

**DRAFT**

**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**IMPERIAL VALLEY CENTER FOR EXCEPTIONAL CHILDREN –  
IVCEC WEST**

**EL CENTRO, IMPERIAL COUNTY, CALIFORNIA**

July 2023

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MITIGATED NEGATIVE DECLARATION**

**IMPERIAL VALLEY CENTER FOR EXCEPTIONAL CHILDREN –  
IVCEC WEST**

Submitted to:

Imperial County Office of Education  
1398 Sperber Road  
El Centro, CA 92243

Prepared by:

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July 2023

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## TABLE OF CONTENTS

TABLE OF CONTENTS .....	i
FIGURES AND TABLES .....	ii
LIST OF ABBREVIATIONS AND ACRONYMS .....	iii
<b>1.0 PROJECT INFORMATION .....</b>	<b>1-1</b>
<b>2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.....</b>	<b>2-7</b>
2.1 Determination.....	2-7
<b>3.0 CEQA ENVIRONMENTAL CHECKLIST.....</b>	<b>3-1</b>
3.1 Aesthetics .....	3-1
3.2 Agriculture and Forestry Resources .....	3-3
3.3 Air Quality .....	3-5
3.4 Biological Resources.....	3-12
3.5 Cultural Resources.....	3-16
3.6 Energy .....	3-18
3.7 Geology and Soils.....	3-19
3.8 Greenhouse Gas Emissions.....	3-23
3.9 Hazards and Hazardous Materials .....	3-27
3.10 Hydrology and Water Quality .....	3-32
3.11 Land Use and Planning.....	3-36
3.12 Mineral Resources .....	3-37
3.13 Noise.....	3-38
3.14 Population and Housing .....	3-43
3.15 Public Services .....	3-44
3.16 Recreation .....	3-47
3.17 Transportation.....	3-48
3.18 Tribal Cultural Resources.....	3-52
3.19 Utilities and Service Systems .....	3-54
3.20 Wildfire.....	3-57
3.21 Mandatory Findings of Significance.....	3-59
<b>4.0 REFERENCES.....</b>	<b>4-2</b>

## APPENDICES

### APPENDIX A CALEEMOD REPORT

### APPENDIX B TRAFFIC IMPACT ANALYSIS

## FIGURES AND TABLES

### FIGURES

Figure 1: Project Location .....	1-4
Figure 2: Proposed Project.....	1-5

### TABLES

Table 1: Special Requirements for School Site Selection and Approval .....	2-8
Table 2: ICAPCD Thresholds of Significance for Criteria Pollutants of Concern .....	3-7
Table 3: Project Construction Emissions .....	3-8
Table 4: Project Operation Emissions .....	3-8
Table 5: Operational GHG Emissions .....	3-24
Table 6: Typical Construction Equipment Noise Levels.....	3-40

## LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
APN	Assessor's Parcel Number
BACT	best available control measures
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers' Association
CARB	California Air Resource Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH <sub>4</sub>	methane
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	Carbon dioxide equivalent
County	Imperial County
dB	decibel
dBA	A-weighted decibel
DPM	diesel-particulate matter
DSA	Division of State Architect
DTSC	California Department of Toxic Substances
EIR	environmental impact report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
GHG	greenhouse gas
GWP	global warming potential
ICAPCD	Imperial County Air Pollution Control District
ICOE	Imperial County Office of Education
IID	Imperial Irrigation District
IS/MND	Initial Study/Mitigated Negative Declaration
IVCEC	Imperial Valley Center for Exceptional Children
IWSP	Interim Water Supply Policy
kV	kilovolt
L <sub>dn</sub>	Day-night sound level, dBA
L <sub>eq</sub>	Equivalent sound level, dBA
L <sub>max</sub>	Maximum instantaneous noise level
LOS	level of service
LRA	Local Responsibility Area

LU	Limited Use
MHFP	Multihazard Functional Plan
MT/yr	metric ton per year
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAF	Naval Air Facility
NAHC	Native American Heritage Commission
NO <sub>x</sub>	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PM <sub>10</sub>	Particulate matter diameter 10 microns
PM <sub>2.5</sub>	Particulate matter diameter 2.5 microns
PPV	peak particle velocity
PRC	Public Resources Code
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SEMS	Standardized Emergency Management System
sf	square foot
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur oxide
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SYCL	South Yuma County Landfill
TAC	toxic air contaminant
USACE	United States Army Corps of Engineers
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WDR	waste discharge requirements

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## 1.0 PROJECT INFORMATION

**1. Project Title:**

Imperial Valley Center for Exceptional Children – IVCEC West

**2. Lead Agency Name and Address:**

Imperial County Office of Education  
1398 Sperber Road  
El Centro, CA 92243

**3. Contact Person and Phone Number:**

Wendy Rangel, Facilities Manager, (760) 312-6435

**4. Project Location:**

The project site is located on the west side of Sperber Road, approximately 375 feet south of the southeast corner of the intersection of West McCabe Road and Sperber Road in the city of El Centro.

**5. Project Sponsor's Name and Address:**

N/A

**6. General Plan Designation:**

Public

**7. Zoning:**

Limited Use (LU)

**8. Description of Project:**

The Imperial County Office of Education (ICOE) proposes to develop the proposed Center for Exceptional Children on a 6.95-acre portion of Assessor's Parcel Number (APN) 054-510-001. The project would include a 43,433-square foot (sf) primary building housing the reception, clerical areas, staff restrooms, offices, and visitor restrooms. The building would include a designated place for California Children Services, resource specialists, and therapy areas. The 43,433-sf building would also include a Multipurpose Therapy room with a warming kitchen and 8 classrooms for the severely handicapped population and 5 classrooms for infant preschool. Buildings 2 and would be modular buildings consisting of 4 preschool classrooms totaling 4,580 sf each. Future Building 3 would include 4 classrooms with an area of 4,580 sf. The proposed project would include 17 classrooms with a maximum enrollment of 153 students and up to 42 staff.

Parking Lot A, which would be accessed from Betty Jo McNeece Loop, would consist of a bus drop-off and would provide 67 parking spaces for parents, staff, and visitors. As part of Parking Lot A, a lane would be reserved for bus traffic and another dedicated lane for parent vehicles. These lanes would be identified with proper signage throughout

the parking lot, providing an additional element of safety and guidance for everyone entering and exiting the site. Parking Lot B, which would be accessed from Sperber Road at least 100 feet south of Betty Jo McNeece Loop, would provide 25 parking spaces and would serve as overflow parking for staff and afterschool functions. Parking Lot B would include access for emergency vehicles. As required, a fire lane is proposed surrounding the buildings.

The project would also install stop signs on both approaches on Betty Jo McNeece Loop at its intersection with Sperber Road.

The Imperial Valley Center for Exceptional Children (IVCEC) Program would follow a traditional academic year calendar, 180-day educational full day program for students in Preschool through 12+/transition grades (ages 3-22). IVCEC attendance would begin in mid-August and end in the beginning of June. All IVCEC enrolled students would then begin their Extended School Year (ESY) session, during the middle of June through the early weeks of July. It may be determined by the Individualized Education Program team that students within the Preschool Autism setting, who are challenged with the most severe impacts as a result of their disability, would have the opportunity to attend an additional ESY session, which would occur mid-July and end early August.

Preschool aged students (ages 3-5) would attend up to three and half hours per day. IVCEC would operate two sessions for preschool aged students, a morning session from 8:15 a.m. -11:45 a.m. and an afternoon session that would run from 11:30 a.m. - 2:30 p.m. The IVCEC school day for school-age students (grades K-12+/Transition) would be up to six (6) hours - 8:30 a.m.-2:30 p.m.

The project site is located on the west side of Sperber Road approximately 375 south of the southeast corner of the intersection of West McCabe Road and Sperber Road in the city of El Centro. Figure 1 identifies the project vicinity, and Figure 2 identifies the proposed project. The project site is currently under agricultural production (row crops). The project site is located between Imperial County (County) government facilities to the east and farmland to the south and west. The ICOE Building E is located north of the project site. Parcels to the east and west of the project site are located within the county of Imperial, while lands to the north and south of the site are located within the city of El Centro.

Elevation for the project is relatively level, ranging from minus 19 feet below mean sea level to minus 24 feet below mean sea level. Predominant vegetation communities in the project area and vicinity consist of cultivated plants, nonnative grasses, and saltbush (*Atriplex lentiformis*).

## 9. Surrounding Land Uses and Setting:

To the north and south of the project site are lands designated by the El Centro General Plan Land Use Map as Public (agricultural lands and the ICOE Building E). To the east are lands designated by the Imperial County General Plan Land Use Map as Special Purpose Facility (Imperial County Probation Department). To the west are lands designated by the Imperial County General Plan Land Use Map as Agriculture (agricultural lands).

**10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

- California Department of Education, School Facilities and Transportation Unit
- Department of Toxic Substance Control
- Division of the State Architect
- Regional Water Quality Control Board
- City of El Centro Public Works
- Imperial Irrigation District

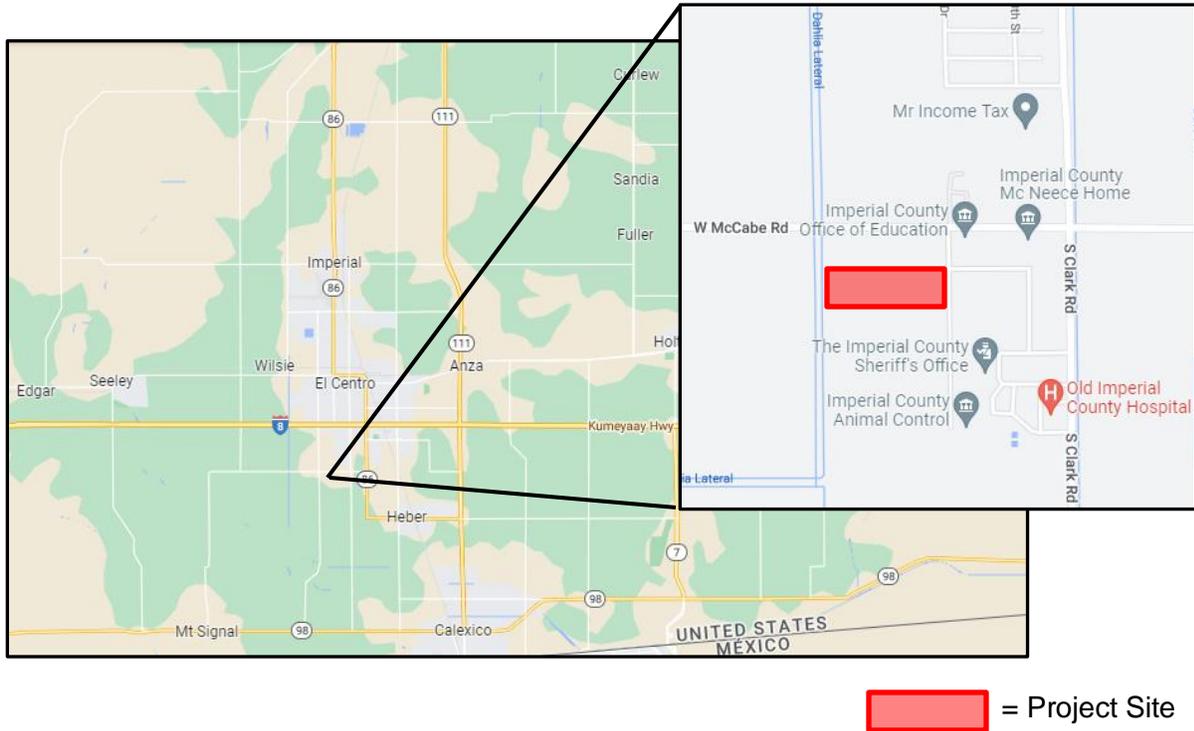


Figure 1: Project Location

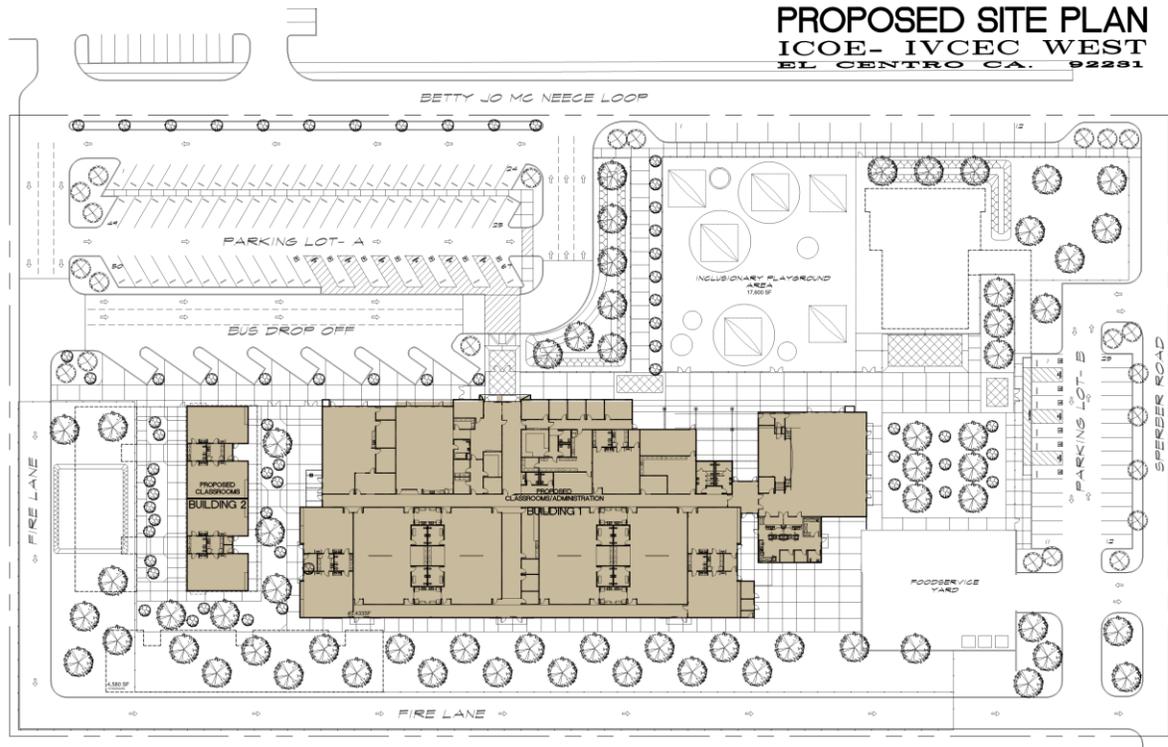


Figure 2: Proposed Project

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The ICOE requested a Sacred Lands File search from the Native American Heritage Commission in November 2022. Pursuant to AB 52, the ICOE contacted the tribal representatives on the list in December 2022. To date, the ICOE has received no responses from tribal representatives. In the event that the tribal representatives express interest in the project and/or the project area, the ICOE will coordinate with the tribes to address any concerns.

## 2.0 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 in Chapter 3.0.

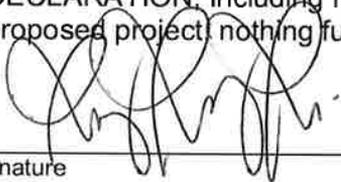
- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources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

## 2.1 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 measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature



Date



### Special Requirements under the State School Facility Program

In addition to the CEQA Guidelines, primary and secondary public schools have several additional requirements established by the California Code of Regulations and California Education Code. Table 1 identifies the specific health and safety requirements for a state-funded new school or a state-funded addition to an existing school site. These health and safety requirements are outlined in the California Department of Education (CDE) School Site Selection and Approval Guide. The analyses and response is included under the relevant section identified in the table below.

**Table 1: Special Requirements for School Site Selection and Approval**

Topic	Environmental Code	Environmental Checklist
<b>Air Quality</b>		
Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	PRC § 21151.8(a)(1)(D); Ed. Code § 17213(c)(2)(C)	Section 3.3 Air Quality, Question (e)
Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	PRC § 21151.8 (a)(2); Ed. Code § 17213 (b)	Section 3.3 Air Quality, Question (f)
<b>Geology and Soils</b>		
Does the site contain an active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan?	CCR, Title 5 § 14010(f); Ed. Code, § 17212	Section 3.7 Geology and Soils, Question (a) (i)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to moderate to high liquefaction?	CCR, Title 5 § 14010(i)	Section 3.7 Geology and Soils, Question (a)(iii)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to landslides?	CCR, Title 5 § 14010(i)	Section 3.7 Geology and Soils, Question (a)(iv)
Would the project involve the construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building?	CCR, Title 5 § 14010(f); Ed. Code § 17212	Section 3.7 Geology and Soils, Question (a)(i)
<b>Hazards and Hazardous Materials</b>		
Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?	CCR, Title 5 § 14010(c)	Section 3.9 Hazards and Hazardous Materials, Question (h)
Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or	CCR, Title 5 § 14010(h)	Section 3.9 Hazards and

underground pipeline that can pose a safety hazard to the site?		Hazardous Materials, Question (i)
Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?	CCR, Title 5 § 14010(t)	Section 3.9 Hazards and Hazardous Materials, Question (d)
Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?	PRC § 21151.8 (a)(1)(C)	Section 3.9 Hazards and Hazardous Materials, Question (i)
Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? <i>(Does not apply to school sites approved by CDE prior to January 1, 1997.)</i>	Ed. Code § 17215.5 (a)	Section 3.9 Hazards and Hazardous Materials, Question (j)
Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	PRC § 21151.8 (a)(1)(A)	Section 3.9 Hazards and Hazardous Materials, Question (k)
Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?	PRC § 21151.8 (a)(1)(B)	Section 3.9 Hazards and Hazardous Materials, Question (d)
If prepared, has the risk assessment been performed with a focus on children’s health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site?	Ed. Code § 17210.1 (a)(3)	Section 3.9 Hazards and Hazardous Materials, Question (c)
If a response action is necessary and proposed as part of this project, has it been developed to be protective of children’s health, with an ample margin of safety?	Ed. Code § 17210.1 (a)(4)	Section 3.9 Hazards and Hazardous Materials, Question (l)
Is the proposed school site within two miles, measured by airline, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? <i>(Does not apply to school sites acquired prior to January 1, 1966.)</i>	Ed. Code § 17215 (a)&(b)	Section 3.9 Hazards and Hazardous Materials, Question (e)
<b>Hydrology and Water Quality</b>		
Is the project site subject to flooding or dam inundation?	CCR, Title 5 § 14010(g); Ed. Code § 17212;	Section 3.10 Hydrology and Water Quality, Question (d)
<b>Land Use and Planning</b>		
Would the proposed school conflict with any existing or proposed land uses, such that a potential health or safety risk to students would be created?	CCR, Title 5 § 14010(m)	Section 3.11 Land Use and Planning, Question(b)

<b>Noise</b>		
Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?	CCR, Title 5 § 14010(e)	Section 3.13 Noise, Question (d)
<b>Public Services</b>		
Does the site promote joint use of parks, libraries, museums, and other public services?	CCR, Title 5 § 14010(o)	Section 3.15 Public Services, Question (f)
<b>Transportation</b>		
Is the proposed school site within 1,500 feet of a railroad track easement?	CCR, Title 5 § 14010(d)	Section 3.17 Transportation, Question (e)
Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?	CCR, Title 5 § 14010(k)	Section 3.17 Transportation, Question (f)
Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?	CCR, Title 5 § 14010(l)	Section 3.17 Transportation, Question (g)

### 3.0 CEQA ENVIRONMENTAL CHECKLIST

#### 3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<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"/>

##### 3.1.1 Impact Analysis

a. *Would the project have a substantial effect on a scenic vista?*

The proposed project area is located in a rural area characterized by views of County facilities, agricultural uses, and water delivery network infrastructure. According to the Imperial County General Plan Environmental Impact Report (EIR), scenic resources include desert areas, sand hills, mountains, the Salton Sea, agricultural areas, and urban areas. While the project site is surrounded by agricultural uses to the west and south, the area does not represent a scenic vista due to development of public facilities to the north and east. Development of the proposed project would have no impact on a scenic vista.

b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The project site is devoid of trees, rock outcroppings, and historic structures. Additionally according to the California Department of Transportation (Caltrans), there are no officially designated State Scenic Highways in Imperial County. The nearest Eligible State Scenic Highway is Highway 78 to the east of Highway 86 approximately 30 miles northwest of the project site.<sup>1</sup> The proposed project is not within the viewshed of a state scenic highway; therefore, project construction and operation would have no impact on scenic resources within a state scenic highway.

<sup>1</sup> Esri. 2018. California Scenic Highways. <https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a>. Accessed November 2022.

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

Views of the project area from publicly accessible vantage points (i.e., Sperber Road and West McCabe Road) currently consist of agricultural fields. Views of the surrounding areas contain surrounding County facilities and agricultural lands in the foreground, agricultural lands and water delivery network infrastructure in the middle ground, and trees and mountains in the background. The proposed project would introduce new features that would be visible from publicly accessible vantage points; however, construction and operation of the proposed project would be consistent with the proposed use identified in the Imperial County General Plan and would not degrade the visual quality of the site or surroundings. Impacts would be less than significant.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The proposed project includes construction of new administration/classroom buildings. The project would include a variety of indoor and outdoor lighting. Lighting would be provided for adequate illumination for safe access and basic security. Exterior lighting would include wall-mounted fixtures on buildings and bollard lighting. Pole-mounted lighting would be shielded and directional so as to direct light away from surrounding land uses. As discussed in the City Municipal Code, development standards within the Limited Use zone shall be those of the General Commercial Zone. Therefore, light and glare generated by the project would be consistent with requirements for General Commercial zones, which includes requirements to provide illumination for the security and safety of on-site areas such as parking, loading, shipping and receiving, walkways, and working areas (Article II, Division 3, Sec 29-63 (n)). Because the project would provide nighttime lighting consistent with the City Municipal Code, this impact would be less than significant.

### 3.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

#### 3.2.1 Impact Analysis

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

The project site is designated as Farmland of Statewide Importance on the Imperial County Important Farmland Map released by the California Department of Conservation<sup>2</sup>. The project site consists of agricultural lands adjacent to water delivery network infrastructure. The Imperial County General Plan Agricultural Element identifies that no agricultural land

<sup>2</sup> California Department of Conservation. 2018. *Imperial County Important Farmland Map*. <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed December 2022.

“shall be removed from the agriculture category except where needed for use by a public agency, for renewable energy purposes, where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated...” Therefore, the removal of agricultural land by the Imperial County Office of Education is acceptable and consistent with the County’s policy because the land is being used by a public agency to improve services to the general public. Impacts would be less than significant.

*b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

According to the City of El Centro General Plan Update Draft Program EIR<sup>3</sup> there are no Williamson Act contracts in or in the vicinity of the City. Therefore, the project would not conflict with zoning for agricultural use or Williamson Act Contract.

*c. Would the project 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))?*

The project site is surrounded by agricultural and public uses. The site’s existing zoning (Limited Use) does not support the definitions provided by Public Resources Code (PRC) Section 42526 for timberland, PRC Section 12220(g) for forestland, or Government Code Section 51104(g) for timberland zoned for production. Therefore, no impacts related to the conversion of timberlands or forest land would occur.

*d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?*

As discussed in the response 3.2.1(c), the project site is surrounded by public and agricultural uses. Implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

*e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

As discussed in the response 3.2.1(a), the removal of agricultural land by the Imperial County Office of Education is acceptable and consistent with the County’s policy because the land is being used by a public agency to improve services to the general public. No forest land is located within the project site or the vicinity of the project site. Impacts would be less than significant.

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<sup>3</sup> City of El Centro. 2020a. City of El Centro General Plan Update Draft Program EIR. March.

### 3.3 AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.3.1 Impact Analysis

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

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

The Imperial County Air Pollution Control District (ICAPCD) is the air district responsible for the project area. Applicable ICAPCD air quality plans include:

- Imperial County 2009 State Implementation Plan for Particulate Matter Less than 10 Microns in Aerodynamic Diameter;

- Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Non-attainment Area; and
- Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard.

The primary concern for achieving consistency with air quality plans is whether the project would induce growth that would result in a net increase in criteria pollutant emissions that exceed the assumptions used to develop the plan. The criteria pollutant emission projections for the ICAPCD air quality plans are based on Southern California Association of Governments' (SCAG) population growth and regional vehicle miles traveled (VMT) projections, which are based in part on the land uses established by local general plans. As such, projects that propose development that is consistent with the local land use plans would be consistent with growth projections and air quality plans criteria pollutant emissions estimates. In the event that a project would result in development that is less dense than anticipated by the growth projections, the project would be considered consistent with the air quality plans. In the event a project would result in development that results in greater than anticipated growth projections, the project would result in air pollutant emissions that may not have been accounted for in the air quality plans and thus may obstruct or conflict with the air quality plans.

The General Plan land use designation for the project site is Public, and the site is zoned Limited Use. The project would be consistent with the land use designations for the project site. As a result, the project would be consistent with the growth projections and air quality plans criteria pollutant emissions estimates. Furthermore, the project would not construct housing or other uses that would result in regional population growth. The project would provide needed educational capacity for the existing population. Therefore, the project would not result in new growth beyond what was originally anticipated in SCAG's growth projections for Imperial County. Additionally, as demonstrated in Tables 2 and 3 in Response 3.3(b), operation of the project would result in emissions that are below ICAPCD significance thresholds. Therefore, project emissions would be consistent with SCAG's growth projections and the ICAPCD's air quality plans, and impacts would be less than significant.

*b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

The project site is in nonattainment areas for NAAQS and CAAQS for ozone and particulate matter. The majority of regional 10-micron particulate matter (PM<sub>10</sub>) and 2.5-micron particulate matter (PM<sub>2.5</sub>) emissions originate from dust stirred up by wind or by vehicle traffic on unpaved roads (ICAPCD 2009). Other PM<sub>10</sub> and PM<sub>2.5</sub> emissions originate from grinding operations, combustion sources such as motor vehicles, power plants, wood burning, forest fires, agricultural burning, and industrial processes. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Nitrogen oxides (NO<sub>x</sub>) and reactive organic gases (ROG) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. Approximately 88 percent of NO<sub>x</sub> and 40 percent of ROG regional emissions originate from on- and off-road vehicles

(ICAPCD 2010). Other major sources include solvent evaporation and miscellaneous processes such as pesticide application.

Implementation of the project would result in air pollutant emissions associated with the construction and operation of the project. The ICAPCD adopted its *CEQA Air Quality Handbook: Guidelines for the Implementation of the California Environmental Quality Act of 1970* in 2007 and amended the handbook in December 2017 (ICAPCD 2017). The ICAPCD CEQA Air Quality Handbook provides guidance on how to determine the significance of impacts, including air pollutant emissions, related to the development of residential, commercial, and industrial projects. Emissions were calculated using California Emissions Estimator Model (CalEEMod) Version 2022<sup>4</sup>, and were compared to ICAPCD thresholds. Appendix A contains CalEEMod output worksheets. Results are summarized in Table 3.

The ICAPCD provides project-level thresholds of significance for: PM<sub>10</sub>, the precursors to ozone, which are reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO). The current thresholds are provided in Table 2.

**Table 2: ICAPCD Thresholds of Significance for Criteria Pollutants of Concern**

Pollutant	Thresholds of Significance
ROG	75 pounds/day
NO <sub>x</sub>	100 pounds/day
CO	550 pounds/day
PM <sub>10</sub>	150 pounds/day

Source: Imperial County Air Pollution Control District 2017

Potential air quality impacts associated with short-term construction and long-term operations were evaluated in accordance with ICAPCD-recommended and the CARB-approved methodologies. Construction and operational emissions of criteria air pollutants were compared with the applicable thresholds of significance (described below) to determine potential impacts. ICAPCD's significance thresholds are used to determine whether the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and also serve a proxy to determine the potential for the project to conflict with or obstruct implementation of any applicable air quality plan.

<sup>4</sup> <https://caleemod.com/model>

**Table 3: Project Construction Emissions**

	Emissions (lbs/day)					
	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 2023	18.6	17.1	1.83	0.02	169	17.5
Year 2024	13.8	10.5	89.5	0.02	87.2	9.12
ICAPCD Significance Threshold	550	100.0	75	N/A	150.0	N/A
<b>Exceed Threshold?</b>	No	No	Yes	No	Yes	No

Source: Compiled by SSS, Inc. (2023).

CO = carbon monoxide

N/A = Not Applicable

NO<sub>x</sub> = nitrogen oxides

PM<sub>10</sub> = particulate matter less than 10 microns in size

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

ROG = reactive organic gases

ICAPCD = Imperial County Air Pollution Control District

SO<sub>x</sub> = sulfur oxides

Lbs/day = pounds per day

As shown in Table 3, construction emissions associated with the proposed project would be less than significant for NO<sub>x</sub> and CO. However, without the implementation of practices that would reduce ROG and PM<sub>10</sub> emissions, air quality construction impacts would be significant. With the implementation of **Mitigation Measure AIR-1**, which requires construction best management practices, the impact would be less than significant.

CalEEMod was also used to estimate long-term operational emissions, as well as emissions associated with area and energy sources (i.e., natural gas combustion, landscape maintenance, periodic architectural coating, and consumer products).

Model results are shown in Table 4. Appendix A contains model output worksheets.

As shown in Table 4, project-related long-term air emissions would occur primarily from vehicle trips associated with the proposed project (i.e., mobile source emissions). Project-related long-term air emissions would also occur from the use of landscape equipment and from the use of consumer products (i.e., area sources).

**Table 4: Project Operation Emissions**

	Emissions (lbs/day)					
	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Energy Source Emissions	0.21	0.25	0.01	<0.005	0.02	0.02
Area Source Emissions	2.74	0.02	2.05	<0.005	<0.005	<0.005
Mobile Source Emissions	5.53	0.69	2.86	<0.005	<0.005	<0.005
<b>Total Emissions</b>	8.48	0.96	4.92	<0.01	0.03	0.03
ICAPCD Significance Threshold	550.0	137.0	137.0	150.0	150.0	550.0
<b>Exceed Threshold?</b>	No	No	No	No	No	No

Source: Compiled by SSS, Inc. (2023).

CO = carbon monoxide

N/A = Not Applicable

NO<sub>x</sub> = nitrogen oxides

PM<sub>10</sub> = particulate matter less than 10 microns in size

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

ROG = reactive organic gases

ICAPCD = Imperial County Air Pollution Control District

SO<sub>x</sub> = sulfur oxides

tons/yr = tons per year

The results shown in Table 4 indicate the project would not exceed the significance criteria. Therefore, the proposed project would not violate any air quality standard or contribute

substantially to an existing or projected air quality violation, and impacts would be less than significant. No mitigation is required.

*c. Would the project expose sensitive receptors to substantial pollutant concentrations?*

During construction, diesel equipment would be operating. Diesel particulate matter (DPM) is known to the State of California as a toxic air contaminant (TAC). The risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined in the California Air Pollution Control Officers' Association (CAPCOA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines as 24 hours per day, seven days per week, 365 days per year, for 70 years. DPM would be emitted during the short term of construction assumed for the proposed project from heavy equipment used in the construction process. Because diesel exhaust particulate matter is considered carcinogenic, long-term exposure to diesel exhaust emissions has the potential to result in adverse health impacts. Due to the short-term nature of project construction and the implementation of **Mitigation Measure AIR-1**, impacts from exposure to diesel exhaust emissions during construction would be less than significant. No DPM-generating equipment, aside from potential landscape equipment, would be located on-site during operation of the proposed project; therefore, the proposed project would result in intermittent operation of DPM-generating equipment. This impact would be less than significant.

*d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The CEQA guidelines indicate that a significant impact would occur if the proposed project would create objectionable odors affecting a substantial number of people. Construction of the proposed project would emit diesel exhaust and volatile organic compounds, which are objectionable to some; however, emissions will disperse rapidly from the project site and the activity would be temporary. Impacts due to objectionable odors would be less than significant.

*e. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?*

Busy traffic corridors are defined as 50,000 vehicles per day in a rural area as defined by the California Department of Education (CDE). The nearest highway is Highway 86, which is located approximately 0.7 mile east of the proposed project area. Highway 86 in the project vicinity experiences an average daily traffic of 7,900 vehicles per day<sup>5</sup>. There would be no impact related to placement of a school within 500 feet of a freeway or a busy traffic corridor.

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<sup>5</sup> California Department of Transportation (Caltrans). 2017. Traffic Counts on Route 82-86. <https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-82-86>. Accessed December 2022.

- f. *Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?*

Within one-quarter mile of the proposed project area are institutional and agricultural uses. Agricultural operations (row crops) are located adjacent to the proposed school site; however, these uses would not create an air quality hazard for the proposed project. As discussed in response 3.3.1(e), the nearest highway is east of the proposed project area; however, Highway 86 does not satisfy the definition of a busy traffic corridor. The project area is located approximately 1.8 miles west of the existing Union Pacific line. This impact would be less than significant.

### **3.3.2 Mitigation Measures**

**Mitigation Measure AIR-1:** The project shall adopt best available control measures (BACT) to minimize emissions from surface disturbing activities to comply with ICAPCD Regulation VIII (Fugitive Dust Rules). These measures include the following:

- All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
- All on-site and off-site unpaved roads shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- All unpaved traffic areas of 1 acre or more with 75 or more average vehicle trips per day shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- The transport of bulk materials shall be completely covered unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material.
- All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
- The construction of any new unpaved road shall be prohibited within any area with a population of 500 or more unless the road meets the definition of a temporary

- unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
  - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
  - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
  - All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
  - Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

### 3.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>

#### 3.4.1 Impact Analysis

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

A search of the California Department of Wildlife’s (CDFW’s) California Natural Diversity Database (CNDDDB) El Centro 7.5-minute quadrangle identified 12 occurrences of special-status animal species and no special-status plant species.<sup>6</sup> In 2020, RECON Environmental, Inc. prepared a Biological Technical Report for a larger site that included the proposed project area. During field surveys conducted for the 2020 Biological Technical Report,<sup>7</sup> an American kestrel and western burrowing owl were observed within the larger survey area. Raptor species have a low to moderate potential to nest in the trees adjacent to the project

<sup>6</sup> California Department of Fish and Wildlife. 2022. BIOS Viewer. <https://apps.wildlife.ca.gov/bios/> Accessed December 2022.

<sup>7</sup> RECON Environmental, Inc. 2020a. Biological Technical Report for the Monte Vista Regional Soccer and Wellness Park Project, Imperial County, California. November 2020.

site. Western burrowing owls have a moderate to high potential to forage within the project site. In 2020 RECON Environmental, Inc. conducted a focused western burrowing owl survey<sup>8</sup> during which one adult western burrowing owl and one active burrow were detected during the 2020 non-breeding season surveys. Therefore, any impacts to an active burrowing owl burrow and/or raptor nest would be considered significant and would require mitigation.

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

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

The project site does not contain any riparian habitats or agricultural drains or canals that would be considered wetland or non-wetland waters under the jurisdiction of the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or the CDFW. As such, no impacts to riparian habitats would not occur.

- c. *Would the project 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?*

See Response 3.4.2(b).

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The project site has been previously used for agricultural uses. The project site does not serve as a nursery site. Additionally, the project site does not contain wildlife travel routes, such as a riparian strip, ridgeline, drainage, or wildlife crossings, such as a tunnel, culvert, or underpass. No impact to wildlife movement would occur.

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

There are currently no adopted or proposed local policies or ordinances protecting biological resources that affect the project site. As stated, the project site is highly disturbed and does

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<sup>8</sup> RECON Environmental, Inc. 2020b. 2020 Western Burrowing Owl Focused Survey for Monte Vista Regional Soccer and Wellness Park Project. December 16, 2020.

not support sensitive biological resources, including mature trees. Therefore, no impact would occur.

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project site is located in a rural area that is not part of an adopted habitat conservation plan, natural community conservation plan, or other conservation plan. Therefore, construction and operation of the proposed project would have no impact to an approved habitat conservation plan.

### 3.4.2 Mitigation Measures

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

**Mitigation Measure BIO-2:** As required per the California Department of Fish and Wildlife (CDFW) protocol guidelines, pre-construction take-avoidance surveys shall be conducted prior to any project-related ground disturbance. One survey shall be conducted no less than 14 days before the start of ground disturbing activities, and a second survey shall be conducted within 24 hours of the start of ground disturbing activities. These surveys shall include all areas where suitable habitat is present within the survey area<sup>9</sup> with special focus on the area where the western burrowing owl was observed during 2020 focused surveys. Should burrowing owl be determined to still be occupying the survey area, the following measures shall be implemented:

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

***Mitigation for Unavoidable Impacts:*** On-site passive relocation shall be implemented, if the above avoidance requirements cannot be met. Passive relocation is defined as encouraging owls to move from occupied burrows to alternate natural or artificial burrows that are beyond 50 meters from the impact zone

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<sup>9</sup> California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. March.

and that are within or contiguous to a minimum of 6.5 acres of foraging habitat for each pair of relocated owls. Relocation of owls shall only be implemented during the non-breeding season. On-site habitat shall be preserved in a conservation easement and managed to promote burrowing owl use of the site.

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

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

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

### 3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §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 §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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.5.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

In 2020, RECON Environmental, Inc. conducted a Cultural Resources Survey<sup>10</sup> for a larger project area that included the proposed project site. As described in the Cultural Resources Survey, one previously unrecorded historic-period resource, a set of earthen and concrete-lined canals servicing the project site (9781-NDY-1), was recorded using a California State Parks Department of Parks and Recreation 523 primary site form. In addition, the survey found a previously unrecorded segment of the Dahlia Canal Lateral 1 (P-13-017171). 9781-NDY-1 (interior canals) and the unrecorded segment of P-13-017171 (Dahlia Canal Lateral 1) within and adjacent to the project area do not meet any of the criteria for listing on the California Register of Historic Places and are therefore not significant historical resources under CEQA. Because none of these resources are significant historical resources under CEQA, no impacts would occur as a result of project development.

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

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The project site has been disturbed by previous agricultural uses. Therefore, the potential for the site to contain archaeological resources is considered to be low.

However, unknown or unrecorded resources may potentially be revealed during construction activities associated with the construction of the proposed project. This may occur if ground disturbance activities penetrate deeper than previous work performed. California PRC protects archaeological, paleontological, and historical sites with a wide variety of state

<sup>10</sup> RECON Environmental, Inc. 2020c. Results of the Cultural Resources Survey for the Monte Vista Regional Soccer and Wellness Park Project, Imperial County, California. November 6, 2020.

policies and regulations in conjunction with CEQA. Furthermore, all construction activities must comply with PRC Section 21083.2-21084.1 and CEQA Guidelines Section 15064.5 and 15126.4(b), which address the protection of archaeological and historical resources. This impact would be less than significant.

*c. Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The project site has been previously disturbed by agricultural uses. During previous ground disturbance activities, no human remains were identified or recorded onsite. In the unlikely event that human remains are discovered, during precise grading or construction activities, the project would be subject to California Health and Safety Code Section 7050.5 and PRC Section 5097.98. California Health and Safety Code Section 7050.5 identify the required procedures to follow in the unlikely discovery of human remains. PRC Section 5097.98 stipulates the notification process during the discovery of Native American human remains, descendants, disposition of human remains, and associated artifacts. Therefore, adherence to all applicable codes and regulations would result in a less-than-significant impact.

### 3.6 ENERGY

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

#### 3.6.1 Impact Analysis

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

Title 24 is designed to provide certainty and uniformity throughout California while ensuring that the efficient and non-wasteful consumption of energy is carried out through design features. Adherence to Title 24 is deemed necessary to ensure that no significant impacts occur from the inefficient, wasteful, and unnecessary consumption of energy. The proposed buildings and remodels would be compliant with Title 24; therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.

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

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

### 3.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.7.1 Impact Analysis

- a. *Would the project 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.*

Imperial County, including the project site is located in the seismically active southern California region, and fault zones in the area include the San Andreas, San Jacinto, and Elsinore. As shown in the California Department of Conservation California Earthquake Hazards Zone Application,<sup>11</sup> the project site is not located within a known Alquist-Priolo Earthquake Fault Zone, and there are no known regional faults located beneath the project

<sup>11</sup> California Department of Conservation. 2022a. California Earthquake Hazards Zone Application. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed December 2022.

site. The nearest fault is the Imperial Fault, which is located approximately 7.0 miles east of the project site. Given the absence of a fault on the project site and the distance to the nearest fault, the risk of earthquake ground rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

*ii. Strong seismic ground shaking?*

As indicated in Response 3.7.1(a)(i), the site is located in the seismically active Imperial Valley of the southern California region. As such, the project site is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region, especially from earthquakes along the Imperial, Brawley, and Superstition Hills faults.

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

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

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

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

*iii. Seismic-related ground failure, including liquefaction?*

According to the California Office of Emergency Services MyHazards web viewer,<sup>12</sup> the project area is not located in an area requiring liquefaction investigation. The project site is underlain by Imperial-Glenbar silty clay loams (0-2 percent slopes) soils.<sup>13</sup> Since the project site contains silty soils, there is the potential for liquefaction induced settlements and ground failure from project development. Compliance with the CBC would mitigate any potential risks associated with liquefaction. Therefore, impacts would be less than significant.

<sup>12</sup> California Office of Emergency Services. 2015. MyHazards. <http://myhazards.caloes.ca.gov/>. Accessed December 2022.

<sup>13</sup> U.S. Department of Agriculture. 2022. Web Soil Survey. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed December 2022.

*iv. Landslides?*

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

*b. Would the project result in substantial soil erosion or the loss of topsoil?*

Project construction activities, including land clearing, grading, and excavation, would disturb on-site soils, temporarily exposing them to wind and water erosion. Mitigation Measure HYD-1 (discussed in Section 3.10) would require the project to prepare and submit a stormwater pollution prevention plan (SWPPP) that identifies best management practices (BMPs) to reduce construction effects on receiving water quality by implementing erosion control measures and reducing or eliminating non-stormwater discharges. A SWPPP provides a schedule for the implementation and maintenance of erosion control measures and a description of site-specific erosion control practices, such as appropriate design details and a time schedule. The SWPPP would consider the full range of erosion control BMPs. Examples of construction BMPs to reduce erosion include the use of temporary mulching, seeding, or other suitable stabilization measures to protect uncovered soils; performing clearing and earth-moving activities only during dry weather; and limiting construction access routes and stabilizing designated access points.

Project development would be required to comply with the City's General Plan Implementation Program PF-12 and S-6, which requires the implementation of BMPs in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit and proper drainage facilities to handle runoff. This program is implemented via the City's Municipal Code grading regulations that require the preparation of an erosion control plan prior to the issuance of a grading permit (Article XIX, section 7124) and that any future construction implement BMPs to control soil erosion (Article VII, Division 1, Section 22-707; Ord. No. 15-05, §1, 4-21-15). As compliance with these regulations ensure that no significant soil erosion impacts would occur and future development at the project site would be subject to these regulations, the project would have a less than significant impact related to substantial soil erosion.

Compliance with existing regulations would result in less than significant project impacts.

- c. *Would the project 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?*

See Responses 3.7.1(a)(i) and 3.7.1(a)(iii). Development of any structures on the project site would be required to comply with the CBC. Compliance with the CBC would ensure the project site would have a less than significant impact related to soil stability.

- d. *Would the project 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?*

The surface soils within the project site consist of silty clay loams. Due to the clay content, the surface soils have potential to be considered expansive, as they exhibit a moderate to high swell potential. Development of any structures on the project site would be required to comply with the CBC. Compliance with the CBC would ensure potential risks associated with expansive soils would be less than significant.

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

The project would not include installation of septic tanks, as the proposed project facilities would connect to the municipal sewer services. Therefore, the capability of the soils to support the operation of such tanks does not need to be evaluated. No impact to soils incapable of supporting septic tanks would occur in association with construction and operation of the project.

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

The surface soils within the project site consist primarily of silty clay and silty clay loams which have a low potential to yield significant paleontological resources. In addition, the integrity of the project area has been compromised through previous agricultural uses. Overall, the potential for significant paleontological resources to be present on-site is considered low, and future development of the site would have a less than significant impact to significant paleontological resources.

### 3.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.8.1 Impact Analysis

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Greenhouse gas (GHG) emissions are present in the atmosphere naturally, and are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. However, over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global climate change. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO<sub>2</sub>)
- Methane (CH<sub>4</sub>)
- Nitrous oxide (N<sub>2</sub>O)
- Hydrofluorocarbons
- Perfluorocarbons
- Sulfur Hexafluoride

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere (“atmospheric lifetime”).

The GWP of each gas is measured relative to CO<sub>2</sub>, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO<sub>2</sub> over a specified time period.

**Construction Greenhouse Gas Emissions.** Construction activities associated with the proposed project, such as site preparation, site grading, on-site construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

There is no threshold for construction-related activities. Using the online version of CalEEMod, it is estimated that construction of the proposed project would generate a total of approximately 184 metric tons of CO<sub>2</sub> equivalents (CO<sub>2</sub>e). When considered over the 30-year life of the project, the total amortized construction emissions for the proposed project would be 6.1 metric tons per year (MT/yr) of CO<sub>2</sub>e. As such, construction of the proposed project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant.

**Operational Greenhouse Gas Emissions.** Long-term GHG emissions are typically generated from mobile, area, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated haul trips to and from the site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions are typically generated at off-site utility providers as a result of increased electricity demand generated by a project. Stationary source emissions would be associated with emergency backup generators. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance and water distribution.

Operational emissions were estimated using CalEEMod and the results are presented in Table 5. CalEEMod output sheets are included in Appendix A.

**Table 5: Operational GHG Emissions**

Emissions Source Category	Operational Emissions (Metric Tons per Year)				
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	Percent of Total
Area	0.92	0.92	<0.005	0.92	0.3
Energy	302	302	0.02	303	99.7
Mobile	0.00	0.00	0.00	0.0	0.0
<b>Total Operational</b>					<b>100.0</b>

Source: SSS (2023).

Note: Due to rounding, the area emissions source is negligible in the percent total.

The proposed project would generate approximately 304 metric tons of CO<sub>2</sub>e per year of emissions, as shown in Table 5. The City of El Centro and the ICAPCD have not adopted

quantitative significance thresholds for determination of whether a project would have a significant impact on the environment or conflict with an applicable GHG-reduction plan, policy, or regulation. For purposes of this analysis, project-generated emissions were evaluated based on CAPCOA's recommended GHG threshold of 900 metric tons CO<sub>2</sub>e per year (MT CO<sub>2</sub>e/yr), as reflected in CAPCOA's *CEQA and Climate Change* white paper. Based on the emission estimates shown in Table 5, the proposed project would not result in the generation of substantial GHG emissions. As such, operation of the proposed project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant. As such, operation of the proposed project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant.

*b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

AB 32 is aimed at reducing GHG emissions to 1990 levels by 2020. AB 32 requires CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. The AB 32 Scoping Plan has a range of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

Executive Order B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan<sup>14</sup>, to reflect the 2030 target set by Executive Order B-30-15 and codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Executive Order B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving the 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

As identified above, the AB 32 Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set by AB 32, Executive Order B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are

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<sup>14</sup> California Air Resources Board, 2017. California's 2017 Climate Change Scoping Plan. November.

designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As discussed in Response 3.6.1(b), energy usage on the project site during construction would be temporary in nature. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Therefore, the proposed project would not conflict with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. The project would implement water conservation and efficiency strategies for irrigation and potable water distribution on the site. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. The ICOE anticipates that the project would continue to accommodate the students living in the vicinity of the proposed project site. The project would not conflict with reduction targets for passenger vehicles. Therefore, the proposed project would not conflict with policies and regulations that have been adopted for the purpose of reducing GHG from transportation sources.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in AB 32, the AB 32 Scoping Plan, Executive Order B-30-15, SB 32, and AB 197 and would be consistent with applicable state plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

### 3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? <i>(Does not apply to school sites approved by CDE prior to January 1, 1997.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k. Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 3.9.1 Impact Analysis

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

Construction of the proposed project would require the transport and use of small quantities of hazardous materials in the form of gasoline, diesel, and oil. There is the potential for small leaks due to refueling of construction equipment; however, implementation of BMPs identified in construction specification plans would reduce the potential for accidental release of construction-related fuels and other hazardous materials. These BMPs would prevent, minimize, or remedy stormwater contamination from spills or leaks, control the amount of runoff from the site, and require proper disposal and handling of hazardous materials.

Any on-site storage, transport, or use of hazardous materials during the operation of the proposed project would comply with local, state, and federal regulatory requirements.

Therefore, impacts associated with a potential hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

- b. *Would the project 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?*

See Response 3.9.1(a).

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The closest existing school is McCabe Union Elementary School, located approximately 1.5 miles west of the project site. The proposed project would include the development of classrooms and education-related facilities. Hazardous materials and wastes would be managed and used in accordance with all applicable federal, state, and local laws and regulations. In addition, disposal of any contaminated material would be in accordance with state and County regulations. Therefore, project compliance with all applicable regulations would ensure impacts regarding hazardous emissions, materials, substances, or waste would be less than significant.

- d. *Would the project 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?*

According to the Department of Toxic Substances (DTSC) Envirostor website,<sup>15</sup> the proposed project is located on a site that is included on a list of hazardous materials sites (school investigation site). According to the DTSC website, the investigation is closed and requires no further action. This impact would be less than significant.

- e. *Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 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?*

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

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would not interfere with the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The City of El Centro Standardized Emergency Management System (SEMS) Multihazard Functional Plan (MHFP) addresses the City's planned response. The project would not impair implementation of this plan. Development of the project site would include installation of stop signs at both approaches on Betty Jo McNeece Loop at its intersection with Sperber Road. Therefore, with the proposed road improvements the project would not interfere with an emergency evacuation plan. This impact would be less than significant.

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The California Department of Forestry and Fire Protection (CALFIRE) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Local Responsibility Areas (LRA).<sup>16</sup> The project site is located in an unzoned LRA area. Therefore, the project would not result in exposure of people or structures to significant risk of loss injury or death as a result of wildland fire hazards.

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<sup>15</sup> California Department of Toxic Substances. 2022. EnviroStor website. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1328+sperber+road%2C+el+centro%2C+ca>. Accessed December 2022.

<sup>16</sup> California Department of Forestry and Fire Protection (CALFIRE). 2007. Fire Hazard Severity Zone Maps. [https://osfm.fire.ca.gov/media/6577/fhszl06\\_1\\_map13.jpg](https://osfm.fire.ca.gov/media/6577/fhszl06_1_map13.jpg). Accessed December 2022.

- h. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?*

Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall not be the following minimum distances from the edge of a high-voltage power line easement: 100 feet for 50-133 kilovolt (kV) lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. The project site is surrounded by overhead distribution lines to the east; however, the project site is not located within 100 feet from the edge of an easement for a 50-133 kV line; 150 feet from the edge of an easement for a 220-230kV line; or 350 feet from the edge of an easement for a 500-550kV line. Therefore, there are no CDE setback requirements for the project site. This impact would be less than significant.

- i. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?*

Based on an online records search of the National Pipeline Mapping System,<sup>17</sup> no high-pressure gas or oil pipelines occur within 1,500 feet of the project site. The project site does not contain an aboveground water tank. For these reasons, construction and operation of the project would result in a less than significant impact with regard to safety hazards.

- j. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? (Does not apply to school sites approved by CDE prior to January 1, 1997.)*

The project site is designated as Public on the El Centro General Plan Land Use Map. Parcels to the west of the project site are designated as agriculture land uses; however, the project site is separated by an agricultural canal, which would provide a safety buffer between the proposed use and the existing agricultural uses. This impact would be less than significant.

- k. Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?*

According to the DTSC Envirostor website,<sup>18</sup> the proposed project is located on a site that is included on a list of hazardous materials sites (school investigation site). According to the DTSC website, no solid waste disposal facilities were located at the project site. There would be no impact related to solid waste disposal facilities operating on the project site.

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<sup>17</sup> National Pipeline Mapping System. 2019. Public Viewer.  
<https://pvnpm.phmsa.dot.gov/PublicViewer/> Accessed December 2022.

<sup>18</sup> California Department of Toxic Substances. 2022. EnviroStor website.  
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1328+sperber+road%2C+el+centro%2C+ca>. Accessed December 2022.

*1. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?*

No response action is necessary. No impact would occur.

### 3.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

#### 3.10.1 Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Development of a property may result in two types of water quality impacts: (1) short-term impacts due to construction related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics. Runoff may carry on-site surface pollutants to water bodies such as lakes, streams, and rivers that ultimately drain to the ocean. Projects that increase urban runoff may indirectly increase local and regional flooding intensity and erosion.

Non-stormwater discharges could result from activities such as discharge or accidental spills of hazardous substances such as fuels, oils, petroleum hydrocarbons, concrete, paints, solvents, cleaners, or other construction materials. Erosion and construction-related wastes have the potential to temporarily degrade existing water quality and beneficial uses by altering the dissolved oxygen content, temperature, pH, suspended sediment and turbidity levels, or nutrient content, or by causing toxic effects in the aquatic environment. Therefore, if uncontrolled, project-related construction activities could violate water quality standards.

Construction site stormwater management is enforced by the Colorado River Basin RWQCB in accordance with the State's Water Quality Order 2012-0006-DWQ/NPDES General Permit No. CAS000002 (General Construction Permit). The RWQCB requires an NPDES permit for construction activities that disturb 1 or more acres. The ICOE would be required to comply with the Construction General Permit because project-related construction activities would result in soil disturbances of at least 1 acre of total land area. **Mitigation Measure HYD-1** requires the preparation and implementation of a SWPPP to comply with the Construction General Permit requirements.

Additionally, the proposed project would be subject to the requirements of the National Pollutant Discharge Elimination System General Permit for the City of El Centro (Municipal Permit), State Water Resources Control Board Order No. 2013-0001-DWG. The project would be required to comply with the City's storm water requirements (Ordinance Chapter 22, Article VII), which consist of the City's Jurisdictional Runoff Management Program<sup>19</sup> and the associated City of El Centro Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects<sup>20</sup>.

With implementation of **Mitigation Measure HYD-1**, the project would not violate any water quality standards or waste discharge requirements (WDRs) during the construction period, and impacts would be less than significant.

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

The proposed project does not propose the installation of any water wells that would directly extract groundwater. Specifically, water service would be provided by the City of El Centro. Additionally, the increase in impervious surface cover that would occur with the proposed project would be negligible and would not reduce the amount of water percolating down into the ground. Therefore, impacts to groundwater supplies or recharge would be less than significant.

*c. Would the project 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:*

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

The proposed project would not alter the course of a stream or river. However, grading and development of the project site with the school buildings, parking lot, and walkways would substantially and permanently alter the on-site drainage pattern thereby increasing the potential for on-site and off-site erosion and sedimentation and increasing the amount of surface runoff through the addition of impervious surfaces.

<sup>19</sup> City of El Centro. 2015. Jurisdictional Runoff Management Program. December.

<sup>20</sup> City of El Centro. 2018. Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects. June.

Development of impervious surfaces incrementally reduces the amount of natural soil surfaces available for the infiltration of rainfall and runoff. As a result, the frequency, volume, and flow rate of stormwater runoff increases, potentially resulting in on-site flooding, downstream flooding, or potentially contributing to runoff that exceeds the capacity of the existing drainage system in the vicinity of the project site. Post-development, the project site would be covered by impervious surfaces in the form of building foundations, hardcourt areas and walkways. Landscaped areas and sports fields would be undeveloped and would provide infiltration of stormwater and reduce the volume of stormwater flowing off-site.

While the proposed amount of impervious surface would increase with the development of the proposed project, the drainage facilities that serve the project site would continue to provide storm drainage capacity for the project. Impacts associated with erosion or siltation would be less than significant.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

See response 3.10.1(c)(i).

- 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*

The proposed project would be required to comply with the City's storm water regulations during construction and after construction, including measures to control runoff rates and control pollution in runoff. During construction, future development would be required to comply with the Construction General Permit Order 2009-0009-DWQ, and the associated requirement to prepare a SWPPP with BMPs. In addition, project operations would be required to comply with the National Pollutant Discharge Elimination System and the City's storm water protection program. Compliance with these regulations ensure that storm water runoff rates are controlled to existing conditions levels, and, therefore, the project would not exceed the capacity of the existing or planned storm water drainage systems. Therefore, project impacts would be less than significant.

- iv. Impede or redirect flood flows?*

See responses to 3.10.1(a) and 3.10.1(c)(i), above. Project development would be required to comply with all City storm water quality standards during and after construction. Therefore, impacts would be less than significant.

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The proposed project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain. In addition, the project site is generally level and is not immediately adjacent to any hillsides. As such, the risk from flooding would be low. Furthermore, no enclosed bodies of water are in close enough proximity that would create a

potential risk for seiche or a tsunami at the project site. Therefore, there would be no impact related to potential hazards from inundation from flood, tsunami, or seiche.

*e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Pollutants of concern during construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. These pollutants may percolate to shallow groundwater from construction activities. However, required compliance with State and local regulations regarding stormwater and dewatering during construction would ensure that the proposed project would result in less-than-significant impacts to water quality during construction.

During operation of the proposed project, stormwater runoff would drain into the City's drainage system. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact is considered less than significant.

### **3.10.2 Mitigation Measures**

**Mitigation Measure HYD-1:** Prior to ground-disturbing activities, the ICOE shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies best management practices (BMPs) with the intent of keeping all products of erosion from moving offsite. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed man-made facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. Additionally, the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of BMPs). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended BMPs for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly;
- Protecting any existing storm drain inlets and stabilizing disturbed areas;
- Implementing erosion controls;
- Properly managing construction materials; and
- Managing waste, aggressively controlling litter, and implementing sediment controls.

### 3.11 LAND USE AND PLANNING

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

#### 3.11.1 Impact Analysis

a. *Would the project physically divide an established community?*

The project site is designated as Public on the City of El Centro General Plan Land Use Map and the proposed use would be consistent with the General Plan. Therefore, the proposed project would not divide an established community. No impacts would result from project implementation, and no mitigation measures are necessary.

b. *Would the project 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?*

The project site is zoned as Limited Use and identified as a Public use in the City of El Centro General Plan. The project does not propose to change the site’s existing zoning or land use designation. The proposed project would comply with applicable land use requirements, policies, zoning, and development standards as required by California law for school districts, and adhere to other applicable state codes and regulations. The project would not conflict with any existing state, regional, county, or local laws, policies, regulations, plans or guidelines. Therefore, this impact would be less than significant.

### 3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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"/>

#### 3.12.1 Impact Analysis

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No known mineral resources exist on the project site or surrounding properties. Additionally, the project site is not within a mineral resource zone as designated by the California Department of Conservation’s Division of Mine Reclamation, Mineral Land Classification map<sup>21</sup>. Therefore, implementation of the project would not result in loss of availability of a known mineral resource. No impact would occur.

- b. *Would the project 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?*

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

<sup>21</sup> California Department of Conservation. 2022b. Mineral Land Classification. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed December 2022.

### 3.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 2 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"/>
d. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.13.1 Impact Analysis

- a. *Would the project result in 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?*

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent

continuous sound level ( $L_{eq}$ ) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the  $L_{eq}$ , the community noise equivalent level (CNEL), and the day-night average level ( $L_{dn}$ ) based on dBA. CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly  $L_{eq}$  for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours).  $L_{dn}$  is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and  $L_{dn}$  are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, the City of El Centro.

While the project site and parcels north of the project site are located within the city of El Centro, the parcels to the east, south, and west of the project site are located within Imperial County. Construction noise has been evaluated against criteria established by both the City and the County.

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

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

**Short-Term (Construction) Noise Impacts.** Project construction would result in short-term noise impacts on the nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. The level and types of noise impacts that would occur during construction are described below.

Short-term noise impacts would occur during grading and site preparation activities. Table 3 lists typical construction equipment noise levels ( $L_{max}$ ) recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, obtained from the Federal Highway Administration (FHWA) Roadway Construction Noise Model. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would no longer occur once construction of the project is completed.

**Table 6: Typical Construction Equipment Noise Levels**

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L <sub>max</sub> ) at 50 Feet <sup>1</sup>
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Pick-up Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Welder	40	73

Source: Roadway Construction Noise Model (FHWA 2006).

Note: Noise levels reported in this table are rounded to the nearest whole number.

<sup>1</sup> Maximum noise levels were developed based on Spec 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.

L<sub>max</sub> = maximum instantaneous sound level

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the sites, which would incrementally increase noise levels on roads leading to the sites. As shown in Table 3, there would be a single-event noise exposure potential at a maximum level of 55 dBA L<sub>max</sub> with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during grading and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Typical maximum noise levels range up to 87 dBA L<sub>max</sub> at 50 feet during the noisiest construction phases. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these

types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

This analysis assumes that a bulldozer, dump truck, and backhoe would be operating simultaneously during construction of the project. Based on the typical construction equipment noise levels shown in Table 3, noise levels associated with a bulldozer, dump truck, and backhoe operating simultaneously would be approximately 88 dBA  $L_{max}$  at 50 feet.

The nearest sensitive receptors are residential uses that are located approximately 1,000 feet north of the project site and beyond area roadways. Given the distance to the nearest sensitive receptors and that construction activities would occur between the hours of 7:00 a.m. and 5:00 p.m. Monday through Saturday as permitted by the City of El Centro and Imperial County, and the use of mufflers or sound dissipative devices for internal combustion engines is required to reduce noise levels associated with construction activities, this impact would be less than significant.

**Operational Noise Impacts.** A significant impact would occur if the project would exceed established standards, including resulting in a substantial permanent increase in ambient exterior noise levels above levels existing without the project. In acoustics, every doubling of an equal sound energy would result in a 3 dBA increase in combined noise level (an increase of 3 dBA represents the lowest noise increase that is perceptible by humans outside of a laboratory environment). For the purposes of this analysis, an increase of 5 or more dBA would be significant.

Permanent increases in the ambient noise level in the project vicinity would result from vehicle noise associated with school traffic and maintenance activities. However, it should be noted that the proposed project would expand and modernize the existing campus and noise levels are expected to be consistent with existing conditions.

The proposed school would be exposed to noise levels associated with traffic on W. McCabe Road and Sperber Road. Given the distance of the proposed classrooms from the centerline and the volumes of traffic on W. McCabe Road and Sperber Road, traffic noise from adjacent roads would have a less-than-significant impact on the school.

### **Landscape Maintenance**

Mowers, blowers, weed cutters, and tractors would be operated onsite to maintain the project landscaping. Landscape maintenance would occur between the hours of 7:00 a.m. to 5:00 p.m. Monday through Saturday, consistent with the City and County requirements; therefore, this impact would be less than significant.

*b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction activities that might expose persons to excessive ground borne vibration or ground borne noise have the potential to cause a significant impact. Ground borne vibration information related to construction/heavy equipment activities has been collected by the California Department of Transportation (Caltrans). The Caltrans data indicates that

transient vibrations (such as from demolition activity) with a peak particle velocity (PPV) of approximately 0.035 inches per second may be characterized as barely perceptible, and vibration levels up to 0.25 inches per second may be characterized as distinctly perceptible<sup>22</sup>. Caltrans (2013) uses a damage threshold of 0.2 inches per second PPV for conventional buildings.

Ground borne vibration is typically attenuated over relatively short distances. With the anticipated construction equipment, construction-related vibration levels would be approximately 0.127 inches per second PPV at 25 feet from the construction area (assuming simultaneous operation of a caisson drill, a jackhammer, and a small bulldozer). At 25 feet, this vibration would be above the threshold of “barely perceptible” level of 0.035 inches per second PPV; however, the nearest residence is approximately 1,000 feet from the nearest construction area. At a distance of 1,000 feet, the vibration level is not anticipated to exceed the distinctly perceptible level of 0.25 inches per second PPV<sup>23</sup>. The expected vibration level at the residential buildings is also expected to be below the Caltrans damage threshold for conventional buildings. Therefore, impacts related to ground borne vibration would be less than significant.

*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 2 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?*

The nearest public or public use airport to the project area is the Imperial County Airport, which is approximately 5 miles north of the project area. Additionally, the NAF El Centro is approximately 7 miles northwest of the project site. There would be no impact associated with proximity to a public airport and/or exposure of people residing or working in the area to noise from the airport.

*d. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?*

See response 3.13.1(a). The school would be exposed to noise levels associated with traffic on West McCabe Road and Sperber Road. The nearest proposed classroom would be approximately 500 feet from the centerline of West McCabe Road and 100 feet from the centerline of Sperber Road (as measured from the nearest proposed building). Given the distance of the site from the centerline and the volumes of traffic on West McCabe Road (approximately 5,000 vehicles per day) and South Clark Road (approximately 2,000 vehicles per day),<sup>24</sup> traffic noise from adjacent roads would have a less-than-significant impact on the school.

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<sup>22</sup> Caltrans (California Department of Transportation). 2013. *Transportation- and Construction-Induced Vibration Guidance Manual*. Sacramento, California: Caltrans Noise, Vibration and Hazardous Waste Management Office. September 2013.

<sup>23</sup> Ibid.

<sup>24</sup> Linscott Law & Greenspan Engineers. 2023. Transportation Analysis Imperial Valley Center for Exceptional Children. February 24.

### 3.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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"/>

#### 3.14.1 Impact Analysis

- a. *Would the project 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)?*

The project does not include the construction of dwellings or an increase in the resident population of the surrounding area. Project implementation would meet the demands of projected population growth in the project area by providing accommodation for students. As such, the project would have no impact on direct or indirect population growth.

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site is currently agricultural land; therefore, no dwelling units would be displaced from project implementation. The project would have no impact.

### 3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the site promote joint use of parks, libraries, museums, and other public services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.15.1 Impact Analysis

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

i. *Fire protection?*

The proposed project would be served by the City of El Centro Fire Department. The project would incorporate California Fire Code requirements into project designs. These standards address access road length, dimensions, and finished surfaces for firefighting equipment; fire hydrant placement; fire flow availability and requirements; and plan submittal requirements. In addition, the California Fire Code requires that every public or private school building having an occupant load of 50 or more students or more than one classroom have an automatic fire alarm system using the California Fire Code Signal outlined in the California Education Code (Sections 32000–32004). Furthermore, the California Education Code requires new schools to install an automatic fire sprinkler system (Section 17074.52).

Incorporation of all California Fire Code requirements into project designs would reduce the dependence on fire department equipment and personnel by reducing fire hazards. Additionally, the ICOE would be required to pay fire impact fees pursuant to the City’s Municipal Code Section 20-102 to offset any impacts. Therefore, the proposed project would not affect the Fire Department’s response times or other performance objectives and would not cause in the construction of new or expansion of existing fire protection

facilities that result in environmental effects. The impacts on fire protection services would be less than significant.

*ii. Police protection?*

The project would be served by the El Centro Police Department. The site would be lit at night for security purposes as a way to discourage crime. It is not expected that the proposed project would substantially increase the El Centro Police Department's calls for service. Additionally, the ICOE would be required to pay police impact fees pursuant to the City's Municipal Code Section 20-102 to offset any impacts. Therefore, the proposed project would not affect the El Centro Police Department's performance objectives and would not cause the construction of new or expansion of existing police protection facilities that result in environmental effects. Therefore, the project would have a less than significant impact.

*iii. Schools?*

The project would not increase the demand for or cause a shortfall of school services or facilities. Rather, the proposed project would continue to accommodate students living in the attendance area. Therefore, the project would have no impact.

*iv. Parks?*

The proposed project does not include the construction of structures that would increase the population in the area or that would generate a higher demand for parks or other public facilities. Therefore, the demand for parks for the project would be the same as under existing conditions. No impact to parks would occur.

*v. Other public facilities?*

The proposed project does not include the construction of structures that would increase the population in the area or that would generate a higher demand for other public facilities. Therefore, the demand for public facilities for the project would be the same as under existing conditions. No impact to public facilities would occur.

*b. Does the site promote joint use of parks, libraries, museums, and other public services?*

The Civic Center Act, as defined in the State of California Education Code Sections 38130-38139, describes the uses of school facilities, including all buildings and grounds for public purposes, and the fees that may be assessed. Section 38131(b)(1) states:

“(b) The governing board of any school district may grant the use of school facilities or grounds as a civic center upon the terms and conditions the board deems proper, subject to the limitations, requirements, and restrictions set forth in this article, for any of the following purposes:(1) Public, literary, scientific, recreational, educational, or public agency meetings . . .(6) Supervised recreational activities including, but not limited to, sports league activities for youths that are arranged for and supervised by entities,

including religious organizations or churches, and in which youths may participate regardless of religious belief or denomination”<sup>25</sup>.

The proposed site would be available for use per Civic Center Act requirements. Therefore, the project does not preclude the joint use of playground equipment located onsite or the use of buildings for public agency meetings. This impact would be less than significant.

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<sup>25</sup> California Education Code. 1996. Section 38131(b)(1).

### 3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>

#### 3.16.1 Impact Analysis

- 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?*

The increase in use of recreational facilities is generally a result of population growth. The proposed project includes the development of school facilities including a playground. The project would serve the region’s existing population and would not induce population growth. Therefore, there would be no impact on existing neighborhood or regional parks and facilities.

- 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?*

The project would not directly or indirectly result in population and housing growth. Therefore, it would not impact existing neighborhood and regional parks or other recreational facilities as a result of substantial physical deterioration of the facilities. Furthermore, the project does include the development of an onsite playground, which would not require the construction or expansion of offsite recreational facilities that might have an adverse physical effect on the environmental. No impact would occur.

### 3.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" 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"/>
e. Is the proposed school site within 1,500 feet of a railroad track easement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.17.1 Impact Analysis

a. *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

A Transportation Analysis (TA) dated February 24, 2023, was prepared by LLG for the proposed project and is included as Appendix B.

As described in the TA (2023), the project is expected to generate a total of 666 weekday daily trips, with 145 trips in the weekday AM peak hour (80 inbound, 64 outbound) and 134 trips in the weekday PM peak hour (62 inbound, 72 outbound).

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

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

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process that changes the methodology of a transportation impact analysis as part of CEQA requirements. SB 743 directed the California Office of Planning and Research to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis.

Rather, vehicle miles traveled (VMT), or other measures that promote “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses,” are now be used as the basis for determining significant transportation impacts in the State.

The majority of new project-related trips would be attributed to buses (70 percent); however, the trips that would travel to/from the school are not new trips to the street system. This is because the children who would attend IVCEC already attend other schools. A List of these schools is provided below.

- IVCEC (Existing Facility)
- Brawley Elementary
- Brawley Union High
- Heber Elementary
- El Centro, Elementary
- Seeley Union Elementary
- Holtville Unified
- Imperial Unified
- Central Union High
- Westmorland Union Elementary
- McCabe Union Elementary
- Calexico Unified

Because the project would consolidate the children at one location as opposed to numerous area schools, the project would not have a significant VMT impact. Based on the previously summarized standards, the proposed project would result in a less-than-significant VMT impact.

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

The proposed project would have two access driveways to the school. One access driveway would be located on the east side from Sperber Road. This access would lead to the visitor and staff parking lot. The access driveway from Betty Jo McNeece Loop would provide access for visitor and staff parking as well as a bus loop. This circular driveway access would be designed to allow for a safe and smooth flow of traffic while dropping off and picking up students.

There are no incompatible uses, including farm operations, in the vicinity that would cause traffic hazards. Additionally, the school would include an internal pedestrian pathway system. School development would not create barriers to pedestrians or bicyclists.

The proposed project would install stop signs at the Betty Jo McNeece Loop/Sperber Road and site the northern driveway of Parking Lot B at least 100 feet south of Betty Jo McNeece Loop. With the design features, impacts related to traffic safety hazards would be less than significant

*d. Would the project result in inadequate emergency access?*

Project parking lots and vehicular routes, including emergency vehicle access, would be provided near all proposed buildings on-site, according to the proposed project site plan. Emergency access would not be adversely affected as a result of the project.

Construction of the project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to the site as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the site may require oversized vehicles that may travel at slower speeds than existing traffic, thereby causing minor delays on local roadways on a temporary, intermittent basis.

Lane closures are not anticipated, and no off-site roadway improvements would be required that would have the potential to interrupt area circulation or redirect traffic. As such, project construction is not anticipated to substantially disrupt area traffic or cause a significant increase in daily traffic on area roadways or at local intersections.

All proposed access routes would be designed consistent with City design standards for emergency access and would adequately accommodate the on-site maneuvering of emergency vehicles. The project is therefore not anticipated to interfere with emergency access. Impacts would be less than significant.

*e. Is the proposed school site within 1,500 feet of a railroad track easement?*

As discussed in response 3.3.1(f), the project area is located approximately 1.8 miles west of the existing Union Pacific line. The project site is not located within 1,500 feet of a railroad track easement. No impact would occur.

*f. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?*

The primary access to the project site would be provided on Sperber Road, located along the eastern boundary of the site, and Betty Jo McNeece Loop, located along the northern boundary of the site. As no changes to existing streets are proposed aside for the installation of stop signs at the Betty Jo McNeece Loop/Sperber Road intersection and the location of access driveways would be designed to conform with visibility requirements, impacts related to access and peripheral visibility would be less than significant.

*g. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?*

Currently, no sidewalks exist in the vicinity of the proposed project site. The proposed project has been designed to accommodate safe pedestrian access; therefore, this impact would be less than significant.

### 3.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.18.1 Impact Analysis

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

i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*

The ICOE requested a Sacred Lands Inventory on file with the NAHC, which concluded negative results (i.e., no sacred lands were identified in the project site). Based on the list provided by the NAHC, the ICOE notified 22 Native American tribal representatives consistent with AB 52 requirements; no responses have been received. However, in the unlikely event that unrecorded resources are discovered during construction activities, compliance with the California Public Resources Code would reduce this potential impact to less than significant.

ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth 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.*

The ICOE requested a Sacred Lands Inventory on file with the NAHC, which concluded negative results (i.e., no sacred lands were identified in the project site). Based on the list provided by the NAHC, the ICOE notified 22 Native American tribal representatives consistent with AB 52 requirements; no responses have been received. However, in the unlikely event that unrecorded resources are discovered during construction activities, compliance with the California Public Resources Code would reduce this potential impact to less than significant.

### 3.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.19.1 Impact Analysis

- a. *Would the project 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?*

The proposed project would be serviced by existing water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities and would not require the relocation or construction of new or expanded facilities. This impact would be less than significant.

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

The City of El Centro receives its water supply from the Imperial Irrigation District (IID). The IID has adopted an Interim Water Supply Policy (IWSP)<sup>26</sup> for new nonagricultural projects. The IWSP sets aside 25,000 acre-feet of water per year of Colorado River water supply to serve IWSP. The project site would also be serviced by the City of El Centro's treated water supply. As stated above, the City's water is provided by the IID. Per the Water System

<sup>26</sup> Imperial Irrigation District. 2021. Interim Water Supply Policy. <https://www.iid.com/home/showdocument?id=11715>. Accessed December 2022.

Master Plan<sup>27</sup>, the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year. The project is not anticipated to require a need for additional entitlements. Thus, the City would have enough water supplies available to serve the site. Considering the above-mentioned factors, the project would have sufficient water supplies, and a less than significant impact would occur.

*c. Would the project 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?*

See response 3.19.1(a). Impacts would be less than significant.

*d. Would the project 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?*

Project construction would involve site clearing and the generation of various construction wastes, including scrap lumber, scrap finishing materials, various scrap metals, and other recyclable and nonrecyclable construction-related wastes. The CalGreen Code (Title 24, Part 11 of the California Code of Regulations) requires all construction contractors to reduce construction waste and demolition debris by 65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both. In addition, the CalGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

According to the Draft Mitigated Negative Declaration for the Monte Vista Regional Soccer and Wellness Park Project<sup>28</sup>, solid waste service to the site is provided by CR&R Waste Services, who has a material recovery, transfer, and disposal center located in the City (599 East Main Street). CR&R owns and operates the South Yuma County Landfill (SYCL) in Arizona and currently transports all waste from El Centro to the SYCL. No waste is disposed in Imperial County. The City of El Centro has renewed its contract with CR&R through 2027. The total design/permitted capacity for the SYCL is 46,825,430 cubic yards. Currently, the landfill is operating in Phase I of its development, which has a design/permitted capacity of 19,305,000 cubic yards and as of 2018 had more than 14 million cubic yards of remaining capacity.

The project would comply with all statutes and regulations related to solid waste. Compliance with the CalGreen Code and AB 1826 would ensure that sufficient landfill capacity would be

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<sup>27</sup> Carollo Engineers. 2008. Sewer Master Plan City of El Centro.

<sup>28</sup> City of El Centro. 2020b. Draft Mitigated Negative Declaration for the Monte Vista Regional Soccer and Wellness Park Project, El Centro, California. January 11.

available to accommodate solid-waste disposal needs for future development. Therefore, the project would have a less-than-significant impact.

*e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The California Integrated Waste Management Act of 1989 (AB 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated, by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties throughout California to divert a minimum of 25 percent of the solid waste sent to landfills by 1995 and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy using new integrated solid waste management practices.

Section 5.408 of the 2019 California Green Building Standards Code (Title 24, California Code of Regulations, Part 11) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Any businesses, including public entities, generating four cubic yards or more of commercial solid waste per week, must arrange recycling services.

The project would comply with AB 939 (Zero Waste program) and other applicable local, State, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills is reduced in accordance with existing regulations. Therefore, this impact would be less than significant.

### 3.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.20.1 Impact Analysis

- a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources.

According to the CALFIRE Very High Fire Hazard Severity Zone (VHFHSZ) Map for Imperial County, the project site is not located in a high risk area and rather is located in an unzoned Local Responsibility area. Therefore, the proposed project would not expose people to significant risk of loss, injury, or death due to wildland fires and this impact would be less than significant.

As discussed in response 3.9.1(f), implementation of the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan and would not alter any of the streets within, or adjacent to, the project site. Therefore, implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

- b. Would the project, 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?*

The project site is not located in or near a VHFHSZ nor is it located in or near an SRA. Implementation of the proposed project would not exacerbate wildfire risks due to slope and prevailing winds, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. As a result, a less-than-significant impact would occur, and no mitigation would be required.

- c. Would the project 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?*

The proposed project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. No impact would occur.

- d. Would the project 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?*

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. Because the proposed project site is level, the proposed project would not expose people or structures to potential substantial adverse effects associated with landslides. Further, the proposed project site is not located in or near a VHFHSZ nor is it located in or near a SRA. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As a result, a less-than-significant impact would occur, and no mitigation would be required.

### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

#### 3.21.1 Impact Analysis

- 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?*

Implementation of the mitigation measures recommended in this Initial Study/Mitigated Negative Declaration (IS/MND) would ensure that construction and operation of the proposed project would not substantially degrade the quality of the environment; reduce the habitat, population, or range of a plant or animal species; or eliminate important examples of California history or prehistory.

- 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)?*

The potential impacts of the proposed project are individually limited and are not cumulatively considerable. Implementation of mitigation measures recommended in this report would reduce potentially significant impacts that could become cumulatively considerable.

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

The proposed project would be constructed and operated in accordance with all applicable regulations governing hazardous materials, noise, and geotechnical considerations. Because all potentially significant impacts of the proposed project are expected to be mitigated to less-than-significant levels, it is unlikely that implementation of the proposed project would cause substantial adverse effects on human beings. As a result, less-than-significant impacts would occur with implementation of the recommended mitigation measures.

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# APPENDIX A CALEEMOD REPORT

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# Imperial County Center for Exceptional Children Summary Report

## Table of Contents

### 1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.4. Operations Emissions Compared Against Thresholds

### 6. Climate Risk Detailed Report

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

### 7. Health and Equity Details

7.3. Overall Health & Equity Scores

7.5. Evaluation Scorecard

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Imperial County Center for Exceptional Children
Lead Agency	Imperial County Office of Education
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40
Precipitation (days)	4.80
Location	Sperber Rd, California 92243, USA
County	Imperial
City	Unincorporated
Air District	Imperial County APCD
Air Basin	Salton Sea
TAZ	5608
EDFZ	19
Electric Utility	Imperial Irrigation District
Gas Utility	Southern California Gas

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Day-Care Center	30.0	1000sqft	0.69	30,000	—	—	—	—
Elementary School	10.0	1000sqft	0.23	10,000	—	—	—	—
High School	23.0	1000sqft	0.53	23,000	—	—	—	—

Parking Lot	104	Space	0.94	0.00	—	—	—	—
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### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-3	Use Local Construction Contractors
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Construction	C-13	Use Low-VOC Paints for Construction

\* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.18	89.5	17.1	18.6	0.02	0.78	168	169	0.72	16.8	17.5	—	2,755	2,755	0.11	0.08	2.60	2,783
Mit.	2.17	31.1	17.1	18.1	0.02	0.78	109	110	0.72	10.9	11.6	—	2,625	2,625	0.11	0.07	2.00	2,635
% Reduced	< 0.5%	65%	< 0.5%	3%	—	—	35%	35%	—	35%	34%	—	5%	5%	2%	5%	23%	5%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.60	1.35	11.0	12.6	0.02	0.45	86.8	87.3	0.42	8.74	9.16	—	2,689	2,689	0.10	0.08	0.07	2,714

Mit.	1.58	1.33	10.9	12.0	0.02	0.45	61.7	62.2	0.42	6.21	6.63	—	2,564	2,564	0.10	0.07	0.05	2,588
% Reduced	1%	1%	1%	5%	—	—	29%	29%	—	29%	28%	—	5%	5%	4%	5%	23%	5%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.63	3.00	4.29	5.32	0.01	0.17	35.3	35.5	0.16	3.55	3.71	—	1,098	1,098	0.04	0.03	0.43	1,109
Mit.	0.63	1.39	4.26	5.02	0.01	0.17	25.0	25.2	0.16	2.52	2.67	—	1,044	1,044	0.04	0.03	0.33	1,054
% Reduced	1%	54%	1%	6%	—	—	29%	29%	—	29%	28%	—	5%	5%	4%	5%	23%	5%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.12	0.55	0.78	0.97	< 0.005	0.03	6.44	6.48	0.03	0.65	0.68	—	182	182	0.01	< 0.005	0.07	184
Mit.	0.11	0.25	0.78	0.92	< 0.005	0.03	4.56	4.60	0.03	0.46	0.49	—	173	173	0.01	< 0.005	0.05	175
% Reduced	1%	54%	1%	6%	—	—	29%	29%	—	29%	28%	—	5%	5%	4%	5%	23%	5%

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.43	4.92	0.96	7.82	< 0.005	0.03	0.00	0.03	0.03	0.00	0.03	48.6	—	—	—	—	0.24	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.16	3.69	0.94	5.74	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	48.6	—	—	—	—	0.24	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.27	1.83	0.26	1.56	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	48.6	—	—	—	—	0.24	—

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.33	0.05	0.29	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	8.05	—	—	—	—	0.04

## 6. Climate Risk Detailed Report

### 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

### 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A

Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 7. Health and Equity Details

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	89.0
Healthy Places Index Score for Project Location (b)	22.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	El Centro Corridor

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

## APPENDIX B TRAFFIC IMPACT ANALYSIS

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TRANSPORTATION ANALYSIS  
**IMPERIAL VALLEY CENTER FOR  
EXCEPTIONAL CHILDREN**  
El Centro, California  
February 24, 2023

LLG Ref. 3-22-3693

*Prepared by:*  
Jose Nunez Jr  
Transportation Planner II

*Under the Supervision of:*  
John Boarman, P. E.  
Principal

# TABLE OF CONTENTS

SECTION	PAGE
<b>1.0 Project and Study Description</b> .....	<b>1</b>
1.1 Project Location and Vicinity Map.....	1
1.2 Project Size and Description.....	1
1.3 Project Access.....	2
<b>2.0 Methodology and Thresholds</b> .....	<b>6</b>
2.1 Study Area .....	6
2.2 Methodology .....	6
2.2.1 Signalized Intersections .....	6
2.2.2 Unsignalized Intersections.....	9
2.2.3 Street Segments.....	9
2.3 Proposed Project Opening Year and Analysis Scenarios .....	9
<b>3.0 Substantial Effect Criteria</b> .....	<b>11</b>
<b>4.0 Existing Conditions</b> .....	<b>12</b>
4.1 Existing Transportation Conditions .....	12
4.2 Imperial Avenue Extension.....	13
4.3 Existing Traffic Volumes – AM and PM Peak Hour and ADT.....	13
4.4 Existing Intersection Levels of Service .....	13
4.5 Existing Segment Levels of Service .....	13
<b>5.0 Project Traffic</b> .....	<b>19</b>
5.1 Trip Generation.....	19
5.2 Trip Distribution and Assignment .....	19
<b>6.0 Cumulative Traffic Volumes</b> .....	<b>24</b>
<b>7.0 Near-Term Analysis</b> .....	<b>27</b>
7.1 Existing + Project Analysis.....	27
7.2 Intersection Level of Service .....	27
7.3 Segment Levels of Service.....	27
7.4 Identification of Intersection Deficiencies and Improvements.....	27
7.5 Existing + Project + Cumulative Projects Analysis.....	27
7.5.1 Intersection Level of Service .....	27
7.5.2 Segment Levels of Service.....	27
7.6 Identification of Intersection Deficiencies and Improvements.....	27
<b>8.0 Site Access Assessment</b> .....	<b>30</b>

<b>9.0 Active Transportation Conditions.....</b>	<b>31</b>
9.1 Pedestrian Conditions .....	31
9.2 Bicycle Conditions.....	31
9.3 Transit Conditions.....	31
<b>10.0 Project VMT Analysis .....</b>	<b>32</b>
<b>11.0 Conclusions.....</b>	<b>33</b>

## APPENDICES

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### APPENDIX

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- A. Intersection Manual and Segment Count Sheets and Copies of Signal Timing Plans from the City of El Centro
- B. Synchro Intersection Analysis Worksheets
- C. Cumulative Project Data
- D. Transit Bus Routes

## LIST OF FIGURES

SECTION—FIGURE #	PAGE
Figure 1–1 Project Vicinity Map.....	3
Figure 1–2 Project Area Map.....	4
Figure 1–3 Project Site Plan.....	5
Figure 4–1 Existing Conditions Diagram.....	17
Figure 4–2 Existing Traffic Volumes.....	18
Figure 5–1 Project Trip Distribution.....	21
Figure 5–2 Project Traffic Assignment.....	22
Figure 5–3 Existing + Project Traffic Assignment.....	23
Figure 6–1 Cumulative Projects Traffic Volumes.....	25
Figure 6–2 Existing + Project + Cumulative Projects Traffic Volumes.....	26

## LIST OF TABLES

SECTION—TABLE #	PAGE
Table 2–1 Intersection Level of Service Descriptions.....	8
Table 2–2 Intersection Level of Service (LOS) & Delay Ranges.....	8
Table 4-1 Existing Traffic Volumes.....	14
Table 4–2 Existing Intersection Operations.....	15
Table 4–3 Existing Segment Operations.....	16
Table 5-1 Trip Generation Summary.....	20
Table 7–1 Near-Term Intersection Operations.....	28
Table 7–2 Existing + Project +Cumulative Projects Operations.....	29

TRANSPORTATION ANALYSIS  
**IMPERIAL VALLEY CENTER FOR EXCEPTIONAL CHILDREN**  
Imperial County, California  
February 24, 2023

## 1.0 PROJECT AND STUDY DESCRIPTION

Linscott, Law and Greenspan, Engineers (LLG) has prepared this Transportation Impact Analysis including Vehicle Miles Traveled (VMT) Analysis and Local Mobility Analysis (LMA) to assess the impacts to the street system as a result of the proposed project located on the southwest corner of the Sperber Road and Betty Jo Mc Neece Loop intersection in the County of Imperial.

The traffic analysis presented in this report includes the following:

- Section 1.* Project and Study Description
- Section 2.* Methodology and Thresholds
- Section 3.* Substantial Effect Criteria
- Section 4.* Existing Conditions
- Section 5.* Project Traffic
- Section 6.* Cumulative Projects Traffic Volumes
- Section 7.* Near-Term Analysis
- Section 8.* Site Access Assessment
- Section 9.* Active Transportation Assessment
- Section 10.* Project VMT Analysis
- Section 11.* Conclusions

### 1.1 Project Location and Vicinity Map

The site is bounded by Sperber Road to the east and south of Betty Jo Mc Neece Loop in the County of Imperial. As part of the project Betty Jo Mc Neece Loop would be extended west of Sperber Road.

**Figure 1-1** is the Vicinity Map depicting the Project location and the vicinity. **Figure 1-2** is the Project Area Map.

### 1.2 Project Size and Description

The project comprises 6.95 acres of site with a 43,433sf primary building housing the reception, clerical areas, staff restrooms, offices, and visitor restrooms. A designated place for California Children Services, resource specialists, and therapy areas. A Multipurpose Therapy room with a warming kitchen and eight classrooms for the severely handicapped population, and five classrooms for infant preschool.

Buildings 2 and 4 are modular buildings consisting of four preschool classrooms totaling 4,580 sf each.

Building 3 is a modular building housing eight classrooms with an area of 9,190 sf and an area for future expansion of four additional classrooms.

The parking lot consists of a bus drop-off, parents, visitor, and staff parking lot, a playground area, fire lane access, landscape and hardscape areas.

*Figure 1–3 details the Project’s Site Plan.*

### **1.3 Project Access**

The following school access is proposed:

The main access to the site will be via the extension of Betty Jo Mc Neece Loop. Two driveways will be provided and the parking will serve staff and parent parking. It will also serve as the main parent drop off area and the bus drop off area. The west driveway will be one-way inbound and the east driveway would be one-way outbound. A smaller parking area will be served via Sperber Road.

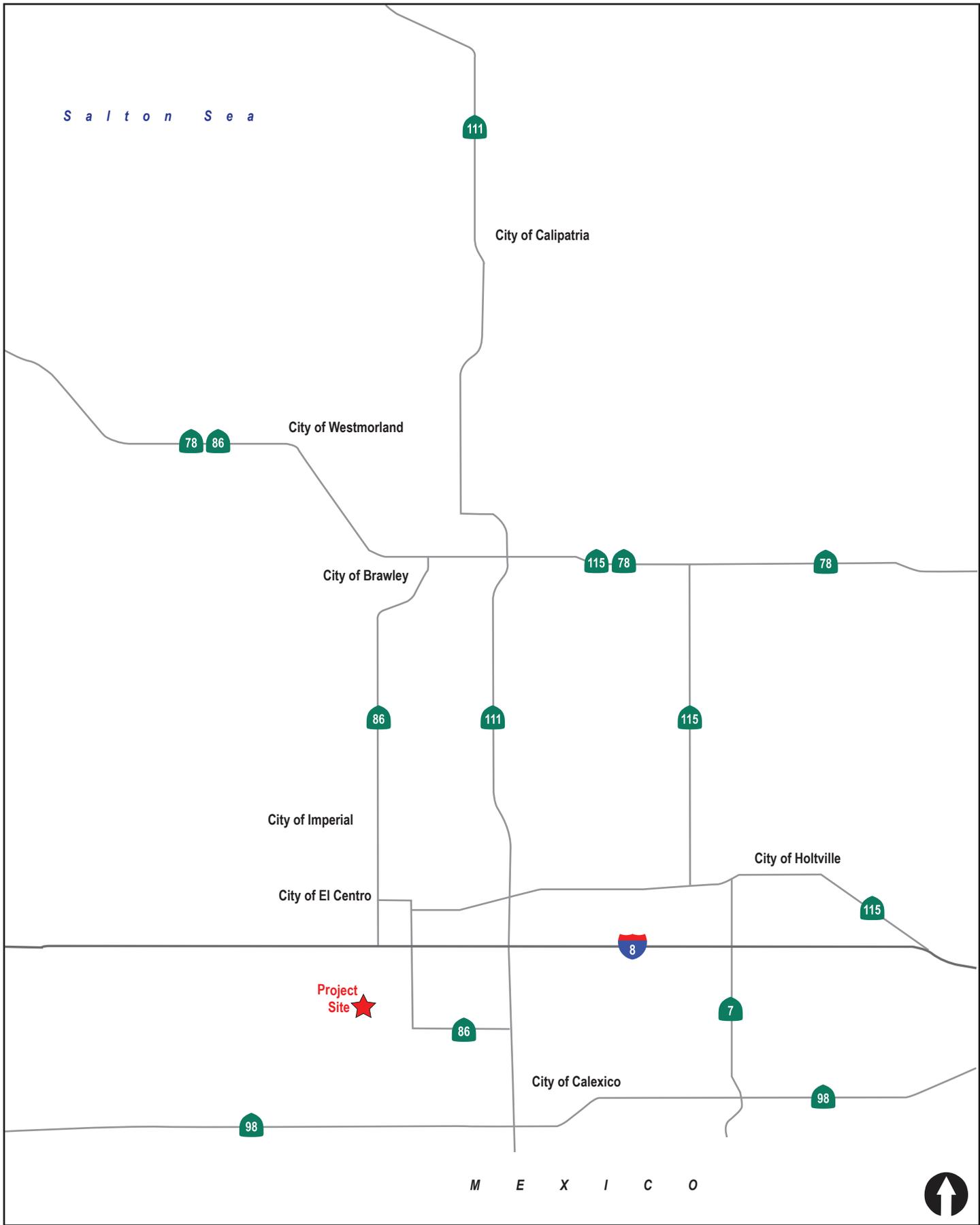


Figure 1-1

**Project Vicinity Map**

IMPERIAL COUNTY CENTER FOR EXCEPTIONAL CHILDREN

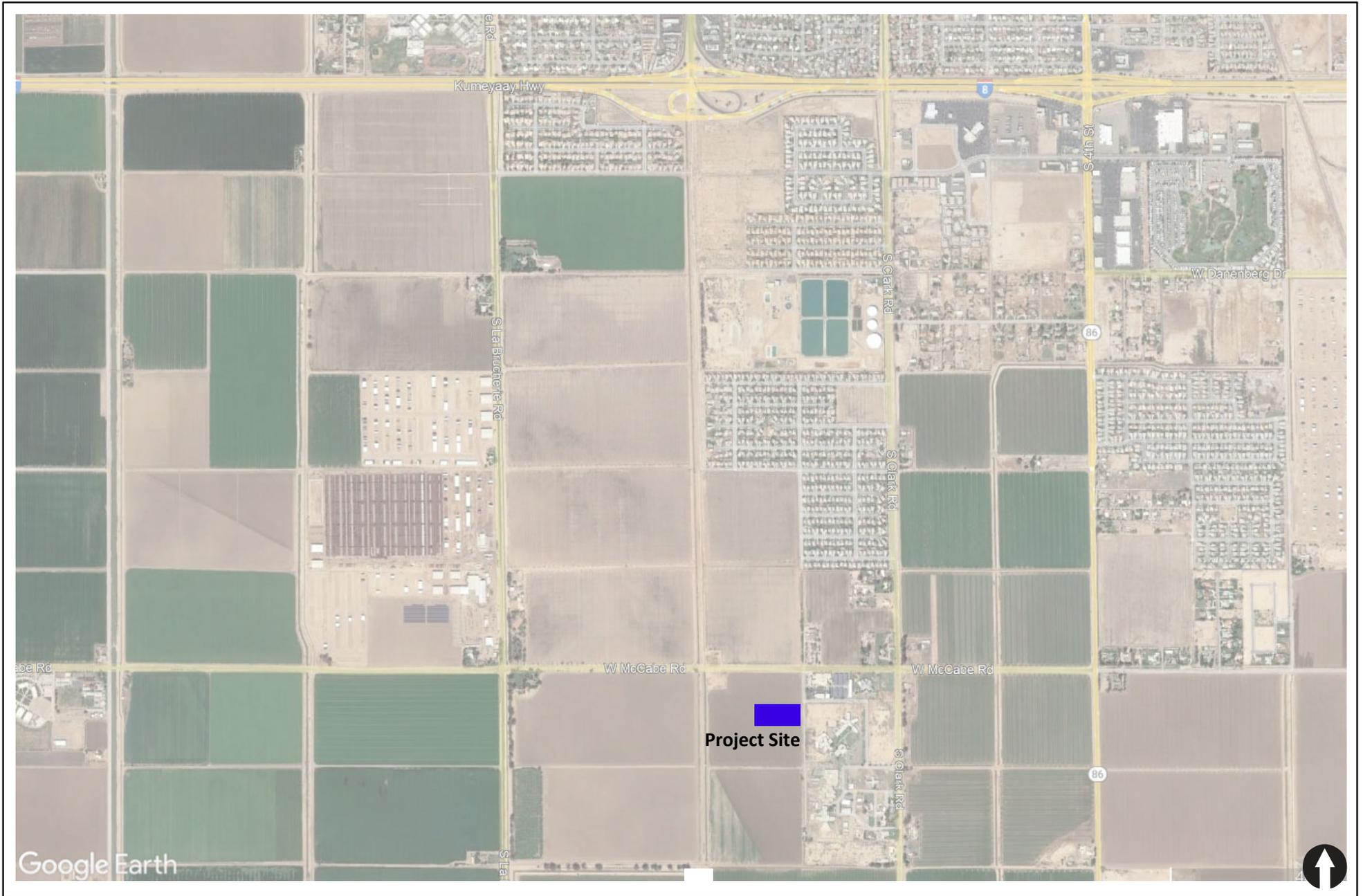


Figure 1-2  
**Project Area Map**

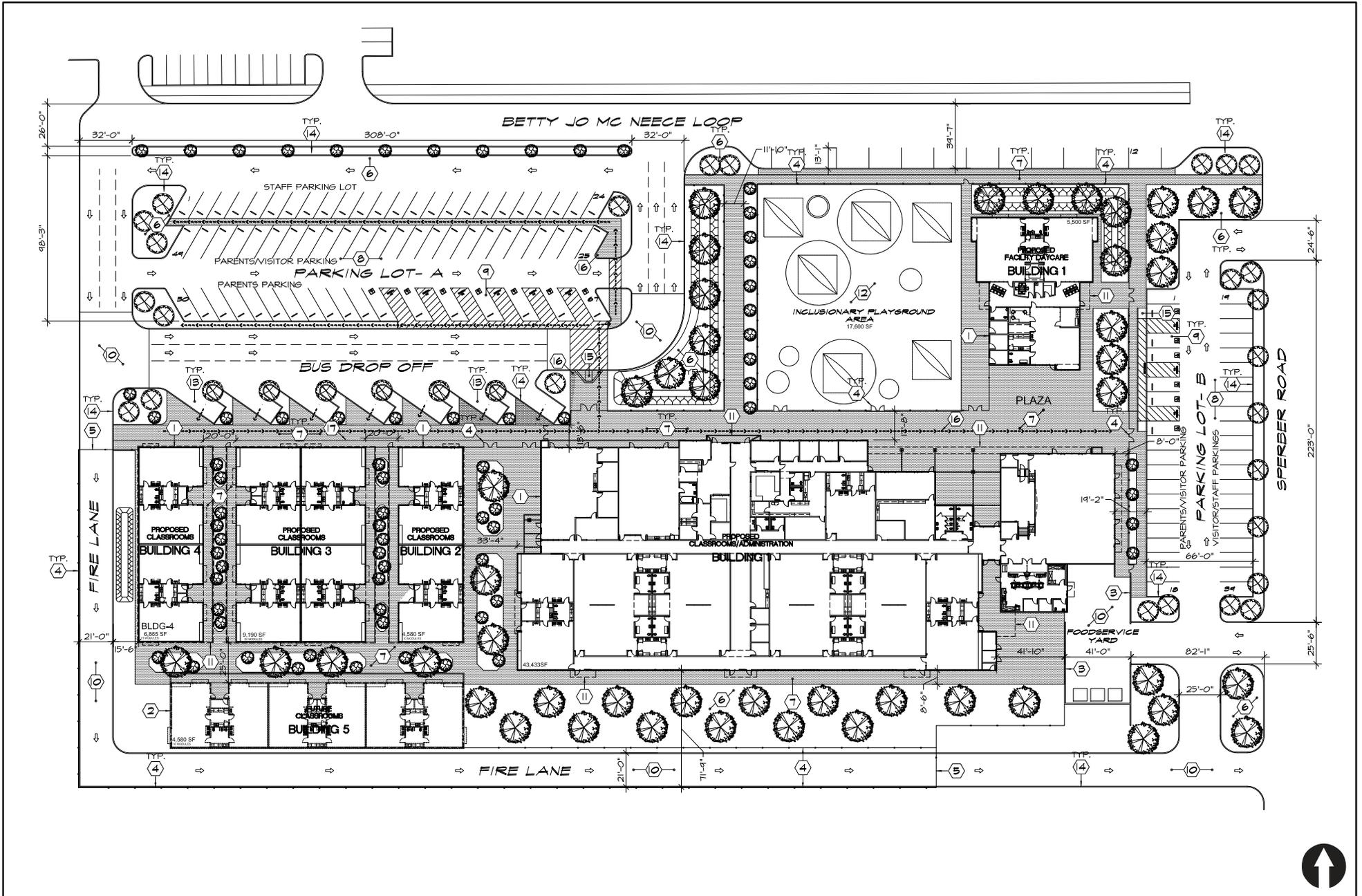


Figure 1-3  
**Site Plan**

## 2.0 METHODOLOGY AND THRESHOLDS

### 2.1 Study Area

The Project study area was determined based on the locations where the Project will add the greatest amount of traffic and includes the following intersections and segments:

#### INTERSECTIONS:

1. S. Clark Road and Wake Avenue
2. McCabe Road / La Brucherie Road
3. McCabe Road / Sperber Road
4. McCabe Road / S. Clark Road
5. McCabe Road / SR-86

#### SEGMENTS:

1. **La Brucherie Road:** Wake Avenue to McCabe Road
2. **McCabe Road:** La Brucherie Road to Sperber Road
3. **McCabe Road:** Sperber Road to S. Clark Road
4. **McCabe Road:** S. Clark Road to SR-86
5. **McCabe Road:** East of SR-86
6. **S. Clark Road:** Wake Avenue to McCabe Road
7. **S. Clark Road:** South of McCabe Road

### 2.2 Methodology

Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. Level of service provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. Level of service designation is reported differently for signalized intersections, unsignalized intersections and roadway segments.

In the Highway Capacity Manual (HCM) 6<sup>th</sup> Edition, LOS for signalized intersections is defined in terms of delay. The LOS analysis provides results in seconds of delay expressed in terms of letters A through F. Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. *Table 2-1* summarizes the signalized intersections levels of service descriptions.

#### 2.2.1 Signalized Intersections

*Table 2-2* depicts the criteria, which are based on the average control delay for any particular minor movement (unsignalized intersections) and overall intersection (signalized intersections).

For signalized intersections, LOS criteria are stated in terms of the average control delay per vehicle for a 15-minute analysis period. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay.

LOS A describes operations with very low delay, (i.e. less than 10.0 seconds per vehicle). This occurs when progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.

LOS B describes operations with delay in the range 10.1 seconds and 20.0 seconds per vehicle. This generally occurs with good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of Average delay.

LOS C describes operations with delay in the range 20.1 seconds and 35.0 seconds per vehicle. These higher delays may result from fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.

LOS D describes operations with delay in the range 35.1 seconds and 55.0 seconds per vehicle. At level D, the influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or higher v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are frequent.

LOS E describes operations with delay in the range of 55.1 seconds to 80.0 seconds per vehicle. This is considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences.

LOS F describes operations with delay in excess of over 80.0 seconds per vehicle. This is considered to be unacceptable to most drivers. This condition often occurs with over-saturation (i.e., when arrival flow rates exceed the capacity of the intersection). It may also occur at high v/c ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels.

**TABLE 2-1  
INTERSECTION LEVEL OF SERVICE DESCRIPTIONS**

LOS	Description
A	Occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
B	Generally, occurs with good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of average delay.
C	Generally, results when there is fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear in this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.
D	Generally, results in noticeable congestion. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume-to-capacity ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.
E	Considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high volume-to-capacity ratios. Individual cycle failures are frequent occurrences.
F	Considered to be unacceptable to most drivers. This condition often occurs with over saturation i.e. when arrival flow rates exceed the capacity of the intersection. It may also occur at high volume-to-capacity ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels

**TABLE 2-2  
INTERSECTION LEVEL OF SERVICE (LOS) & DELAY RANGES**

LOS	Delay (seconds/vehicle)	
	Signalized Intersections	Unsignalized Intersections
A	≤ 10.0	≤ 10.0
B	10.1 to 20.0	10.1 to 15.0
C	20.1 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	≥ 80.1	≥ 50.1

*Source:* Highway Capacity Manual 6.

## **2.2.2 Unsignalized Intersections**

For unsignalized intersections, LOS is determined by the computed or measured control delay and is defined for each minor movement. For All-Way-Stop-controlled (AWSC) intersections, the overall intersection delay is reported. For two-way-stop-controlled (TWSC) intersections, LOS is not defined for the intersection as a whole, but the worst-case movement (typically the minor street left-turn) delay and LOS are reported.

LOS F exists when there are insufficient gaps of suitable size to allow a side street demand to safely cross through a major street traffic stream. This LOS is generally evident from extremely long control delays experienced by side-street traffic and by queuing on the minor-street approaches. The method, however, is based on a constant critical gap size; that is, the critical gap remains constant no matter how long the side-street motorist waits.

LOS F may also appear in the form of side-street vehicles selecting smaller-than-usual gaps. In such cases, safety may be a problem, and some disruption to the major traffic stream may result. It is important to note that LOS F may not always result in long queues but may result in adjustments to normal gap acceptance behavior, which are more difficult to observe in the field than queuing.

## **2.2.3 Street Segments**

Street segment analysis is based upon the comparison of daily traffic volumes (ADTs) to the County of Imperial's Level of Threshold Volumes for Various Roadway Types (ADT) table (**Table 2-3**). This table provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.

## **2.3 Proposed Project Opening Year and Analysis Scenarios**

The following scenarios are analyzed in this study.

- Existing
- Existing + Project
- Existing + Project + Cumulative Projects

**TABLE 2-3  
LEVEL OF SERVICE THRESHOLD VOLUMES FOR VARIOUS ROADWAY TYPES (ADT)**

ROADWAY TYPE	Code	LOS A	LOS B	LOS C	LOS D	LOS E
10-Lane Freeway	10F	64,000	99,000	139,000	160,000	182,000
8-Lane Freeway	8F	51,000	79,000	112,000	136,000	146,000
6-Lane Freeway	6F	39,000	59,000	85,000	102,000	110,000
8-Lane Expressway	8E	35,000	54,000	75,000	90,000	98,000
6-Lane Expressway	6E	28,000	42,000	56,000	67,000	74,000
4-Lane Freeway	4F	26,000	40,000	57,000	69,000	74,000
8-Lane Divided Arterial (w/ left-turn lane)	9	40,000	47,000	54,000	61,000	68,000
6-Lane Divided Arterial (w/ left-turn lane)	7	32,000	38,000	43,000	49,000	54,000
4-Lane Expressway	4E	18,000	27,000	36,000	45,000	50,000
4-Lane Divided Arterial (w/ left-turn lane)	5	22,000	25,000	29,000	32,500	36,000
4-Lane Undivided Arterial (no left-turn lane)	4	16,000	19,000	22,000	24,000	27,000
2-Lane Rural Highway	2R	4,000	8,000	12,000	17,000	25,000
2-Lane Arterial (w/ left-turn lane)	3	11,000	12,500	14,500	16,000	18,000
2-Lane Collector	2	6,000	7,500	9,000	10,500	12,000
2-Lane Local	1	1,200	1,400	1,600	1,800	2,000
1-Lane Freeway Diamond Ramp	1D	11,000	12,800	14,700	16,500	18,300
2-Lane Freeway Diamond Ramp	2D	22,000	25,600	29,400	33,000	36,600
1-Lane Freeway Loop Ramp	1L	9,000	10,500	12,000	13,500	15,000
2-Lane Freeway Loop Ramp		16,000	18,700	21,300	24,000	26,700

Notes:

1. The above threshold volumes for preliminary planning purposes only. If available, the results of detailed level of service analyses will typically have priority over the levels of service derived from this table. In that case this table can be used by the analyst for providing additional considerations for recommending the appropriate general roadway type for the specific condition being analyzed.
2. All above facilities assume 60%/40% peak hour directional split. All above facilities assume peak hour representing approximately 10% of the Average Daily Traffic (ADT), except for mainline freeway facilities, which assume peak hour representing 9% of the Average Daily Traffic (ADT).
3. Based on *Highway Capacity Manual*, Transportation Research Board, 2000.
4. Freeway thresholds are consistent with conditions utilizing a .95 peak hour factor, with 2% trucks and slightly over a one-mile average interchange spacing.
5. Expressways are consistent with the average of a multi-lane highway (with no signals) and Class I Arterial (with an average spacing of 0.8 signals per mile and a .45 G/C ratio).
6. Arterial thresholds are consistent with the average Class 1 and Class 2 arterials with an assumed signal density of two signals per mile. This assumes a divided arterial with left-turn lanes. Thresholds for four-lane undivided arterials assume approximately two-thirds the capacity of a four-lane divided arterial due to the impedance in traffic flow resulting from left-turning vehicles waiting in the inside through lane, thus significantly reducing the capacity of the roadway.
7. Rural highways are generally consistent with the *2000 Highway Capacity Manual* rural highway, assuming 8% trucks, 4% RV's, 20% no-passing, and level terrain. The greatest difference is that it assumes a maximum capacity (upper end of LOS E) of 25,000 rather than 28,000 calculated using the new *Highway Capacity Manual*.
8. Two lane collectors assume approximately three-fourths of the capacity of a two-lane arterial with left-turn lanes. This is based on the assumption that left-turn channelization is not provided on a two-lane collector.
9. Local Street level of service thresholds are based upon "Neighborhood Traffic Related Quality-of-Life Considerations" which assumes a standard suburban neighborhood, 40-foot roadway width, a 25 mile per hour speed limit with normal speed violation rates.
10. Capacities for Diamond Ramps and Loop Ramps may be slightly higher or lower than the planning level capacities indicated above. The 2000 Highway Capacity Manual (2000 HCM) states that the capacity of a one-lane diamond to be 2,200 vehicles per hour (vph), and 1,800 vph for a small radius loop ramp. Two-lane freeway ramp capacities are estimated in the 2000 HCM to be 4,400 vph for a two-lane diamond and 3,200 vph for a two-lane small radius loop. Varying intermediate ramp capacities are provided for incremental conditions between these two extremes. Capacities given for each service level assume the same level of service for the adjoining merging roadway as well as level of service being determined by volume-to-capacity and not attainable speed. Level of service will be controlled by freeway level of service if worse than ramp. Mitigations of level of service deficiencies may include the addition of a lane on the freeway ramp, the addition of an auxiliary lane on the freeway mainline, the addition of approach lanes at the ramp junction with the local intersecting street, and/or geometric modifications to improve the efficiency of the ramp itself or its termini. The appropriate mitigation should be determined on a case-by-case basis, considering freeway main line volumes and weaving, the extent that the freeway ramp volume exceeds the above planning thresholds, and the levels of service of the ramp intersection with the local street.
11. All volumes are approximate and assume ideal roadway characteristics.

### 3.0 SUBSTANTIAL EFFECT CRITERIA

The County's General Plan states that the level of service (LOS) goal is for intersections and segments to operate at C or better.

If a location operates at LOS D or worse with and without project traffic, the project has a substantial effect if the project causes the intersection delta to increase by more than two (2) seconds, or the V/C ratio at a roadway segment to increase by more than 0.02.

## 4.0 EXISTING CONDITIONS

Effective evaluation of the traffic impacts associated with the proposed project requires an understanding of the existing transportation system within the project area. *Figure 4-1* shows an existing conditions diagram, including signalized/un-signalized intersections and lane configurations.

### 4.1 Existing Transportation Conditions

The facilities analyzed in this report fall under the jurisdiction of the City of El Centro and County of Imperial. The following is a brief description of the streets in the project area:

#### MCCABE ROAD

McCabe Road is classified as a Major Collector on the County of El Imperial Circulation Element. McCabe Road is currently constructed as an east-west two-lane undivided roadway providing one lane of travel per direction. No bike lanes or bus stops are provided, and parking is generally prohibited within the project area. The posted speed limit is 55 mph.

#### WAKE AVENUE

Wake Avenue is an east-west facility and is classified as a 2-Lane Collector between Austin Road and SR-86 and as a 4-Lane Collector between SR-86 and 2<sup>nd</sup> Street in the City of El Centro Circulation Element. It is currently constructed as a two-lane undivided roadway from Cypress Drive to 8<sup>th</sup> Street, as a four-lane divided roadway with a two-way left-turn lane, providing two travel lanes per direction, between 8<sup>th</sup> Street and SR-86. Sidewalks are provided on both sides of the roadway except for the portion between 6<sup>th</sup> Street and 4<sup>th</sup> Street, where no sidewalks are provided on the south curb. Curbside parking is not permitted. Bike lanes are not provided. The posted speed limit is 40 mph.

#### LA BRUCHERIE ROAD

La Brucherie Road is classified as a Minor Collector on the County of El Imperial Circulation Element. La Brucherie Road is currently constructed as a north-south two-lane undivided roadway providing one lane of travel per direction. No bike lanes or bus stops are provided, and parking is generally prohibited within the project area. The posted speed limit is 55 mph within City limits.

#### S. CLARK ROAD

S. Clark Road is classified as a Minor Arterial on the County of El Imperial Circulation Element. S. Clark Road is currently constructed as a four-lane undivided roadway between Wake Avenue and Palmview Avenue before narrowing to a two-lane undivided roadway between Palmview Avenue and McCabe Road. No bike lanes or bus stops are provided, and parking is generally prohibited within the project area. The posted speed limit is 50 mph.

## SPERBER ROAD

Sperber Road is an unclassified north-south two-lane undivided roadway within the study area. Sperber Road currently provides access to several County offices and departments. No bike lanes or bus stops are provided, and parking is generally prohibited within the project area. The speed limit is 25 mph. Access to the project site is proposed via Sperber Road.

## STATE ROUTE 86

SR-86 is classified as a State Highway/Expressway on the Imperial County General Plan Circulation Element. Within the study area, SR-86 is constructed as a three-lane divided roadway between Wake Avenue and Countryside Drive providing two lanes of travel in northbound direction and one lane in southbound direction. From Countryside Drive to McCabe Road, McCabe Road narrows to a 2-lane undivided roadway. The posted speed limit is generally 65 mph. Bike lanes are not provided, though the roadway is generally built with 8-foot shoulders. No bus stops are provided, and parking is not permitted along either side of the roadway.

### **4.2 Imperial Avenue Extension**

The extension of Imperial Avenue between I-8 and Dannenberg is currently under construction. The redesigned I-8 / Imperial Avenue diamond interchange has been completed and is open to traffic since December 2021. The extension of Imperial Avenue to Danenberg Drive is expected to be opened to traffic by fall 2023. Imperial Avenue will be extended further south to Valley View Avenue by 2024.

The extension of Imperial Avenue further south to connect to McCabe Road is not currently funded.

### **4.3 Existing Traffic Volumes – AM and PM Peak Hour and ADT**

Existing peak hour intersection turning movement volume counts and daily segment volume counts were conducted during the week of November 28<sup>th</sup>, 2022 at all study area intersections and roadway segments. *Table 4-1* summarizes the existing daily traffic volumes within the project area.

*Appendix A* contains the count sheets. The existing segment volumes are summarized in *Table 4-1*.

### **4.4 Existing Intersection Levels of Service**

*Table 4-2* summarizes the Existing intersections level of service. As seen in *Table 4-2*, all intersections are calculated to currently operate at LOS C or better during both the AM and PM peak hours.

*Appendix B* contains the Synchro Worksheets.

### **4.5 Existing Segment Levels of Service**

*Table 4-3* summarizes the Existing segment level of service. As seen in *Table 4-3*, all segments are calculated to operate at LOS A on a daily basis.

**TABLE 4-1  
EXISTING TRAFFIC VOLUMES**

<b>Segment</b>	<b>ADT</b>
<b>La Brucherie Road</b> Wake Avenue to McCabe Road	5,790
<b>McCabe Road</b> La Brucherie Road to Sperber Road	5,000
Sperber Road to S. Clark Road	5,050
S. Clark Road to SR-86	4,970
East of SR-86	5,000
<b>S. Clark Road</b> Wake Avenue to McCabe Road	4,440
South of McCabe Road	2,020

**TABLE 4-2  
EXISTING INTERSECTION OPERATIONS**

<b>Intersection</b>	<b>Control Type</b>	<b>Peak Hour</b>	<b>Delay <sup>a</sup></b>	<b>LOS <sup>b</sup></b>
1. Wake Ave / La Brucherie Road	Signal	AM	23.7	C
		PM	30.4	C
2. McCabe Road / La Brucherie Road	AWSC <sup>c</sup>	AM	22.8	C
		PM	10.0	A
3. McCabe Road / Sperber Road	TWSC <sup>d</sup>	AM	12.2	B
		PM	11.8	B
4. McCabe Road / S. Clark Road	AWSC	AM	15.5	C
		PM	10.4	B
5. McCabe Road / SR-86	Signal	AM	21.8	C
		PM	21.9	C

**Footnotes:**

- a. Average delay expressed in seconds per vehicle.
- b. Level of Service.
- c. AWSC – All-Way-Stop-Controlled intersection. Overall delay and LOS reported.
- d. TWSC – Two-Way Stop Controlled intersection. Minor street worst-case delay and LOS are reported.

**General Note:**

**Bold** indicates LOS E or worse operation.

<b>SIGNALIZED</b>		<b>UNSIGNALIZED</b>	
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

**TABLE 4-3  
EXISTING SEGMENT OPERATIONS**

<b>Intersection</b>	<b>LOS E Capacity<sup>b</sup></b>	<b>Volume</b>	<b>LOS<sup>c</sup></b>	<b>V/C<sup>d</sup></b>
<b>La Brucherie Road</b>				
Wake Avenue to McCabe Road	12,000	5,790	A	0.48
<b>McCabe Road</b>				
La Brucherie Road to Sperber Road	12,000	5,000	A	0.42
Sperber Road to S. Clark Road	12,000	5,050	A	0.42
S. Clark Road to SR-86	12,000	4,970	A	0.41
East of SR-86	12,000	5,000	A	0.42
<b>S. Clark Road</b>				
Wake Avenue to McCabe Road	12,000	4,440	A	0.37
South of McCabe Road	12,000	2,020	A	0.17

**Footnotes:**

- a. The roadway classification at which the road currently operates.
- b. The capacity of the roadway at LOS E. – Capacities are determined by the *City of El Centro General Plan* – Capacities are calculated if City of El Centro does not state LOS Thresholds and Capacities
- c. Level of Service.
- d. Volume/Capacity ratio.

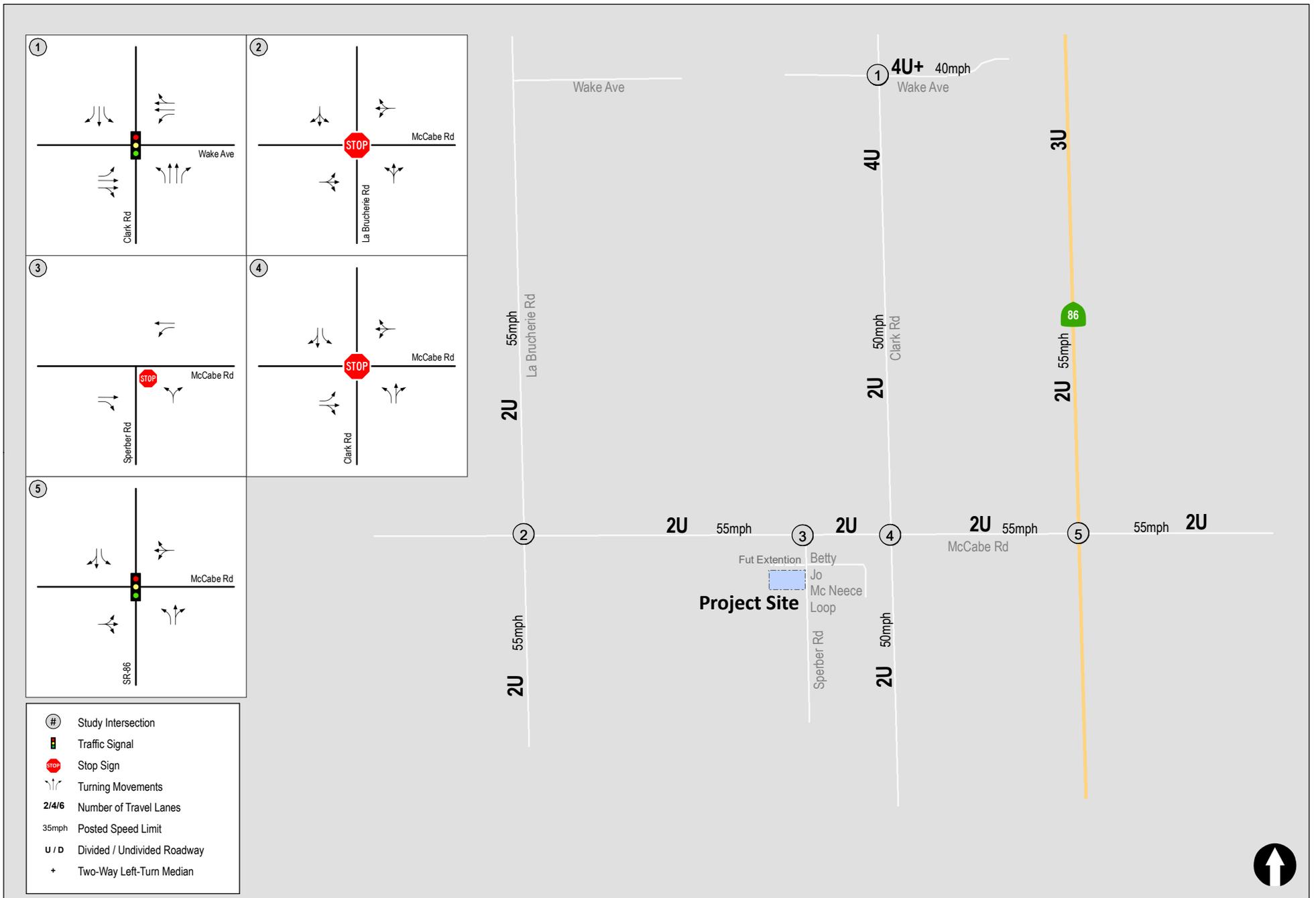


Figure 4-1  
**Existing Traffic Volumes**

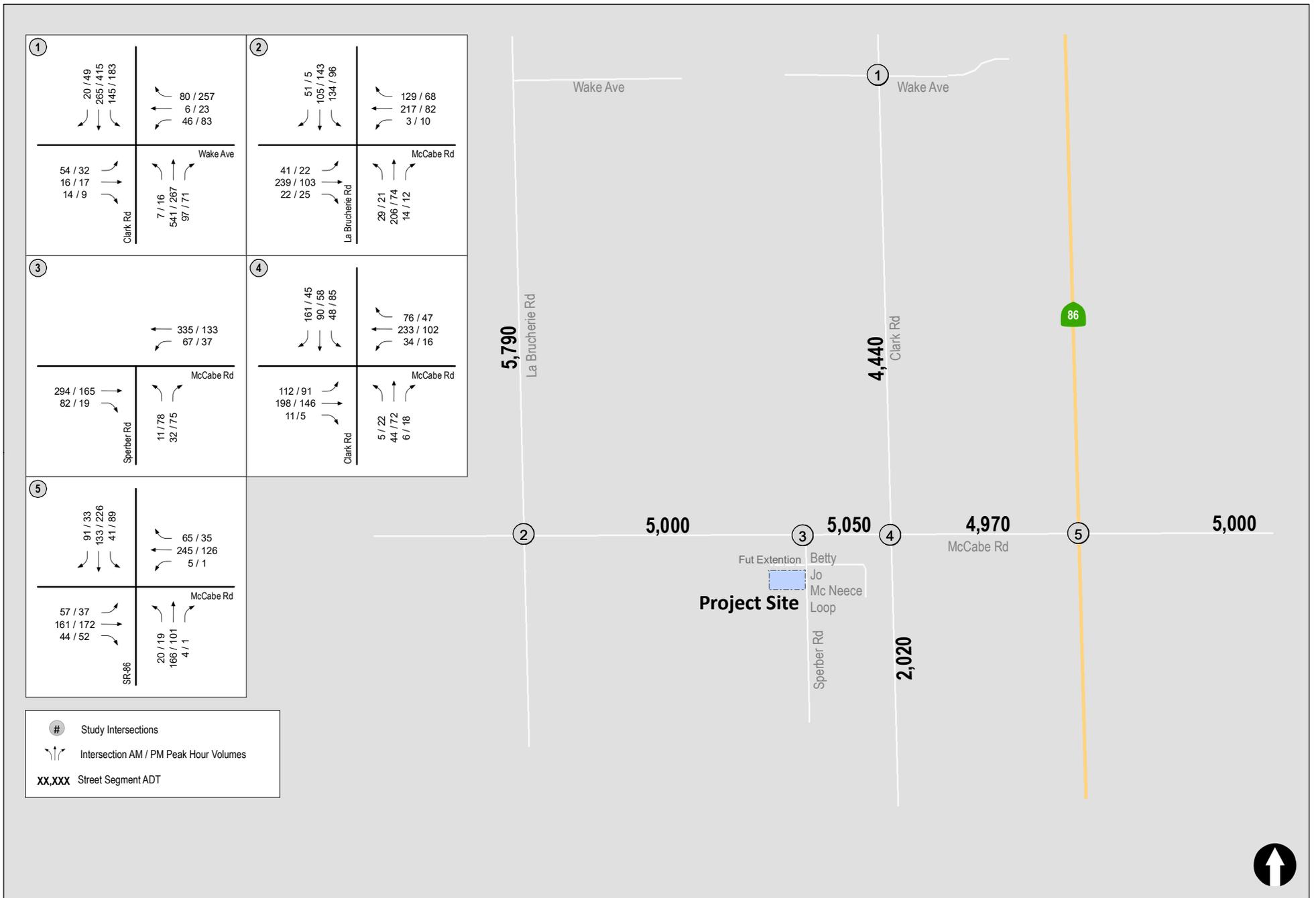


Figure 4-2  
**Existing Traffic Volumes**

## 5.0 PROJECT TRAFFIC

### 5.1 Trip Generation

Based on discussions with the client and project description, it was determined that trip rates for “Private School”, and “Pre-School” Land Uses (#532 and #565 respectively) would best fit the proposed project in terms of trip generation. Land use codes from the 11<sup>th</sup> Edition of the *Trip Generation* manual published by the Institute of Transportation Engineers (ITE) were used to estimate the trips generated by the proposed land uses.

The project proposes education assistance to severely handicapped children of all ages. Based on discussions with the client, of the 261 children, 189 children would be considered of pre-school age. The remaining 72 children would be in standard classrooms.

The ITE trip rates do not assume a bussing program exists. Based on the existing similar schools, approximately 70% of the kids will be bussed. To be conservative a trip reduction factor was applied.

*Table 5-1* summarizes the project trip generation. As seen in *Table 5-1*, the Project with the 30% reduction is calculated to generate a total of 666 daily trips with 145 AM peak hour trips (80 inbound and 64 outbound) and 134 PM peak hour trips (62 inbound 72 outbound).

### 5.2 Trip Distribution and Assignment

Project trip distribution was developed based on existing traffic patterns, and discussions with the client. and the regional roadway network.

*Figure 5-1* depicts the Project Trip Distribution. *Figure 5-2* depicts the Project Traffic Volumes and *Figure 5-3* depicts the Existing + Project traffic volumes.

**TABLE 5-1  
TRIP GENERATION SUMMARY**

Land Use	Size	Daily Trip Ends (ADT)		AM Peak Hour						PM Peak Hour					
				Rate	In:Out Split	Volume			Rate	In:Out Split	Volume				
		Rate <sup>a</sup>	Volume			In	Out	Total <sup>c</sup>			In	Out	Total <sup>d</sup>		
Private school	72 Students	2.48/student	<b>179</b>	0.80	63 : 37	36	22	<b>58</b>	0.53	42 : 58	16	22	<b>38</b>		
Pre School	189 Students	4.09/student	<b>773</b>	0.79	33 : 47	79	70	<b>149</b>	0.81	47 : 53	72	81	<b>153</b>		
Total trips (No bussing assumed)	261 Students	-	952	-	- : -	115	92	207	-	- : -	88	103	191		
<b>Total Project Trips (with bussing)<sup>b</sup></b>			<b>666</b>	-	- : -	<b>80</b>	<b>64</b>	<b>145</b>	-	- : -	<b>62</b>	<b>72</b>	<b>134</b>		

**Footnotes:**

- a. Rates are based on Institute of Transportation Engineers (ITE) *Trip Generation Manual 11<sup>th</sup> Edition* (Land Use 532 & 565).
- b. A 30% reduction in total project trips was applied based on the proposed 70% school bussing program.

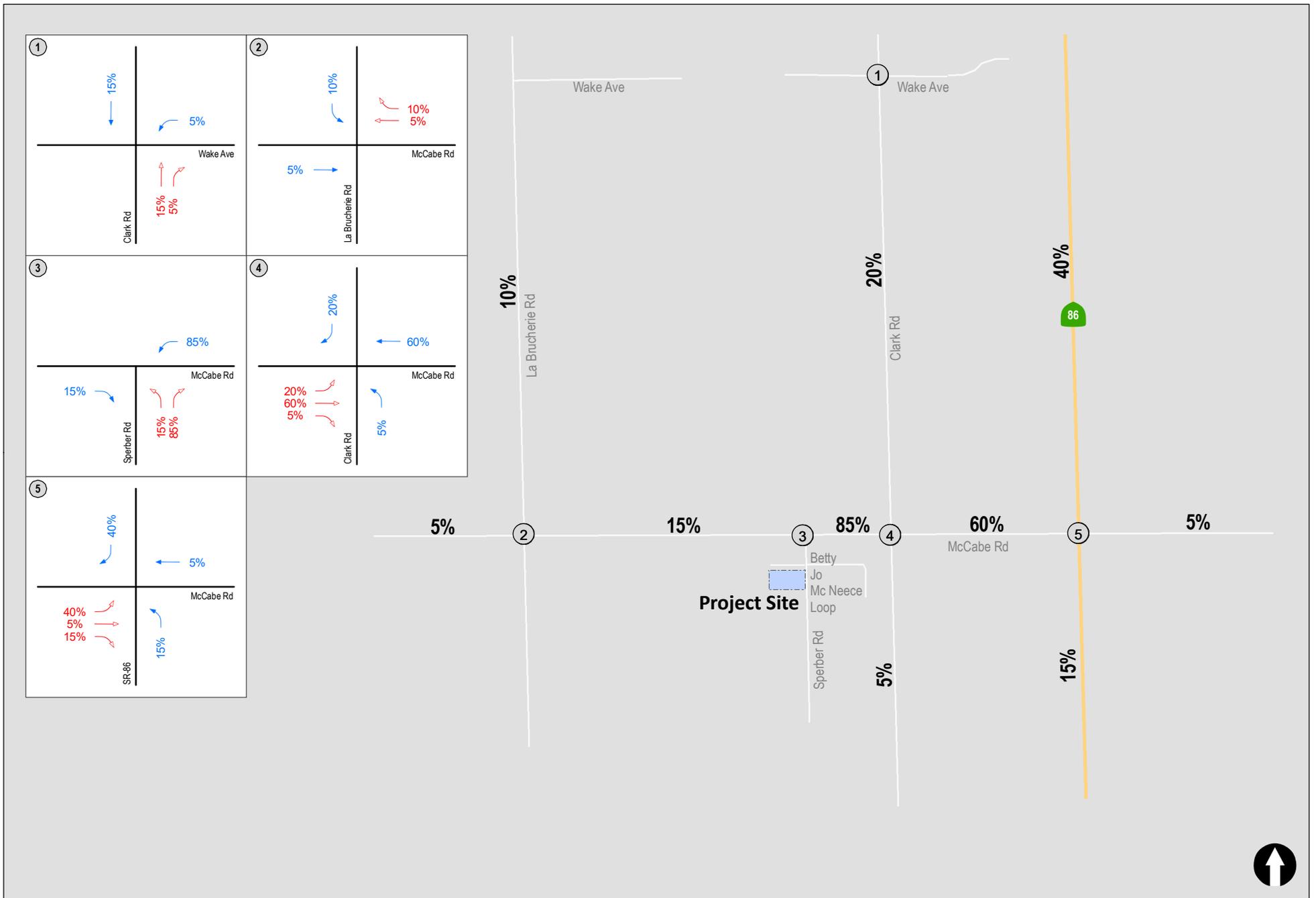


Figure 5-1

# Project Traffic Distribution



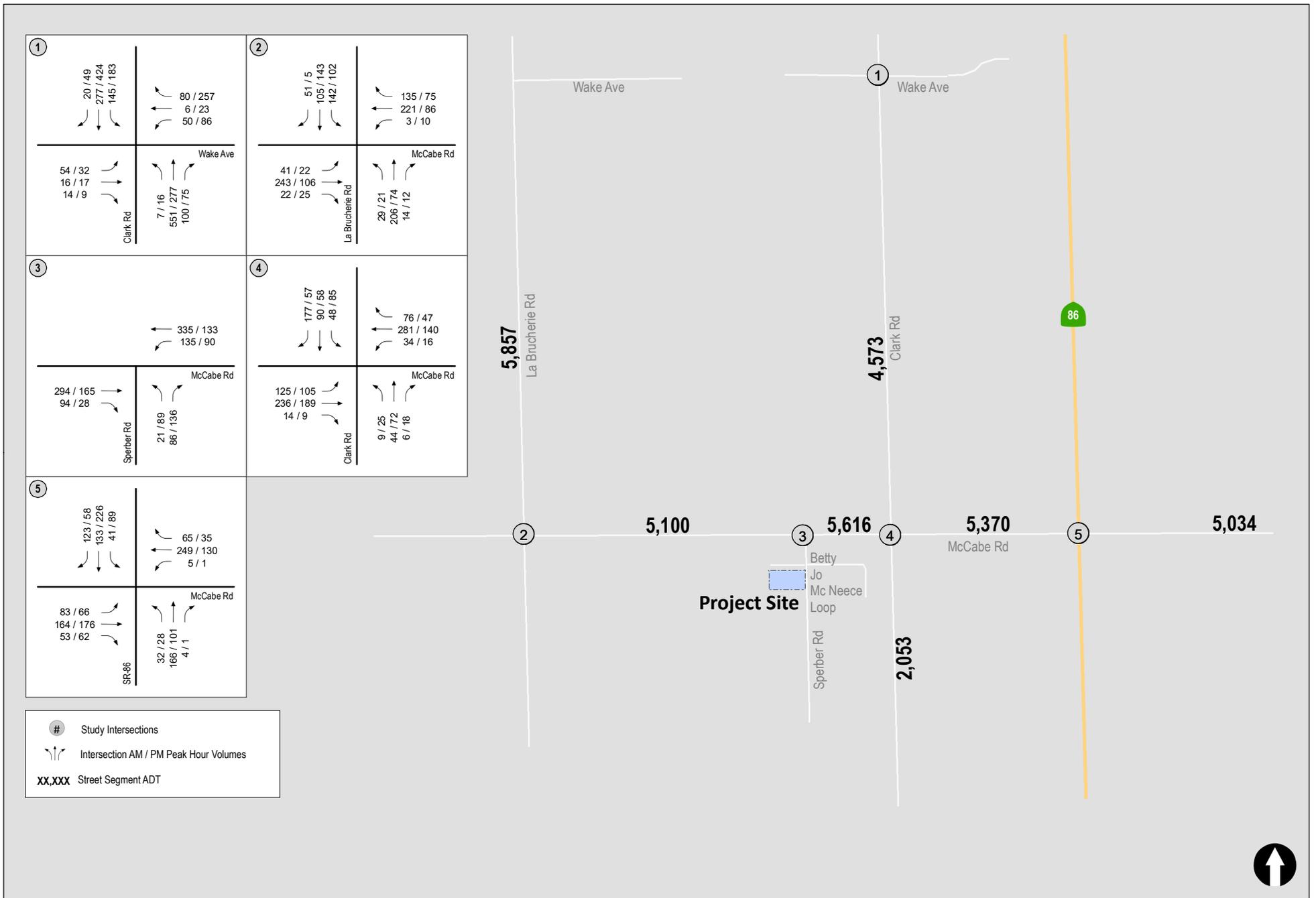


Figure 5-3  
**Existing + Project Traffic Volumes**

## 6.0 CUMULATIVE TRAFFIC VOLUMES

The following cumulative Projects were identified in the Project vicinity. Brief descriptions of each cumulative project are given below.

CHP Station: The proposed CHP Station will be located at the northwest corner of the SR 86 / Wake Avenue intersection. This project will have 33 employees and is estimated to generate a total of 357 daily trips with 36 AM peak hour trips (24 inbound and 12 outbound) and 24 PM peak hour trips (9 inbound and 15 outbound).

State Courthouse Office: The proposed State Courthouse Office will be located on the north side of Wake Street, between 8<sup>th</sup> Street and 4<sup>th</sup> Street. This project consists of 47,000 SF of office space and is estimated to generate a total of 1,057 daily trips with 157 AM peak hour trips (118 inbound and 39 outbound) and 78 PM peak hour trips (20 inbound and 58 outbound).

Wake Avenue Affordable Housing: The Project proposes a 288-unit Wake Avenue Affordable Housing Project located on the northeast corner of the 6<sup>th</sup> Street / Spears Avenue intersection in the City of El Centro. The project is estimated to generate a total of 1,214 daily trips with 80 AM peak hour trips (23 inbound and 57 outbound) and 110 PM peak hour trips (65 inbound and 45 outbound).

The traffic from these projects was assigned to the street system. **Figure 6-1** depicts the Cumulative Project traffic volumes and **Figure 6-2** depicts the Existing + Project + Cumulative Project traffic volumes. **Appendix C** contains the Cumulative Project data.



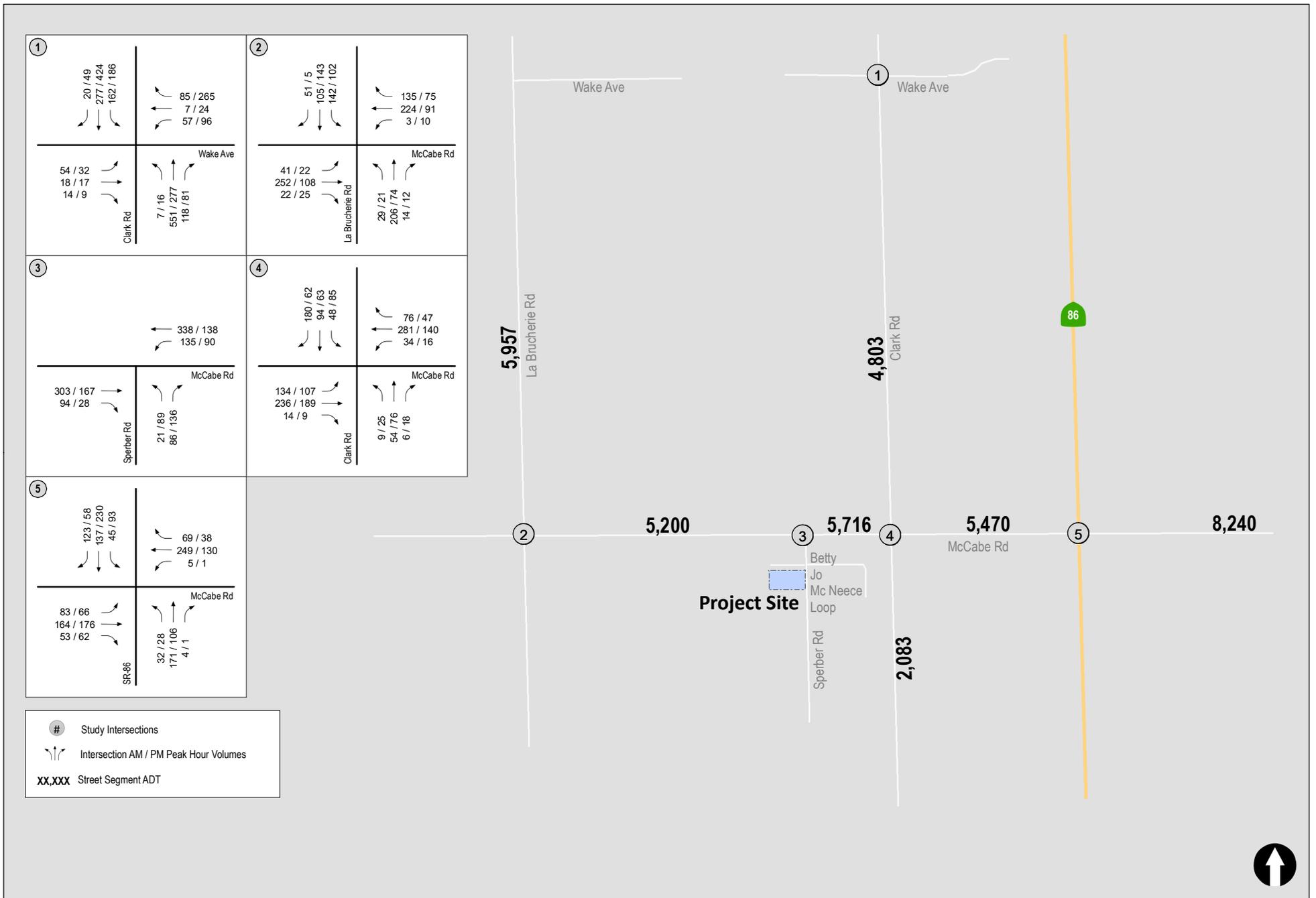


Figure 7-2  
**Existing + Project + Cumulative Projects Traffic Volumes**

## **7.0 NEAR-TERM ANALYSIS**

### **7.1 Existing + Project Analysis**

#### **7.2 Intersection Level of Service**

*Table 7-1* summarizes the Existing + Project intersections level of service. As seen in *Table 7-1*, with the addition of Project traffic, all intersections are calculated to operate at LOS C or better during both the AM and PM peak hours.

*Appendix B* contains the Synchro Worksheets.

#### **7.3 Segment Levels of Service**

*Table 7-2* summarizes the Existing + Project segment level of service. As seen in *Table 7-2*, with the addition of Project traffic, all segments are calculated to operate at LOS A on a daily basis.

#### **7.4 Identification of Intersection Deficiencies and Improvements.**

No intersection or segment substantial effects are identified and hence no improvements are required.

### **7.5 Existing + Project + Cumulative Projects Analysis**

#### **7.5.1 Intersection Level of Service**

*Table 7-1* summarizes the Existing + Project + Cumulative Projects intersection level of service. As seen in *Table 7-1*, with the addition of Cumulative Project traffic, the minor street worst case movements at all unsignalized intersections are calculated to operate at LOS D or better and all signalized intersections are calculated to operate at LOS D or better.

*Appendix B* contains the Synchro Worksheets.

#### **7.5.2 Segment Levels of Service**

*Table 7-2* summarizes the Existing + Project + Cumulative Projects segment level of service. As seen in *Table 7-2*, with the addition of Cumulative Project traffic, all segments are calculated to operate at LOS C or better on a daily basis.

#### **7.6 Identification of Intersection Deficiencies and Improvements.**

No intersection or segment deficiencies are identified and hence no improvements are required.

**TABLE 7-1  
NEAR-TERM INTERSECTION OPERATIONS**

Intersection	Control Type	Peak Hour	Existing		Existing + Project			Existing + Project + Cumulative Projects		Substantial Effect?
			Delay <sup>a</sup>	LOS <sup>b</sup>	Delay	LOS	Δ Delay <sup>c</sup>	Delay	LOS	
1. Wake Ave / La Brucherie Road	Signal	AM	23.7	C	23.8	C	0.1	24.6	C	No
		PM	30.4	C	30.9	C	0.5	31.9	C	No
2. McCabe Road / La Brucherie Road	AWSC <sup>d</sup>	AM	22.8	C	24.4	C	1.6	26.3	D	No
		PM	10.0	A	10.2	B	0.2	10.2	B	No
3. McCabe Road / Sperber Road	TWSC <sup>e</sup>	AM	12.2	B	13.9	B	1.7	14.1	B	No
		PM	11.8	B	13.7	B	1.9	13.8	B	No
4. McCabe Road / S. Clark Road	AWSC	AM	15.5	C	20.1	C	4.6	20.7	C	No
		PM	10.4	B	11.3	B	0.9	11.4	B	No
5. McCabe Road / SR-86	Signal	AM	21.8	C	22.4	C	0.6	22.6	C	No
		PM	21.9	C	22.8	C	0.9	22.9	C	No

**Footnotes:**

- a. Average delay expressed in seconds per vehicle.
- b. Level of Service.
- c. Increase in delay due to Project traffic.
- d. AWSC – All-Way-Stop-Controlled intersection. Overall delay and LOS reported.
- e. TWSC – Two-Way Stop Controlled intersection. Minor street worst-case delay and LOS are reported.

SIGNALIZED		UNSIGNALIZED	
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

**TABLE 7-2  
EXISTING + PROJECT + CUMULATIVE PROJECTS OPERATIONS**

Intersection	LOS E Capacity <sup>b</sup>	Existing + Project			Existing + Project + Cumulative Projects			Δ Delay <sup>e</sup>	Substantial Effect?
		Volume	LOS <sup>c</sup>	V/C <sup>d</sup>	Volume	LOS	V/C		
<b>La Brucherie Road</b>									
Wake Ave to McCabe Road	12,000	5,857	A	0.49	5,957	A	0.50	0.01	No
									No
<b>McCabe Road</b>									
La Brucherie Road to Sperber Road	12,000	5,100	A	0.43	5,200	A	0.43	0.00	
Sperber Road to S. Clark Road	12,000	5,616	A	0.47	5,716	A	0.48	0.01	No
S. Clark Road to SR-86	12,000	5,370	A	0.45	5,470	A	0.46	0.01	No
East of SR-86	12,000	5,034	A	0.42	8,240	C	0.69	0.27	No
									No
<b>S. Clark Road</b>									
Wake Ave to McCabe Road	12,000	4,573	A	0.38	4,803	A	0.40	0.02	No
South of McCabe Road	12,000	2,053	A	0.17	2,083	A	0.17	0.00	No

**Footnotes:**

- The roadway classification at which the road currently operates.
- The capacity of the roadway at LOS E. – Capacities are determined by the *City of El Centro General Plan* – Capacities are calculated if City of El Centro does not state LOS Thresholds and Capacities
- Level of Service.
- Volume/Capacity ratio.
- Increase in V/C ratio due to the Project.
- Capacity of a 4-Lane Collector is not given. Therefore, twice the capacity of a 2-Lane Collector is used.
- This segment has a raised median. The capacity of a 4-Lane Divided Arterial (w/ left-turn lane) is assumed.
- This segment has three lanes, one in the southbound direction and two lanes in the northbound direction and a raised median. 75% of a 4-Lane Divided Arterial (w/ left-turn lane) capacity is assumed.

## 8.0 SITE ACCESS ASSESSMENT

The main access to the site will be via the extension of Betty Jo Mc Neece Loop to Sperber Road. Two driveways will be provided along the future extension of Betty Jo Mc Neece Loop and the parking areas will serve staff and parent parking. It will also serve as the main parent drop off area and the bus drop off area. The west driveway will be one-way inbound and the east driveway will be one-way outbound. This one-way scheme will work well and limit conflicts with vehicles ingressing and egressing the site. A separate smaller parking area will be served via two driveways to Sperber Road.

The northern driveway on Sperber Road is proposed very close to Betty Jo Mc Neece Loop. It is recommended that this northern driveway be moved at a minimum of 100 feet from the intersection of Sperber Road and Betty Jo Mc Neece Loop, if possible.

## **9.0 ACTIVE TRANSPORTATION CONDITIONS**

### **9.1 Pedestrian Conditions**

Within the project vicinity, there are currently no sidewalks provided along any of the study roadways including La Brucherie Road, McCabe Road, S. Clark Road, and Sperber Road.

### **9.2 Bicycle Conditions**

Currently, there is a Class I Multi-Use Path and Class II bike lanes provided along La Brucherie Road. Class II Bike lanes are also provided along SR-86 and Wake Avenue within the project area. There are no other bicycle facilities provided along the remaining street segments within the study area.

### **9.3 Transit Conditions**

The Imperial Valley Transit (IVT) operates within the study area. A description of the transit services within the Project vicinity are as follows:

#### ***Blue Line – El Centro***

The Imperial Valley Transit (IVT) Blue line begins at State Street / 7<sup>th</sup> Street and ends at State Street / 7<sup>th</sup> Street. There are 17 stops along this route. It operates on the weekdays from approximately 6 AM to 6:30 PM. Services are at 140-minute frequency.

Stops at the above route are located along 4th Street (SR-86), Wake Avenue, and Danenberg Drive. The nearest bus stop at the project site is on S. Clark Road/South Loop Road, southeast of the project site.

***Appendix D*** contains the transit bus routes and schedules.

## 10.0 PROJECT VMT ANALYSIS

In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions. The VMT standard for evaluating transportation impacts under CEQA became mandatory statewide on July 1, 2020.

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

Imperial County has not yet formally developed guidelines or adopted significance criteria or technical methodologies for VMT analysis. Therefore, LLG utilized the Governor's Office of Planning and Research (OPR) guidelines from the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, to develop technical methodologies for this Project.

A VMT assessment was conducted for the project. Based on the project description, the majority of the new trips would be accounted for with bussing (70%). In addition, the trips that will go to/from the school are not new trips to the street system. This is because the children who will attend the new school are already at other schools. A List of these schools is detailed below.

- IVCEC (Existing Facility)
- Brawley Elementary
- Brawley Union High
- Heber Elementary
- El Centro, Elementary
- Seeley Union Elementary
- Holtville Unified
- Imperial Unified
- Central Union High
- Westmorland Union Elementary
- McCabe Union Elementary
- Calexico Unified

The project will consolidate the children at one location as opposed to numerous area schools. Therefore, the project would not have a significant VMT impact.

## 11.0 CONCLUSIONS

The intersection and segment analyses indicate that the increase in delay at intersections and the increase in v/c ratio at the segments do not exceed the County's allowable thresholds and therefore the Project is not required to implement any improvements.

It is recommended that the Project should provide the following:

1. Provide stop signs on Betty Jo Mc Neece Loop (both approaches) at the intersection with Sperber Road.
2. Relocate the northern driveway along Sperber Road to a minimum of 100 feet south of the intersection with Betty Jo Mc Neece Loop to avoid potential conflicts with the existing intersection of Sperber Road and Betty Jo Mc Neece Loop.

A VMT assessment was conducted for the project and based on the project description, the fact that the majority of the new trips would be accounted for with bussing (70%), and the fact that the trips going to/from the school are not new trips to the street system but rather trips that are otherwise going to other area schools, the project is screened out of requiring a formal VMT analysis.

*end of Report*