incorporated.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** Existing highways, roadways, and UPRR railroad could adversely affect noise receptors in the project site area. Implementation of the proposed project could result in

exposure of large numbers of people to existing noise sources. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

**Summary of Certified EIR**

The Certified EIR concluded that impacts resulting in the generation of groundborne vibration or noise levels would be less than significant with mitigation incorporated. Exterior areas along the railroad tracks would experience noise levels in excess of 65 CNEL unless protected by a noise barrier. Based on the current site plan, the worst-case proposed exterior living area could be as close as 215 feet from the centerline of the railroad tracks. At this location, the unmitigated noise level associated with train operations was estimated to be 67.9 CNEL. Mitigation through the design and construction of a noise barrier is the most common way of alleviating noise impacts. Therefore, impacts were determined to be less than significant with mitigation incorporated.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The project site's proximity to the railroad tracks has the potential to expose humans to excessive ground vibration and/or increased groundborne noise levels caused by passing trains. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

**Summary of Certified EIR**

The Certified EIR concluded that the Specific Plan would not expose the project area to excessive noise levels and therefore would have no impact. The Specific Plan is over 2.5 miles from the Brawley Regional Airport. Therefore, the Specific Plan was determined to have no impact.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**No impact.** The project site is located over 2.5 miles from a public airport or public use airport. The Brawley Municipal Airport is located in the northern part of the City. The airport is used mainly by small aircrafts and would not expose the project site to excessive noise levels.<sup>35</sup> Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**Mitigation Measures**

To be discussed in the Supplemental EIR.

<sup>35</sup> City of Brawley. 2008. City of Brawley General Plan—Aircraft Overflights. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.14 Population and Housing</b> <i>Would the project:</i>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

**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)?**

### Summary of Certified EIR

The Certified EIR concluded that there would be a less than significant impact related to substantial unplanned population growth. The Specific Plan represents 83 percent of the population increase and 63 percent of the housing increase in adopted growth projections. The project directly induces substantial population growth by constructing housing in excess of what was planned for in the regional forecasts and indirectly by extending infrastructure such as water and wastewater treatment, transmission lines, parks, schools and the fire station. If the County has not planned to serve these numbers, the project must include accommodations for infrastructure, public services, and utilities. Although the size and magnitude of the Specific Plan project would induce substantial population growth from social and economic effects of development in the near term (2010 through 2015), the project, with its proposed development in three phases will not produce buildout until after 2025 and will not induce population growth estimates beyond regional population forecasts for the long-term. Nevertheless, the Specific Plan intends to minimize potential overload to existing infrastructure by “identifying private source financing for on-site public and private improvement and Development Impact Fees” (Section 7.1 Public Facility Financing Phasing Plan). The use of private source financing would alleviate pressure on surrounding infrastructure in place by providing its own self-reliant infrastructure involving a fire department, two elementary schools, water, sewer and street improvements. Therefore, impacts were determined to be less than significant.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The project site is bounded by the City's southern boundary to the north and would annex to the City of Brawley as part of the proposed project. The proposed project establishes a total allowable maximum number of 3,830 dwelling units on approximately 540 acres, and would result in the development of several housing types including single-family, multi-family, active adult, and assisted living units. Therefore, the proposed project could result in up to approximately 13,444 new residents at project buildout.<sup>36,37</sup> While the project can be seen as a response to regional housing needs, it is also potentially growth inducing. Recognizing the projected long-term buildout of the proposed project site, the project can be seen as a response to regional housing needs, but it is also potentially growth inducing. Therefore, the proposed project plan could lead to unplanned population growth in the area. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### Summary of Certified EIR

The Certified EIR determined that there would be less than significant impacts relating to the displacement of substantial number of existing people or housing. There are no habitable structures on the project site so there is no potential for the project to displace existing housing or people. Therefore, it was determined that there would be no impact.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**No impact.** There are no existing structures or dwelling units on the proposed project site. Therefore, the proposed project plan would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The intended use of the proposed project site is to provide necessary housing for the City and its residents. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts with respect to the displacement of people or housing than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

## Mitigation Measures

To be discussed in the Supplemental EIR.

<sup>36</sup> United States Census Bureau. 2024. Quickfacts: Brawley city, California. Population and Households section. Website: <https://www.census.gov/quickfacts/fact/table/brawleycitycalifornia/PST045222>. Accessed January 3, 2024.

<sup>37</sup> Given that average household size in the City of Brawley is 3.51 and total buildout of the proposed project could result in up to 3,830 additional units, the calculation of total new residents as a result of the proposed project =  $3.51 \times 3,830$ .

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.15 Public Services</b> <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

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

a) Fire protection?

### Summary of Certified EIR

The Certified EIR concluded that there would be less than significant impacts to fire protection. The Imperial County Fire Department (ICFD) recommends creating an additional fire station and adequate staffing to serve the project vicinity, including other projects. Projects adjacent to the Rancho Los Lagos project site would share the cost of a new station, and developer impact fees collected from the Rancho Los Lagos project and other future development projects would contribute to this goal. In addition, the Fiscal Impact Analysis prepared for the Specific Plan indicated that an additional \$839,000 would be generated for the purpose of fire protection through a property tax levy. Therefore, the Certified EIR concluded that impacts were less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The City currently has two active fire stations that serve the public and surrounding area. Brawley Fire Department Station No. 1 is located at 815 Main Street, and Station No. 2 is located at 1505 Jones Street. Presently, the project site does not contain existing dwelling units or public facilities. The proposed project would include conventional residential areas and mixed-use developments and would result in an increased need for fire services. As previously discussed, the proposed project establishes a total allowable maximum number of 3,830 dwelling

units on approximately 540 acres; therefore, the proposed project could result in up to approximately 13,444 new residents at project buildout.<sup>38, 39</sup> This increased population in the area would result in an expanded service area for fire services. This could result in an increase in response times, or other performance objectives. However, the proposed project also provides a fire station that would serve the proposed project site and City. Estimated response times from the nearest City fire station to the furthest point in the Specific Plan area will be 9 to 12 minutes. The Brawley Fire Department considers this response time unacceptable for any structural fires and any medical emergencies. As such, a site for a fire station is reserved in the commercial/multi-family mixed-use area of the project site; however, the City would close Fire Station No. 1 in the future. With the inclusion of the proposed fire station, project implementation would likely pose a less than significant impact on fire protection response times. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

**b) Police protection?**

**Summary of Certified EIR**

The Certified EIR concluded that there would be less than significant impacts to police protection services. If the project is annexed by the City of Brawley, the project would be located in the Brawley Police Department (BPD) jurisdiction. The BPD participates in a mutual aid agreement with the County of Imperial and may be required to assist in some cases in the project area, even if the project is not annexed by the City.

Although the Sheriff's Office has adequate facilities and equipment, personnel shortages have impacted services and response times for the past several years. The Specific Plan would add to the manpower and equipment-related stress on an already impacted Patrol Division. The Imperial County Sheriff's Department (ICSO) expects to see an immediate increase in calls for theft of building materials and construction equipment due to this project, as this pattern of offenses is typical of the area. There would be an increase in reported crimes of all types proportional to population growth as a result of the project. Future development projects in the Specific Plan area would be required to pay Development Impact Fees for these services, as would other development projects identified in the vicinity. In addition, like impacts to fire services, the Fiscal Impact Analysis prepared for the Specific Plan indicated that an additional \$7,453,000 would be generated for the purpose of police services through property tax levy. Therefore, the Certified EIR concluded that impacts would be less than significant.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The BPD currently serves the City and is located at 351 Main Street (Appendix D). As discussed above under (a), the project site does not contain existing communities or dwelling units, but the proposed project would result in a maximum of 3,830 dwelling units and

<sup>38</sup> United States Census Bureau. 2024. Quickfacts: Brawley city, California. Population and Households section. Website: <https://www.census.gov/quickfacts/fact/table/brawleycitycalifornia/PST045222>. Accessed January 3, 2024.

<sup>39</sup> Given that average household size in the City of Brawley is 3.51 and total buildout of the proposed project could result in up to 3,830 additional units, the calculation of total new residents as a result of the proposed project =  $3.51 \times 3,830$ .

up to approximately 13,444 new residents at project buildout.<sup>40,41</sup> This increased population in the area would result in an expanded service area for police services. This could result in an increase in response times, increased volume of calls, or other performance objectives. As a result of the proposed project, the BPD anticipates the need for additional equipment, training, vehicles, and communication equipment, and the creation of a traffic enforcement unit, as well as additional police officers, school resource officers, support staff, dispatchers, and detectives.<sup>42</sup> This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

**c) Schools?**

**Summary of Certified EIR**

The Certified EIR concluded that there would be less than significant impacts to schools. The Specific Plan project area could potentially generate an estimated 3,728 K through 12 students upon buildout. Two elementary school sites, capable of supporting a capacity of 650 students per school, are proposed in the Specific Plan to serve the elementary school student population generated by the project's residential land uses.

The number of students generated by the project would necessitate at least two elementary schools and at a minimum, an expansion of the current junior high school site. The Specific Plan has two elementary sites and the potential location of a third, which would house the Kindergarten through 6th grade students residing in the project area. To house the additional 7th and 8th grade students, the School District would either have to expand the current junior high school (requiring acquisition of additional property at its present location and the relocation of the Districts' Office, warehouse, bus yard, Special Education Office, and Community Learning Center to another site) or require the building of a new facility. During the project's development, Brawley Elementary School District would identify elementary school sites for future purchase and development, concurrently with the project's contribution of Senate Bill (SB) 50 Development Impact Fees. Brawley Elementary School District has indicated that the project, in addition to SB 50 protocol, would also require a School Facilities Analysis (Level 2 Study) to be conducted. This analysis would calculate the current set fee based on the project's accessible space of residential construction proposed. Therefore, with the project's fulfillment of Brawley Elementary School District Development Impact Fee requirements, impacts to elementary school services were determined to be less than significant.

A new high school would need to be built to accommodate the increase in student enrollment associated with new development in the area, including residential development contributed by the Specific Plan project. Brawley Union High School District (BUHSD) is considering a location for a new high school, but a timeline is not currently in place. Potentially adverse impacts to the BUHSD could be experienced in the areas of student transportation and student over-enrollment until a new high school can be built. Alleviating this impact through Development Impact Fees collected from SB 50

<sup>40</sup> United States Census Bureau. 2024. Quickfacts: Brawley city, California. Population and Households section. Website: <https://www.census.gov/quickfacts/fact/table/brawleycitycalifornia/PST045222>. Accessed January 3, 2024.

<sup>41</sup> Given that average household size in the City of Brawley is 3.51 and total buildout of the proposed project could result in up to 3,830 additional units, the calculation of total new residents as a result of the proposed project =  $3.51 \times 3,830$ .

<sup>42</sup> Duran, Jimmy M. Chief of Police. Personal correspondence: email. December 6, 2022.

protocol would financially assist the funded construction of a new high school within the district. The project's fulfillment of BUHSD's Development Impact Fee requirements would reduce the level of impact to high school services to less than significant. Therefore, impacts relating to schools were determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The City of Brawley Educational System consists of three main school districts: Brawley Elementary School District, BUHSD, and Public Higher Education. The Brawley Elementary School District serves approximately 3,830 students, grades K-8, with a current capacity of 4,006 (Appendix D). The BUHSD serves grades 9-12.

The proposed plan includes two schools, including a public elementary school and a private elementary school within the site. Because of the residential component of the project, development would generate an estimated 2,417 students upon buildout, of which 1,182 would be K-8 students. This would create an increased demand for school services.<sup>43</sup> Two elementary school sites are capable of supporting approximately a capacity of 650 students per school to serve the student population generated by the residential land uses. However, no middle or high schools would be developed, potentially causing a significant impact on middle and high school service ratios. The proposed project would be required to pay the applicable Development Impact Fees. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

#### **d) Parks?**

### **Summary of Certified EIR**

The Certified EIR concluded that impacts to parks would be less than significant. All public services provided by the County Public Works Department such as work on roads, parks, etc., would be initially provided by the developer of the Specific Plan project as the project's components are built out. As part of the Specific Plan, responsibility for the community park, lake, and other amenities would be the responsibility of a County Service Area (CSA) to be set up prior to development of the site. Therefore, the Certified EIR concluded that impacts would be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The proposed project site is an active agricultural operation and does not contain any parks. The proposed project would include a residential community where parks are available to residents. Design features of the proposed project exceed the mandatory open space and park requirements for new development in the City (Appendix D). The project would include a golf course, public parks, and other open space areas available for future residents. As discussed in greater detail in Section 2.16, Recreation, construction of the proposed project plan would add additional parks for City residents and would not result in substantial adverse physical impacts on existing parks on the proposed project site. Therefore, the proposed project would not introduce

---

<sup>43</sup> Fox, Rauna. Superintendent, Brawley Elementary School District. Personal Correspondence: email. March 2, 2023.

new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**e) Other public facilities?**

**Summary of Certified EIR**

The Certified EIR concluded that impacts to other public facilities were less than significant. Library use is anticipated to increase as residential population grows. The closest Imperial County Free Library branch is approximately 10 miles from the project site, which is likely to be too far for most residents to travel to use the library. A more likely scenario would be that library patrons would utilize the Brawley Public Library. The Brawley Public Library is the closest library to the project, and patronage of the library would increase as a result. A new library branch recently opened about 2 miles from the project area on the grounds of the Imperial County office of Education Del Rio School. This facility would accommodate the residents of the Specific Plan project area but would not be adequate to serve the future needs of residents in the City of Brawley. It is unlikely that the new Brawley Public Library facility has the capacity to accommodate future project residents, and residents of future projects. The nearest County Free Library is 10 miles away. Therefore, impacts would be significant and new library would be required. A new library could be accommodated within the Rancho Los Lagos Mixed-Use Center. The County imposed a Development Impact Fee for libraries and the Specific Plan project would generate approximately \$1.5 million in library impact fees. Therefore, between the payment of Development Impact Fees and the siting of a new library, impacts to libraries were determined to be less than significant.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Pioneers Memorial Hospital, a 107-bed acute care facility, is located just northwest of the project site. Ambulatory access to the hospital is adjacent to the project site, along State Route 86. Hospital facilities may be impacted by project implementation.

Residents of the proposed project would be served by the Brawley Public Library. The Brawley Public Library is located at 400 Main Street, 2.1 miles north of the project site. This facility serves the entire population of the City. Facilities at this branch include 59,637 books and currently include three full-time and five part-time employees. None of the City's standards for library facilities and required staffing levels are currently being met. Through the year 2030, the City's future demand for library facilities includes an additional 5,514 square feet of public library space, 2,979 square feet of literacy space, and 4,468 square feet of computer center space. With the expansion from 56,832 to 126,054 books, the City will meet its population-based standard of two volumes per capita by 2030. A total of 21 additional full-time staff will be needed by the year 2030.<sup>44</sup> The proposed project would increase demand for computer stations, Wi-Fi connectivity, and circulation materials such as books, audiobooks, and eBooks (Appendix D). The demand would require the library to increase materials by at least 200 percent.<sup>45</sup> As such, library facilities would be impacted by project implementation.

<sup>44</sup> City of Brawley. 2018. Final Service Area Plan. August. Website: <https://www.iclafco.com/assets/2018-city-of-brawley-sap.pdf>. Accessed May 22, 2024.

<sup>45</sup> Petra Ortega, Library Manager. Personal correspondence: email. December 6, 2022.

This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

## **Mitigation Measures**

To be discussed in the Supplemental EIR.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.16 Recreation</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

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

### Summary of Certified EIR

The Certified EIR concluded that impacts related to the substantial physical deterioration of a facility due to the increase in use of existing facilities would be less than significant with mitigation incorporated. The project would generate new residents who would use regional recreational facilities. As Brawley is a small city with exceptional recreational programs, potentially significant impacts to Brawley's recreational programs could occur as a result of the Specific Plan if adequate programs are not provided on-site or by the County. The demand for programs could cause a need for Brawley to expand its facilities, or risk lowering the outstanding service standard it provides to its residents. The County may need to expand its public programs to prevent overcrowding of City of Brawley facilities. Without proper mitigation to regulate activities, impacts to recreational resources would remain potentially significant. The implementation of MM R-1 and MM R-2 would reduce impacts to recreational resources and the demand for recreational programs to less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** The City of Brawley Parks and Recreation provides the residents of Brawley with quality parks and recreational facilities. As previously discussed, the proposed project would develop a golf course, public parks, and other open space areas available for future residents. These design elements would exceed the mandatory open space and park requirements for new development in the City. The construction of the proposed project plan would add additional parks for City residents and would not result in an increased use of existing neighborhood and regional parks. There would be no substantial physical deterioration of existing parks or recreational facilities.

The City requires the provision of 10 acres of parkland for every 1,000 residents, and at least half of this space, or 5 acres per 1,000 persons, must be local park and recreational areas.<sup>46</sup> The proposed project would provide 65.6 acres of public community and neighborhood parks, 4.9 acres of mini parks, and a 139-acre executive golf course, for a total of 282.9 acres. Because the proposed project's 13,444 new residents at project buildout would necessitate the provision of 134.44 acres of parkland. Therefore, the proposed project would exceed the required park standards. The proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

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

**Summary of Certified EIR**

The Certified EIR concluded that impacts relating to the construction or expansion of recreational facilities would be less than significant. The project includes a golf course, and its construction could have an adverse physical effect on biological and paleontological resources. However, impacts would be limited to the construction phases, and the overall impact is considered less than significant. No additional recreational facilities would be required because of the Specific Plan project. Therefore, impacts would be less than significant.

**Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** As discussed above (a), the proposed project would develop a golf course, public parks, and other open space. The City's overall park standard is to provide 5 acres of developed parkland per 1,000 residents. These design elements would exceed the mandatory open space and park requirements for new development in the City. The recreational facilities that are being developed would be located within the project site boundaries and not off-site. No additional recreational facilities would be required after project construction. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

**Mitigation Measures**

No mitigation necessary.

<sup>46</sup> Fonseca, Rachel. City of Brawley Parks and Recreation Manager. Personal correspondence, email. December 5, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.17 Transportation</b> <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would have a less than significant impact and would not conflict with a program plan, ordinance, or policy addressing the circulation system. One of SCAG's strategic plan projects is to expand the rapid transit corridors between population centers in Southern California, and the council plans to link Imperial County with the system. As SCAG continues into the implementation phase of the transportation plans, negotiations are underway for land acquisition. However, the Specific Plan is not in an area that would affect acquisition of lands for SCAG's regional rapid transit plans.

The County has a bicycle master plan and has incorporated its bike paths into the existing and planned circulation network. Road construction and improvements associated with the Specific Plan will further accommodate bicycle and pedestrian traffic. There are currently no bus turnouts or bike racks in the plan area, but they will be required with subsequent development. Railroad crossing improvement and signalized intersections are design features of the project that will improve traffic safety. Therefore, impacts were determined to be less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** A technical traffic study and corresponding report would be required to determine potential traffic-related impacts as a result of project implementation. This issue will be

analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the previous EIR was prepared. No conclusion was made in the previous EIR regarding the significance level of impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b).

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** A technical traffic study and corresponding report would be required to determine potential traffic-related impacts as a result of project implementation. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR concluded that there would be a less than significant impact from the project regarding design hazards and incompatible uses. The non-linear interior street design was intentionally designed to lower driving speeds without causing unnecessary delays. In the near term, State roads would separate the project from adjacent agricultural uses to the east and west, so farm equipment would not be a major hazard. There are rules regulating the movement of farm equipment on State roads. In the long-term, infill development will further separate agricultural and urban land uses. Therefore, impacts were determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** This information is not fully known at present. A technical traffic study and corresponding report would be required to determine potential traffic-related impacts as a result of project implementation. Additionally, the City Department of Public Works will address civil engineering design safety issues by coordinating the development of project design features and enforcing conditions of approval. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- d) Result in inadequate emergency access?**

### **Summary of Certified EIR**

The Certified EIR concluded that there would be less than significant impact on emergency access. There are several ingress/egress points into the Specific Plan area and therefore there are options for alternate emergency routes. County road design requirements provide adequate space for the

passage of emergency vehicles based on the road classification width. Therefore, the Specific Plan would have a less than significant impact on emergency access.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Less than significant impact.** The City has designated several emergency routes through Brawley to be used in case of catastrophic events. Emergency access to the project site would be SR-86, Dogwood Road, and Scharz Road. Project implementation would not change or inhibit access to Dogwood Road or SR-86. The proposed project and its associated developments would not impede emergency access. Adequate and lawful ingress and egress are provided on-site. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### **Mitigation Measures**

To be discussed in the Supplemental EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.18 Utilities and Service Systems</b> <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

The Certified EIR concluded that impacts related to the relocation or construction of new expanded water, wastewater treatment, electric power, natural gas, or telecommunication facilities would be less than significant.

The Certified EIR anticipated that future public services would be provided and governed under the Keystone CSA with its proposed WTP. Therefore, the Certified EIR concluded that an additional WTP would not be constructed and that no impact would occur.

While there are power lines along the project's northern and eastern boundary, electrical supply is currently limited in the area. In response to the need for an additional power substation, the Specific Plan includes provisions for a site to accommodate the substation, and appropriate easements for utility power lines. Therefore, there would be no adverse impact regarding electrical supply to the project.

According to the Specific Plan, natural gas is to be provided to the Rancho Los Lagos Specific Plan Area by the Southern California Gas Company (SoCalGas). SoCalGas stated in a letter that they believe they can supply the Specific Plan area with natural gas service, but delivery of natural gas service to individual projects within the plan area would be reviewed by SoCalGas at the time the projects are proposed. Therefore, because there is gas infrastructure available for lateral service and the utility provider has indicated they would serve the project, there would be no adverse impact regarding natural gas utilities as a result of the project.

Telephone services provided by AT&T and television cable services provided by Time Warner Communications would be provided throughout the community with individual connections made based on paid utilization. Although new lateral wires and cables would be required to provide residential, commercial, and industrial hookups, these private utility companies are equipped and willing to expand their services to the project area. Therefore, there would be no adverse impact regarding the provision of telecommunication services to the project area.

## **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Future development resulting from the implementation of the proposed project could result in potential significant impacts related to construction of new utilities and service systems facilities (see below). This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

### ***Electrical***

The proposed project would construct a new IID electrical substation east of the UPRR in the Industrial Business Park area of the site. This substation would provide power for the entire project site. Service lines would be extended to each residence and business.

### ***Stormwater Drainage***

Urban stormwater runoff in the project site would be diverted to the existing IID stormwater drainage system. The proposed project's Storm Drainage Master Plan employs a combination of storm drain piping, detention facilities, and IID drains to accommodate stormwater from the project site. The general urban runoff would be piped through the storm drain system, potentially into temporary detention facilities, and then into existing IID drains.

### ***Natural Gas***

Natural gas lines and a petroleum pipeline are present on the proposed project site. Two natural gas lines run along Dogwood Road. These pipes parallel the Dogwood Road centerline and are separated from each other by approximately 16 feet. These pipes provide the closest gas conduits to the

proposed project site. An additional underground petroleum pipeline runs parallel to the Southern Pacific Railroad, approximately 50 feet west of the tracks.

### **Water and Wastewater Treatment**

The City's WTP has a current treatment capacity of 15 million gallons per day (MGD) and has adequate space to allow for an expansion of an additional 15 MGD at this facility. Peak water demand in Brawley during the summer is currently about 11.8 MGD. Therefore, the WTP is currently operating below capacity. The City would continue to monitor storage capacity to ensure that future peak summer water demand can be met.<sup>47</sup>

The City entered a Memorandum of Understanding (MOU) to develop water and wastewater treatment facilities for the area. As part of that effort, planning is underway to develop two WTPs, one each to be located in the northern and southern portions of the planning area. These plants would be owned and operated by the City and would provide treated water to the project site.<sup>48</sup>

### **Solid Waste**

The City is currently served by Allied Waste Management Services, a privately owned company that transports solid waste from residences and businesses to the Allied Imperial Landfill. The Imperial Landfill is a Class III non-hazardous solid waste landfill that opened in January 2000 along East Robinson Road in unincorporated land on the eastern outskirts of the City of Imperial, approximately 8 miles northeast of the City. Currently, the landfill is approaching full capacity, and the owner/operator has prepared a Landfill Plan for the site that includes development of a new cell to provide additional landfill space. The proposed Landfill Plan would extend the facility's life from the remaining three to five years to approximately 30 years in order to meet the current and future waste disposal needs of Imperial County.<sup>49</sup>

This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR concluded that impacts to water services would be less than significant. Rancho Los Lagos is projected to use 2,266.141 gallons of potable water per day. The links between IID provided water and consumers like farmers, municipalities and industrial users are symbiotic and historical. Based on project populations calculated from data provided by Imperial County General Plan, and agricultural consumption provided in IID's 2006 annual report, estimated water demands have been calculated through 2028. IID's present perfected contract water rights are highly unlikely to be

<sup>47</sup> City of Brawley. 2008. City of Brawley General Plan—Water (IE-29). Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.

<sup>48</sup> City of Brawley. Rancho Los Lagos Specific Plan. Website: <https://www.icpds.com/assets/planning/specific-plans/rancho-los-lagos/02-rancho-los-lagos-sp-introduction.pdf>. Accessed November 16, 2022.

<sup>49</sup> City of Brawley. 2008. City of Brawley General Plan—Solid Waste/Recycling. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.



affected by the usual State and regional drought conditions. The water of the Colorado River is used by both the Upper Basin States and the lower basin states. Assuming drought conditions on the Colorado River, California's 4.4 million acre-feet water appointment is not likely to be impacted due to massive storage quantities in the Colorado River reservoir system and the structure of water priorities. IID holds legal titles to all its water and water rights in trust for landowners within the service area. IID's Colorado River water supply is consistent and reliable. Therefore, the project's impact to water services was determined to be less than significant.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** The project site experiences an arid, desert climate with annual precipitation of about 2.6 inches and can be highly variable. The site contains canals and drains that are used to transport water to and from the agricultural resources located on-site. The available water supply for the area must be conserved to ensure that adequate amounts are available for planned development and continued agricultural production.

Several options exist for providing water service to the proposed project site. The City would provide water to the project site. Additionally, the proposed project would draw raw water from the Central Main and Lavender Canals for irrigation of future landscaping and the golf course, particularly if no reclaimed water is available. As previously discussed, the total water demand (including Reclaimed/Raw and Treated Water) is estimated at 3,291,641 gallons per day. There is sufficient water available to serve the project, however, inadequate water supply may exist during multiple dry years. Future development resulting from the implementation of the proposed project could result in potential significant impacts related to sufficient water supplies to serve the project. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR concluded that there would be no impact relating to a lack of adequate wastewater treatment facilities and services. Since the Specific Plan planned for an alternative means of providing wastewater treatment services and facilities on-site, an adequate capacity to service the project's demand has been assured. Therefore, the Certified EIR concluded that there would be no impacts.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**No impact.** According to the Specific Plan, the proposed project site is expected to generate a daily wastewater treatment demand of approximately 853,241 gallons at buildout. Similar to potable water options, the Specific Plan proposes that sewer service be provided to the project site by the City. A wastewater treatment facility would be built in the southwestern corner of the industrial section of the project site and would be turned over to the City. These plants would be owned and operated by the City but would provide treated water to the proposed project. The applicant is

proposing that domestic water be provided to the proposed project. With the development of the wastewater treatment facility, the proposed project would have an adequate capacity to serve the project's demand for wastewater treatment. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

- 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?**

### Summary of Certified EIR

The Certified EIR concluded that there would be a less than significant impact with regard to generating solid waste in excess of State or local standards, or of the capacity of local infrastructure. The project is served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Allied Waste Services is the waste disposal service provider. They estimated that the remaining life of the Allied Imperial Landfill that would serve the project area was approximately 10 years at the time the Certified EIR was prepared. A landfill expansion is planned that would add 60 acres to the landfill and would provide up to 30 years of additional capacity.

The Imperial Valley Waste Management Task Force (IVWMTF), operated by the County of Imperial, provides information and recycling locations to Plan area residents for the disposal of household hazardous wastes, automobile tires, and other items not recyclable in curbside recycling containers. Through participation in the IVWMTF programs, the project would comply with federal, State, and local statutes and regulations related to solid waste. Therefore, impacts were determined to be less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** According to the City of Brawley General Plan, in 1989, the State comprehensively revised its approach to solid waste management and established the goal of reducing the State's production of solid waste by 25 percent by 1995 and 50 percent by 2000. The California Integrated Waste Management Act of 1989 codified this approach.<sup>50</sup> As development continues in the City, more solid waste is generated. The increased amounts of solid waste would require expansion of the City's solid waste collection service and would accelerate the closure of the local landfill.<sup>51</sup>

The Specific Plan establishes a total allowable maximum number of 3,758 dwelling units on approximately 540 acres and would result in the development of several housing types. In addition to residential areas, the proposed project would include a variety of land use types, thus resulting in an increase in solid waste generation. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

<sup>50</sup> City of Brawley. 2008. City of Brawley General Plan—Solid Waste/Recycling. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.

<sup>51</sup> City of Brawley. 2008. City of Brawley General Plan—Solid Waste/Recycling. Website: [https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final\\_GP\\_Master-PDF.pdf](https://www.brawley-ca.gov/cms/kcfinder/upload/files/planning/Final_GP_Master-PDF.pdf). Accessed November 14, 2022.

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

### Summary of Certified EIR

The Certified EIR concluded that the Specific Plan would comply with federal, State, and local management and reduction statutes related to solid waste and thus have a less than significant impact. Through participation in the IVWMTF programs, the project would comply with federal, State, and local statutes and regulations. Therefore, impacts were determined to be less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Less than significant impact.** Enforcement of federal, State, and local laws and regulations within the jurisdiction of Imperial County and the City are intended to protect public health safety and the environment by ensuring safe and proper solid waste management practices. State law (Public Resources Code) requires every local jurisdiction to designate a solid waste LEA, which is certified by the California Department of Resources Recycling and Recovery (CalRecycle), to enforce federal and State laws and regulations for safe and proper handling of solid waste.<sup>52</sup>

Responsibilities of the LEA include accepting and processing all new and revised solid waste facility permits, issuing permits, and conducting regular inspections of permitted facilities. Along with inspecting solid waste landfills, the LEA conducts inspections on transfer/processing facilities and operations, construction and demolition sites, and composting operations. The LEA also inspects, and monitors closed, illegal, inactive, and abandoned solid waste disposal sites, responds to complaints of illegal disposal of solid waste and conducts waste hauler inspections.<sup>53</sup> With compliance of local LEA regulations, safe and proper handling of solid waste occur. Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts than those analyzed in the Certified EIR. No additional analysis is required in the Supplemental EIR.

### Mitigation Measures

To be discussed in the Supplemental EIR.

<sup>52</sup> Imperial County Health Department. 2022. Environmental Health—Solid Waste. Website: <https://www.icphd.org/environmental-health/solid-waste/>. Accessed November 14, 2022.

<sup>53</sup> Ibid.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.19 Wildfire</b> <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project:**

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

### Summary of Certified EIR

No conclusion was made in the Certified EIR regarding the significance level of impacts relating to the impairment of an adopted emergency response plan. However, the Certified EIR stated in section 4.7-4 that there would be no impact to an emergency response plan or emergency evacuation plans. There is no emergency response plan or emergency evacuation plan in effect in the project area. Therefore, the Certified EIR did not identify any significant impact.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The City of Brawley General Plan contains multiple emergency evacuation routes, including SR-86 and Dogwood Road. In case of an emergency, there are six other evacuation routes to take to exit the area. The construction of the proposed project plans would not substantially impair the City's adopted emergency evacuation plan. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- 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?

### Summary of Certified EIR

No conclusion was made in the Certified EIR regarding the significance level of impacts relating pollutant concentration exposure or the uncontrolled spread of a wildfire. However, the Certified EIR stated that the project area is bounded by County roads, irrigation canals and agricultural lands that are actively farmed. The Specific Plan site is not within a wildlands area and would not have a significant risk of loss, injury, or death involving wildland fires. Therefore, based on the information provided in the Certified EIR, impacts were less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** According to CAL FIRE's Fire Hazard *Severity Zones Map*, the site is a Local Responsibility Area (LRA) but is not considered to be in a Fire Hazard Severity Zone (FHSZ). The project site consists of generally flat terrain with very gentle topography sloping downward toward the southeast. The proposed project site experiences an arid, desert climate with little precipitation. The site is bounded by and contains canals and drains on-site with no dwelling units. There are no factors that would exacerbate wildfire risks at the proposed project site. Additionally, the proposed project would develop existing agricultural operations and vegetation, thus reducing the likelihood of an uncontrolled wildfire. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- 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?

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the previous EIR was prepared. No conclusion was made in the Certified EIR regarding the significance level of impacts relating pollutant concentration exposure or the uncontrolled spread of a wildfire. However, the Certified EIR stated that the project would result in the construction of a system of roads, transmission lines, and two WTPs. These additional installations would not exacerbate fire risk or ongoing impacts to the environment. Therefore, based on the available information from the Certified EIR, impacts were less than significant.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** The construction of the proposed project plan would require installation of roads, emergency water resources, power lines, mixed-use and residential buildings. The proposed project would include the development of a new fire station on-site. These additional installations would not exacerbate fire risk or ongoing impacts to the environment. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- 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?

### Summary of Certified EIR

This checklist question was not included in the Certified EIR because this checklist question did not exist at the time the Certified EIR was prepared. No conclusion was made in the Certified EIR regarding the significance level of impacts relating to significant risks as a result of runoff, post-fire slope instability, or drainage changes. However, the Certified EIR stated that the project site is essentially flat and does not contain a steep downslope.

### Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** As discussed above (b), the project site is an LRA but is not considered to be in a FHSZ. The proposed project site does not contain a steep downslope that would result in damage to people or structures due to downslope risks. This issue will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

### Mitigation Measures

No mitigation necessary.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.20 Mandatory Findings of Significance</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

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

### Summary of Certified EIR

The Certified EIR concluded that impacts to special-status species would be less than significant with mitigation incorporated. Additionally, impacts to riparian habitat and other sensitive natural communities, as well as federally protected wetlands, were found to be less than significant with mitigation incorporated. Furthermore, impacts to the movement of native resident or migratory species were found to be less than significant with mitigation incorporated. Because of the potential impacts, the Certified EIR included mitigation measures addressing avoidance of threatened, endangered, or protected species during construction; preparation of a wetland delineation; consultation with the USACE, RWQCB, and CDFW; permitting; nesting surveys; permanent protection of foraging habitat for burrowing owls; replacement burrows and relocation; and long-term maintenance of open space areas.

With implementation of mitigation measures for biological resources, the Certified EIR determined that the Specific Plan would not substantially degrade the quality of the environment, reduce fish or wildlife habitat, reduce fish or wildlife populations below self-sustaining levels, eliminate a plant or animal community, or reduce the number or range of a rare or endangered plant or animal.

The Certified EIR determined that impacts related to California history or prehistory would be less than significant with mitigation incorporated. Because of the possibility of buried prehistoric deposits associated with ancient lakeshores, the Certified EIR included MM CR-1 and MM CR-2, which would provide monitoring of the project, reducing impacts to buried prehistoric deposits associated with ancient lakeshores to a level of less than significant. Additionally, there are no known archaeological resources on the project site. Additionally, there is a low potential that subsurface construction activities, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. The Certified EIR determined that, with compliance with California Health and Safety Code 7050.5-7055 and Public Resources Code Section 5097.98, and subdivision (k) of Section 5097.94, impacts would be less than significant with mitigation incorporated.

Based on compliance with required guidelines and statutes and implementation of the mitigation measures outlined above, the Certified EIR found that the Specific Plan would not 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. Therefore, the Certified EIR determined that impacts would be less than significant with mitigation incorporated.

## **Rancho Los Lagos Specific Plan Analysis and Conclusions**

### **Potentially significant impact. .**

Issues related to Biology and California history or prehistory will be analyzed in the Cultural Resources and Tribal Cultural Resources sections of the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

### **Summary of Certified EIR**

The Certified EIR concluded that cumulative impacts would be less than significant with mitigation incorporated. Planned growth in the Imperial Valley is considerable, and the Specific Plan represents approximately 10 percent of the growth identified by SCAG for the unincorporated Imperial County area. Development expansion would continue to transform rural, open space, and agricultural uses to a mixed-use suburban residential communities as allowed by the County in establishing the A2-U zoning. While this is a fundamental change to the historical land uses and use patterns of the area,



this change would not be cumulatively significant as long as development complies with local land use and planning standards and development occurs in the Urban Areas designated by the County.

### **Rancho Los Lagos Specific Plan Analysis and Conclusions**

**Potentially significant impact.** Cumulative impacts including cumulative growth and traffic impacts are potentially significant as a result of the proposed project. Additionally, the proposed project may have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. These subjects will be discussed in detail in the Supplemental EIR.

Section 2.3, Air Quality, analyzed cumulative impacts related to nonattainment status. The ICAQCD is already in nonattainment status for ozone, fine particulates, ultra fine particulates, nitrogen dioxide, and carbon monoxide. Therefore, a project-specific Air Quality Study and evaluation of mitigation measures would be necessary to evaluate potentially significant air quality impacts associated with the proposed project. As discussed in Section 2.3, the proposed project's cumulative impacts would be potentially significant. Mitigation measures would be required to reduce cumulative impacts. Therefore, the proposed project could cause potentially significant cumulative impacts.

Impacts associated with Agricultural Resources, Mineral Resources, and Recreation would be less than significant. Therefore, cumulative impacts associated with these topical areas would be less than significant.

Cumulative impacts related to Aesthetics, Geology and Soils, Hazards and Hazardous Materials, and Hydrology and Water Quality would be less than significant with incorporation of MMs A-1 through A-8, GEO-1 through GEO-10, HAZ-1 through HAZ-4, and WR-1 through WR-4.

Cumulative impacts related to Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Land Use and Planning, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire will be analyzed in the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

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

### **Summary of Certified EIR**

The Certified EIR did not identify any environmental effects that would cause substantial adverse effects on human beings. State guidelines require that all projects subject to CEQA address the direct and indirect effects of a project on global warming. While the Specific Plan project would not directly affect global temperatures, indirect cumulative effects must be considered. However, the Certified EIR concluded that cumulative impacts from the Specific Plan would be less than significant with mitigation incorporated. Therefore, environmental effects that would cause substantial adverse effects on human beings as a result of the Specific Plan would be less than significant.

## Rancho Los Lagos Specific Plan Analysis and Conclusions

**Potentially significant impact.** Based on the discussion provided in the Project Description and the analysis presented in Sections 2.1 through 2.19, the proposed project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Potentially significant impacts would be reduced with implementation of MM GEO-1 through MM GEO-10, MM HAZ-2 through MM HAZ-4, and MM WR-2 through MM WR-4. Additionally, the proposed project's potential effects on human beings would be analyzed in the Supplemental EIR, and mitigation measures will be identified and included in the Mitigation Monitoring and Reporting Plan for the proposed project to reduce any potential impacts. This issue will be analyzed in relevant topical sections of the Supplemental EIR to identify the potential impacts along with any requisite mitigation.

### Mitigation Measures

The following mitigation measures have been incorporated into this document from the Certified EIR and would be submitted to the City for adoption and included in the Mitigation Monitoring and Reporting Plan for this project and implemented upon project approval:

MM A-1, MM A-2, MM A-3, MM A-4, MM A-5, MM A-6, MM A-7, MM A-8, MM GEO-1, MM GEO-2, MM GEO-3, MM GEO-4, MM GEO-5, MM GEO-6, MM GEO-7, MM GEO-8, MM GEO-9, MM GEO-10, MM HAZ-1, MM HAZ-2, MM HAZ-3, MM HAZ-4, MM WR-1, MM WR-2, MM WR-3, and MM WR-4.

Any additional mitigation measures to be included in the Mitigation Monitoring and Reporting Plan for the proposed project will be discussed in the Supplemental EIR.

## SECTION 3: LIST OF PREPARERS

### **FirstCarbon Solutions**

967 Kendall Drive  
#A-537  
San Bernardino, CA 92407  
Phone: 714.508.4100

Project Director .....	Mary Bean
Senior Project Manager .....	Cecilia So
Legal Counsel .....	Megan Starr, JD
Director of Cultural Resources.....	Dana DePietro, PhD, RPA
Project Manager .....	Rachel Krusenowski
Assistant Project Manager .....	Stephanie Shepard
Director of Noise and Air Quality .....	Phil Ault, LEED® AP
Senior Biologist.....	Michael W. Tuma, PhD
Environmental Analyst.....	Hannah Carney
Senior Managing Editor .....	Susie Harris
Publications Coordinator .....	Alec Harris
Technical Editor .....	Sarah Vine
Document Specialist .....	Melissa Ramirez
GIS/Graphics .....	Karlee McCracken

### **Landmark Consultants, Inc.**

780 North 4th Street  
El Centro, CA 92243  
Phone: 760.337.1100

### **KOA Corporation**

1100 Corporate Center Drive, Suite 201  
Monterey Park, CA 91754  
323.260.4703

### **GS Lyon Consultants, Inc.**

780 North 4th Street  
El Centro, CA 92243  
760.337.1100

THIS PAGE INTENTIONALLY LEFT BLANK