

MCCABE RANCH II TM 994

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT VOL. I

SCH NO. 2024050879

TR#00094

SPECIFIC PLAN AMENDMENT #24-0001

OCTOBER 2025

Prepared for:

County of Imperial, Planning & Development Services Dept.

Prepared by:

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DRAFT

SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

VOL. I

MCCABE RANCH II TM 994
AND
SPECIFIC PLAN AMENDMENT PROJECT

SCH No. 2024050879

TR#00094
SPECIFIC PLAN AMENDMENT #24-0001

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Prepared by Birdseye Planning Group, August 2025

Appendix C **Biological Resources Assessment Report**
Prepared by Barret's Biological Enterprises, April 2025

Appendix D **Energy Calculation Memorandum,**
Prepared by Birdseye Planning Group, February 2025

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Prepared by Birdseye Planning Group, August 2025

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Prepared by Dubose Design Group, May 2025

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Prepared by Linscott, Law & Greenspan, October 2025

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Appendix J **McCabe Ranch II TM 994**

ACRONYMS AND ABBREVIATIONS

A	
AB	Assembly Bill
ADT	Average Daily Trips
APCD	Air pollution control district
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQAP	Air Quality Attainment Plan
ATC	Authority to Construct
B	
BAU	Business as usual
BMP	Best Management Practice
B.P.	before present
C	
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEnergy	CalEnergy Operating Corporation
CalEPA	California Environmental Protection Agency
CALFIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal-IPC	California Invasive Plant Council
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Dept. of Transportation
CAPCOA	California Air Pollution Control Officer's Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations

ACRONYMS AND ABBREVIATIONS

CFS	cubic feet per second
CGS	California Geological Survey
CH4	Methane
CHP	California Highway Patrol
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CO2e	Carbon dioxide equivalent
COC	Contaminants of Concern
COSE	Conservation and Open Space Element
County	County of Imperial or Imperial County
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSHE	Circulation and Scenic Highways Element
CSSC	California Species of Special Concern
CWA	Clean Water Act
CY	Cubic yards
D	
dB	Decibels
DB	Designated Biologist
dBA	A-weighted sound pressure level
DDT	Dichlorodiphenyltrichloroethane
DEIR	Draft Environmental Impact Report
DPW	Department of Public Works
DTSC	Department of Toxic Substance Control
DWR	Department of Water Resources
E	
EIR	Environmental Impact Report
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESA	Environmental Site Assessment

ACRONYMS AND ABBREVIATIONS

F	
FAA	Federal Aviation Administration
FGC	Fish and Game Code
FMMP	Farmland Mapping & Monitoring Program
FTA	Federal Transit Administration
G	
GHG	Greenhouse gases
GPA	General Plan Amendment
GWP	Global warming potential
H	
HDPE	High-Density Polyethylene
HFCs	Hydrofluorocarbons
HPUD	Heber Public Utility District
HMBP	Hazardous Materials Business Plan
I	
ICAPCD	Imperial County Air Pollution Control District
ICFD	Imperial County Fire Department
ICPDSD	Imperial County Planning & Development Services Department
IID	Imperial Irrigation District
IOD	Irrevocable Offer of Dedication
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
L	
LAFCO	Local Agency Formation Commission
Ldn	Day-Night Average Level
LEA	Local Enforcement Agency
Leq	Equivalent continuous sound level
LOS	Level of Service
LUE	Land Use Element
M	
MBTA	Migratory Bird Treaty Act
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million metric tons
mph	miles per hour

ACRONYMS AND ABBREVIATIONS

MPO	Metropolitan Planning Organizations
MT	Metric tons
N	
N_2O	Nitrous oxides
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NE	Noise Element
NO_2	Nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
NORM	Naturally Occurring Radioactive Materials
NOx	Oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRHP	National Register of Historic Place
O	
O_3	Ozone
OCP	Organochlorine Pesticides
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSHA	United States Occupational Safety and Health Administration
P	
PAHs	Polycyclic Aromatic Hydrocarbons
APL	project action levels
Pb	Lead
PCE	passenger car equivalent
PFCs	perfluorocarbons
PGA	peak ground acceleration
PM	Particulate matter
$PM_{2.5}$	particulates less than 2.5 microns in diameter
PM_{10}	Particulate matter 10 micrometers or less in diameter
PMP	probable maximum precipitation
ppm	Parts per million
PRC	Public Resource Code

ACRONYMS AND ABBREVIATIONS

PRMMP	Paleontological Resource Mitigation and Monitoring Plan
Project	Proposed project
PTC	Permit to Construct
R	
RAO	remedial action objective
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Concern
REI	re-entry interval
ROG	reactive organic gas
ROW or R/W	Right-of-way
RPS	Renewables Portfolio Standard
RSL	USEPA Region 9 Regional Screening Goals
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	
SRP	soil remediation plan
SB	Senate Bill
SCH	State Clearinghouse Number
SCS	Sustainable Communities Strategy
SEIR	Supplemental EIR
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLCP	short-lived climate pollutants
SO_2	Sulfur dioxide
SOx	Oxides of sulfur
SOI	Sphere of Influence
SP	Specific Plan
SPA	Specific Plan Area
SPSE	Seismic and Public Safety Element, County of Imperial
SSC	Species of Special Concern
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	California State Water Resources Control Board
SWRCB	State Water Resources Control Board

ACRONYMS AND ABBREVIATIONS

T	
TAC	Toxic air contaminant
TDS	Total Dissolved Solids
TM 994	Subdivision Tract Map 994
TPHs	Total Petroleum Hydrocarbons
TNW	Traditional Navigable Water
U	
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
UV	ultraviolet
V	
VdB	vibration decibels
VMT	Vehicle miles traveled
WDR	Waste Discharge Requirement
W	
WEAP	Worker Environmental Awareness Program
WUS	Waters of the U.S.

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1.0 EXECUTIVE SUMMARY

1.1. Purpose and Scope of the Supplemental Environmental Impact Report

The purpose of a Supplemental Environmental Impact Report (SEIR) is to assess the change in the environmental significance conclusions and/or mitigation measures originally identified in the previously certified Environmental Impact Report for the McCabe Ranch II Specific Plan (Certified EIR), State Clearinghouse No. 2008111037, attributable to either: 1) changes in the project; 2) changes in the circumstance under which the project is undertaken; or 3) the introduction of new information of substantial importance that was not known at the time the previous EIR was certified.

The reason for preparation of this SEIR primarily relates to the first two conditions (i.e., changes in a project and changes in circumstances under which the project is taken), because the current proposals differs from the project that was approved as part of the *McCabe Ranch II Specific Plan Final Environmental Impact Report, State Clearinghouse No. 2008111037* (Certified EIR). Additionally, since the Imperial County Board of SupervisorsCertified EIR in December 2010, numerous laws, ordinances, regulations, standards, plans and policies applicable to the project have been introduced, updated and/or revised. These regulatory changes represent a change in circumstances under which the project would be taken. The scope of this SEIR focuses on a comparison between the physical environmental effects described and evaluated in the Certified EIR for the McCabe Ranch II Specific Plan and those that would result from the proposed McCabe Ranch II Subdivision Tract Map 994 and Specific Plan Amendment (Project or proposed Project).

The McCabe Ranch II Specific Plan Final EIR was certified by the County of Imperial as the Lead Agency under the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines (Sections 15162 and 15163), this Supplement to the Certified EIR has been prepared in order to address the potential environmental impacts of the proposed changes in the Project. To determine whether the proposed Project is eligible for the preparation of an SEIR, the criteria in Section 15162 governing preparation of Subsequent Documents and the additional criteria in Section 15163 governing preparation of Supplemental Documents must be met, as follows:

1. There are no substantial changes in the project which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects (Section 15162).

2. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects (Section 15162).

3. There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR

was certified that shows any of the following (Section 15162):

(a) The project will have one or more significant effects not discussed in the previous EIR.

(b) Significant effects previously examined will be substantially more severe than shown in the previous EIR.

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

4. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation (Section 15163).

As stated in Section 15163 of the CEQA Guidelines, the Lead Agency may choose to prepare a Supplemental EIR rather than a Subsequent EIR if:

1. Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

The County has determined that CEQA requires preparation of a Supplemental EIR, rather than a Subsequent EIR, because all of the conditions in Section 15163 regarding preparation of a Supplemental EIR can be met, including minor changes to the Certified EIR necessary to make it adequately apply to the proposed Project. An SEIR need only contain the information necessary to make the previous EIR adequate for the project as revised (Section 15163).

Additionally, an SEIR may be circulated in accordance with CEQA Section 15087 by itself without recirculating the previous Draft or FEIR. When the Lead Agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the SEIR. A finding under Section 15091 must be made for each significant effect shown in the previous EIR as revised in the SEIR.

In accordance with Section 15082 of the CEQA Guidelines, the ICPDSD issued a Notice of Preparation (NOP) of a Supplemental EIR for the Project and an accompanying Initial Study (SCH No. 2024050879), which are included in Appendix A-1 within Volume II (Technical Appendices) of this SEIR. The NOP was published in the Imperial Valley Press newspaper and was submitted to federal, state, and local agencies, special districts, California Native American Tribes and other interested parties for a 35-day public review period. The public review period for the NOP began on May 20, 2024, and ended on June 24, 2024.

The County will consider the information in the SEIR, public and agency comments on the EIR, and testimony at public hearings in their decision-making process. As a legislative action, the final decision to approve, conditionally approve, or deny the proposed project is made by the Board of Supervisors. Other discretionary actions, approvals and permits are described in Chapter 3.0, Project Description.

1.2. Project Location and Setting

McCabe Ranch II Tract Map 994 Project site is an approximately 351.2-acre portion of the 468-acre McCabe Ranch II Specific Plan Area generally located north of the Community of Heber and south of the City of El Centro, in the County of Imperial, California. The McCabe Ranch II Tract Map 994 Project site is bounded by McCabe Road on the north, Dogwood Road on the east, State Route 86 (SR-86) on the west, and the western extension of Correll Road on the south. The McCabe Ranch II Tract Map 994 Project site is located in Section 20, Range 14 East, Township 16 South within the U.S. Geological Survey (USGS) Heber, California 7.5-minute topographic.

1.3. Project Synopsis

McCabe Ranch Realty, LLC (Applicant) is seeking to process a Subdivision Tentative Map, referred to as the McCabe Ranch II Tract Map 994, for an approximately 351.2-acre portion of the McCabe Ranch II Specific Plan Area to accommodate the phased development of 1,610 residential units (single- and multiple-family units), a 13-acre elementary school site for the McCabe Union School District, parks, roadways, associated utilities, drainage and storm water treatment improvements. The McCabe Ranch II Tract Map 994 (Project or proposed Project) is comprised of four (4) parcels; County of Imperial Assessor Parcel Numbers (APNs) 054-130-072, 054-130-076, 054-130-077, and 054-130-078. The Imperial Irrigation District's Date Drain No. 3 and Dogwood Canal both traverse the Project area in a north-south direction.

1.4. Project Objectives

The McCabe Ranch II Specific Plan is designed to be a well-rounded community, providing a variety of housing types, schools, community facilities, and parks, along with both "village" commercial and medium commercial areas. The residential component would be broken into two segments: a

gated community along the northern portion and an open community in the southern portion. A major goal of the project is to provide housing opportunities for varying incomes and stages of life.

The following objectives were identified in the Certified EIR for the McCabe Ranch II Specific Plan:

Objective 1: Develop a highly walkable community plan that integrates a variety of residential uses, including conventional and gated communities, commercial areas, parks, schools, and other facilities essential to the daily lives of the residents.

Objective 2: Provide a variety of housing opportunities, ranging in size and affordability, to meet the housing needs of the region.

Objective 3: Incorporate the village commercial area to provide adequate service and shopping opportunities for both local residents and visitors.

Objective 4: Provide the business/office area to support job creation within the Plan.

Objective 5: Incorporate design features that support a unique living environment with a strong sense of community and social interaction.

Objective 6: Use a series of parkland areas connected by a trails system to link compatible land uses that are within easy walking distance of each other.

Objective 7: Promote an active lifestyle by providing a variety of recreation amenities such as recreational sports facilities, passive parks, walking trails, bike routes, parks, and open spaces.

Objective 8: Provide a park or open space within a five-minute walking distance of most residences in the Plan area.

Objective 9: Enhance the community's well-used sports facilities and reputation as a youth sports community by incorporating a variety of sports fields within many of the Plan's park areas.

Objective 10: Design a safe and efficient circulation system that adequately supports the anticipated level of traffic in and around the Plan area.

Objective 11: Provide public services that meet the needs of development in the Plan area, including a potential sheriff storefront in the village.

Objective 12: Develop a financing and phasing plan that provides for the efficient and timely provision of infrastructure and public services as development occurs.

Objective 13: Assist in the planning, design, construction and financing of school facilities to serve the specific plan area concurrent with the phasing of development of the residential uses.

The following project objectives specific to this proposed McCabe Ranch II TM 994 and Specific Plan Amendment (Project) include:

Objective 14: Develop within an urban land use designation that does not require an Amendment to the General Plan Land Use Element to avoid further reduction of agriculturally zoned lands.

Objective 15: Maximize the number of residential units to be developed within each of the designated residential parcels to assist the County and state in addressing the housing crisis in California, while maintaining the overall residential cap of 2,300 DUs identified in the adopted McCabe Ranch II Specific Plan.

Objective 16: Minimize the number of mini-estate and-estate lots (10,000 SF and larger) while maximizing the number of flex and small lots to provide more attainable housing opportunities.

Objective 17: Increase the maximum allowed number of multi-family units from that provided in the adopted McCabe Ranch II Specific Plan to further provide more attainable housing opportunities.

Objective 18: Maintain the allowable densities and intensities of development identified in the adopted McCabe Ranch II Specific Plan as allocated to those parcels under separate ownerships from the applicant's parcels.

Objective 19: Obtain public services from a willing public entity whose sphere of influence currently includes the subject development for efficiency.

Objective 20: To the extent feasible, cooperate with the separate ownerships within the McCabe Ranch II Specific Plan Area in the phasing and cost sharing of the necessary public infrastructure.

1.5. Summary of Significant Impacts and Mitigation Measures

Based on the analysis contained in Chapter 4 of this SEIR, the proposed McCabe Ranch II TM 994 and Specific Plan Amendment Project would result in the potential for significant impacts to air quality and greenhouse gases, biological resources, cultural and paleontological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation/traffic and tribal cultural resources. Mitigation measures have been identified which would reduce impacts to all resources to below a level of significance.

Table 1-1 summarizes the potential environmental impacts of the McCabe Ranch II TM 994 and Specific Plan Amendment by impact area. It also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts and the level of significance after mitigation.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.2 Air Quality			
Impact 4.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant.	None	Less than Significant.
Impact 4.2-2: Cumulatively considerable net increase of 1 any criteria pollutant.	Potentially Significant.	**MM 4.3.1 Implement ICAPCD Regulation VIII** Future developers shall implement applicable requirements under ICAPCD Regulation VIII. According to the ICAPCD CEQA Handbook, the standard mitigation measures for fugitive PM10 control and for construction equipment shall be implemented at all construction sites, regardless of the size. Project developers shall abide by standard and discretionary mitigation measures listed in Section 7.1 of the Imperial County 2017 CEQA Air Quality Handbook. ~~The measures will be reviewed on a project-by-project basis to determine the applicable mitigation measures for subsequent environmental documents.~~ The following are the standard mitigation measures identified in the ICAPCD CEQA Handbook. **Standard Mitigation Measures for Fugitive PM10 Control** a. All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover. b. All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20%	Less than Significant

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. c. All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. d. The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material. e. All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area. f. Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. g. The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a “Temporary Unpaved Road”. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		In order to provide a greater degree of PM10 reductions, above that required by Regulation VIII, the following *Discretionary Mitigation Measures for Fugitive PM10 Control* shall be required as recommended by ICAPCD: **Discretionary Mitigation Measures for Fugitive PM10 Control** a. Water exposed soil with adequate frequency for continued moist soil. b. Replace ground cover in disturbed areas as quickly as possible c. Automatic sprinkler system installed on all soil piles d. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site. e. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees f. Implement a shuttle service to and from retail services and food establishments during lunch hours **Standard Mitigation Measures for Construction Equipment** a. Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment. b. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. c. Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		d. Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). **Enhanced Mitigation Measures for Construction Equipment** a. Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways. b. Implement activity management (e.g., rescheduling activities to reduce short-term impacts). **Mitigation Measures for ROG Control** a. Whenever technologically feasible, architectural coating for interiors and exteriors in both residential and non- residential applications shall use low-ROG coatings that, on a weighted average, are 100 grams per liter of ROGs or less. b. The project sponsor shall apply for Emissions Reduction Credits (ERC) certificate from the ICAPCD. **MM 4.3.2a Reduce Operational Impacts** To reduce operational impacts, the following mitigation measures shall be implemented by developers for subsequent projects within the McCabe Ranch II Specific Plan area. a. Applicants shall be required to comply with the applicable mitigation measures in the Air Quality Attainment Plan, District Rules, Traffic Control Measures, and Regulation VIII for the ICAPCD. b. Applicants shall provide bicycle parking.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		c. Applicants shall provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles. d. Applicants shall use low-energy parking lot and streetlights (i.e., sodium). e. Applicants shall use double-paned windows. f. Applicants shall install door sweeps and weatherstripping if more efficient doors and windows are not available. g. Project developers of commercial/business park uses shall implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment. **MM 4.3.2b ICAPCD Rule 310 Compliance** Future developers shall comply with ICAPCD Rule 310. **MM 4.3.2c ICAPCD Standard and Discretionary Mitigation Measures** Project developers shall abide by standard and discretionary mitigation measures listed in Section 7.2 of the Imperial County 2017 CEQA Air Quality Handbook including: **RESIDENTIAL PROJECTS** Standard mitigation measures for residential projects include the following site design and energy efficiency standards: **Standard Site Design Measures** a. Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel;	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		b. Allocate easements or land dedications for bikeways and pedestrian walkways; c. Provide continuous sidewalks separated from the roadway by landscaping and on-street parking. Adequate lighting for sidewalks must be provided, along with crosswalks at intersections; and d. Bicycle storage at apartment complexes or condos without garages. **Standard Residential Energy Efficiency Measures** a. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24. **COMMERCIAL PROJECTS** Standard mitigation measures for commercial projects include the following site design and energy efficiency standards: **Standard Site Design Measures** a. Provide on-site bicycle lockers and/or racks; b. Provide on-site eating, refrigeration and food vending facilities to reduce lunchtime trips; c. Provide shower and locker facilities to encourage employees to bike and/or walk to work; d. Provide for paving a minimum of 100 feet from the property line for commercial driveways that access County paved roads as per County Standard Commercial Driveway Detail 410B (formerly SW-131A).	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Standard Energy Efficiency Measures a. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24. Additionally, project developers shall incorporate the following Discretionary Site Design Mitigation measures listed in Section 7.3 of the Imperial County 2017 CEQA Air Quality Handbook including: **RESIDENTIAL PROJECTS** **Discretionary Site Design Measures** a. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to project. b. For bus service within a ¼ mile of the Project provide bus stop improvements such as shelters, route information, benches and lighting. c. Increase street tree planting. d. Outdoor electrical outlets to encourage the use of electric appliances and tools. e. Provide bikeway lanes and/or link new comparable bikeway lanes to already existing lanes. f. Increase the number of bicycle routes/lanes. g. Provide pedestrian signalization and signage to improve pedestrian safety. h. Synchronize traffic lights on streets impacted by development	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		COMMERCIAL PROJECTS **Discretionary Site Design Measures** a. Increase street tree planting b. Shade tree planting in parking lots to reduce evaporative emissions from parked vehicles. c. Increase number of bicycle routes/lanes. d. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to protect or improve transit stop amenities. e. For bus service within a ¼ mile of the project provide bus stop improvements such as shelters, route information, benches and lighting f. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment. g. Provide pedestrian signalization and signage to improve pedestrian safety. h. Synchronize traffic lights on streets impacted by development. **Discretionary Residential Energy Efficiency Measures** a. Use roof material with a solar reflectance value meeting the EPA/DEO Energy Star® rating to reduce summer cooling needs. b. Use built-in energy efficient appliances. c. Use double-paned windows. d. Use low energy street lighting (i.e., sodium). e. Use energy efficient interior lighting.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		f. Use low energy traffic signals (i.e., light emitting diode or LED). g. Install door sweeps and weather stripping if more efficient doors and windows are not available. h. Install high efficiency gas/electric space heating. **INDUSTRIAL PROJECTS** a. Implement carpool/vanpool programs and incentives (i.e., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.) b. Provide for shuttle/mini bus service such as to establish a shuttle service from residential care areas to worksite. c. Provide preferential carpool and vanpool parking. d. Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc. if the project is located on an established transit route. e. Design and locate buildings to facilitate transit access (i.e., locate building entrances near transit stops, eliminate building setbacks, etc.) f. Provide incentives to employees to take public transportation, walk, bike, etc. g. Provide pedestrian signalization and signage to improve pedestrian safety. h. Implement on-site circulation design elements in parking lots to reduce vehicle queing and improve the pedestrian environment. i. Provide on-site bicycle and motorcycle parking. Such as providing weather-protected bicycle parking for employees. j. Provide safe, direct access for bicyclists to adjacent bicycle routes.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		k. Provide shower and locker facilities to encourage employees to bike and/or walk to work – typically, one shower and three lockers for every 25 employees. l. Provide on-site eating, refrigeration and food vending facilities to reduce lunchtime trips. m. Increase street tree planting. n. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24. o. Use low emission fleet vehicles such as TLEV, ULEV, LEV, ZEV p. Install an electrical vehicle charging station with both conductive and inductive charging capabilities. q. Use built-in energy efficient appliances, where applicable. r. Use double-paned windows s. Use low energy parking lot and street lights t. Use energy efficient interior lighting. **Discretionary Commercial Energy Efficiency Measures** a. Use roof material with a solar reflectance value meeting the EPA/DOE Energy Star® rating to reduce summer cooling needs. b. Use high efficiency gas or solar water heaters. c. Use built-in energy efficient appliances. d. Use double-paned windows. e. Use low energy parking lot and streetlights (i.e., sodium). f. Use energy efficient interior lighting. g. Use low energy traffic signals (i.e., light emitting diode).	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		h. Install door sweeps and weather stripping if more efficient doors and windows are not available. **COI AQ-1: Enhanced Dust Control Plan** Prior to the commencement of construction for each subsequent development activity or infrastructure improvement, the project applicant shall submit an Enhanced Dust Control Plan to the ICAPCD for approval. The Enhanced Dust Control Plan will identify all sources of PM10 emissions and associated mitigation measures during the construction and operational phases (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Enhanced Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control and address the following parameters as stipulated in ICAPCD *Regulation VIII - Fugitive Dust Control Measures:* a. All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover. b. All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		c. All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. d. The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material. e. All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area. f. Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. g. The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 4.2.3-3: Other emissions, such as odors that adversely affect a substantial number of people.	Less than Significant.	None.	Less than Significant.
Impact 4.2-4: Exposure of sensitive receptors to substantial pollutant concentrations.	Less than Significant.	None.	Less than Significant.
4.3 Biological Resources			
Impact4.3-1: Substantial effect on candidate, sensitive, or special status species.	Potentially Significant.	**MM BIO-1 Pre-Construction Nesting Bird Surveys** Construction activities for any development phase or development activity that would occur under TM 994 or the Specific Plan should commence outside of the peak bird breeding season (generally February 1 through August 31; January for raptors). Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than three (3) days prior to any project-related vegetation removal, site grading, or ground-disturbing activities in accordance with the Migratory Bird Treaty Act and California Fish and Game Code sections 3503, 3503.5, and 3513. Qualified avian biologists are defined as individuals with demonstrated field expertise in ornithology, in particular, nesting behavior and nest detection. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriately sized	Less than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		construction-avoidance buffer (i.e., nest buffer) around the nest to be marked on the ground using flagging or staking. Construction activities will not occur within a construction-avoidance buffer area until the nest is deemed inactive by a qualified biologist. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. The qualified avian biologist will physically delineate the no-work buffers in the field with flagging, fencing, or other appropriate barriers. and construction personnel shall be instructed on the sensitivity of nest areas. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist has determined whether the young have fledged or the nest is no longer active. Active nests and the adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined that the young have fledged or the project activity has been completed. If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws. If occupied nests are found within the Project area or within 500 feet of the Project area, a qualified biologist shall limit construction activities to avoid impacting nests.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		If migratory birds are not detected during the pre-construction survey, no further measures would be required, and construction activities may proceed. **Verification:** Within 14 days prior to the nesting bird survey for any development phase or development activity that would occur under TM 994 or the Specific Plan, the names and credentials of the biologists conducting the survey shall be submitted to the ICPDSD for review and approval. **Reporting:** Within 30 days of the completion of the monitoring efforts, the Project Applicant shall submit a Final Nesting Bird Survey Monitoring Report prepared by the qualified biologist to the ICPDSD and CDFW. The report shall include the time, date, and duration of the survey; identity and qualifications of the surveyor(s); list of species observed; results of the survey; and any designated buffer zones. The report(s) shall contain maps showing the location of all nests, species nesting, status of the nest (e.g., incubation of eggs, feeding of young, near fledging); photographs of habitat areas during pre-construction, and other relevant summary information documenting that general compliance was achieved. **MM BIO-2 Implement a Worker Education and Awareness Program** The Project Applicant for any development phase or development activity that would occur under TM 994 or the Specific Plan, shall retain a qualified biologist to develop and implement a worker education and awareness program (WEAP) to educate on-site workers about each subsequent development activity's sensitive	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		environmental issues. The qualified biologist can be the same as the biologist in MM BIO-1 or it can be an additional biologist. A qualified biologist is an individual who holds a bachelor's degree from an accredited university and 1) is knowledgeable in relevant species' life histories and ecology, 2) can correctly identify relevant species, 3) has conducted field surveys for relevant species and biological resources found in or near the project area, 4) is familiar with relevant survey protocols, and 5) is knowledgeable of state and federal laws regarding the protection of sensitive species. OR has relevant education and experience that demonstrates the ability to carry out the tasks required of a qualified biologist . The resume(s) shall demonstrate to the satisfaction of the ICPDSD the appropriate education and experience to accomplish the assigned biological resources tasks. The WEAP shall be presented by the qualified biologist or a designated biological monitor to all personnel prior to performing any work on-site, including but not limited to surveyors, engineers, inspectors, contractors, subcontractors, supervisors, employees, monitors, visitors, and delivery drivers. If the WEAP presentation is recorded on video, it may be presented by any competent project personnel. The WEAP shall consist of a presentation from a qualified biologist or designated biological monitor with access to the qualified biologist that includes a brief discussion of the biology of the habitats and species identified as expected and/or present at the project site. The WEAP shall also include a brief discussion about the distribution and habitat needs of any protected species that may be	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		present, legal protections for those species, penalties for violations, and Project specific protective measures included in this DEIR. Interpretation shall be provided for non-English- speaking workers, and the same instruction shall be provided for any new workers prior to their performing work on-site. The Permittee shall prepare and distribute wallet-sized cards or a fact sheet that contains this information for workers to carry on-site. Upon completion of the education program, employees shall sign a form stating they attended the education program and understand all protection measures. These forms shall be filed at the worksite offices and be available to the ICPDSD and/or CDFW upon request. The education program shall be repeated annually for any part of the Project extending more than one (1) year. Copies of the education program materials shall be maintained at the Project site for workers to reference as needed. **Verification:** At least 60 days prior to the start of ground-disturbing activities, Project Applicants for any development phase or development activity that would occur under TM 994 or the Specific Plan shall submit the WEAP presentation and associated materials to the ICPDSD and CDFW for review and approval. **MM BIO-3 Invasive Species Education Program** Project applicants shall include a brief invasive species education program for all persons working on the Project prior to the performing any work on-site. The education program shall consist of a presentation from a qualified biologist or designated biological monitor with access to the qualified biologist that includes a brief discussion of the invasive species currently present within the Project site as well as those that may pose a threat to or have the potential to	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		invade the Project site. The brief discussion shall include a physical description of each species and information regarding their habitat preferences, local and statewide distribution, modes of dispersal, and impacts. The education program shall also include a brief discussion of BMPs to be implemented at the Project site to avoid the introduction and spread of invasive species into and out of the Project site. Note: the WEAP presentation shall not exceed 15-20 minutes. The qualified biologist should be consulted immediately if a dead or injured bird is found on site. **MM BIO-4 Artificial Nighttime Lighting** During construction of all phases of the Project and operations during the lifetime of the Project, the County shall ensure that the Project eliminates all nonessential lighting throughout the Project area and avoids or limits the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. The County shall ensure that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). The County shall ensure the use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler. **MM BIO-5 Indirect Noise Impacts** During construction of any development phase, development activity or infrastructure improvement that would occur under TM 994 or the	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Specific Plan, the County shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro hydroelectric systems, or small wind turbine systems. The County shall ensure use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means should be below the 55-60 dB range within 50-feet of the source. **MM BIO-6 Pre-Construction Surveys for Burrowing Owl** A qualified biologist will complete an initial take avoidance survey 14 day**s** prior to ground disturbance activities and within 24 hours prior to ground disturbance activities using the recommended methods described in the Detection Surveys found in the *Staff Report on Burrowing Owl Mitigation, California Department of Fish and Game* (CDFG 2012 or the most recent version). Prior to the initiation of construction activities (i.e., grading, grubbing, clearing, staging, digging), focused burrowing owl surveys shall be conducted by a qualified biologist according to the CDFW Staff Report on Burrowing Owl Mitigation, *California Department of Fish and Game* (CDFG, 2012 or most recent version) for each development area and surrounding 500 ft radius. If work is stopped for longer than 30 days, the area will be resurveyed prior to restarting construction. Take avoidance surveys shall be conducted no less than 14 days prior to the start of project-related activities. Burrowing owls may re-colonize a site after only a few days. Time lapses between Project	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to initiating ground disturbance in accordance with the Staff Report on Burrowing Owl Mitigation, *California Department of Fish and Game* (CDFG 2012 or the most recent version). If the surveys confirm the presence of burrowing owls, active burrows or signs thereof, project activities shall be immediately halted. If impacts to occupied burrowing owl habitat or burrows cannot be fully avoided, consultation with CDFW is warranted to discuss acquiring an Incidental take Permit (ITP) prior to any ground disturbing activities, pursuant Fish and Game Code Section 2081 subdivision (b). Full mitigation often involves the permanent conservation of quality habitat benefiting the species through a conservation easement, along with habitat enhancement and ongoing management funded appropriately. Passive relocation, performed according to the Staff Report on Burrowing Owl Mitigation (CDFG, 2012) may be authorized through the ITP as a minimization measure. If burrowing owl(s) are not detected, construction may proceed. **MM BIO-9 Shelter in Place** If occupied burrows are found but are not in the active construction areas, the occupied burrows can be sheltered in place with appropriate materials under the supervision of a qualified biologist and accordance with the approved Burrowing Owl Plan. If occupied burrows are sheltered, a biological monitor shall monitor areas of active construction; schedule to be determined by qualified biologist. This biologist will ensure that the project complies with these mitigation measures and, after consultation with CDFW, will have the	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		authority to halt activities if they are not in compliance. The biologist will inspect the construction areas periodically for the presence of BUOWs.	
Impact 4.3-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Potentially Significant.	**MM BIO-10 Riparian Habitat Mitigation** Loss of riparian habitat associated with undergrounding the IID canal can be mitigated by reaching out to support the IID Wetlands Mitigation Project or the New River/Alamo Wetlands projects with plant purchases.	Less than Significant.
Impact 4.3-3: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	Potentially Significant.	**MM BIO-11 Section 1602 Lake and Streambed Alteration Agreement** Prior to Project-activities and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the CDFW stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.	Less than Significant.
Impact 4.3-4: Interfere substantially with movement of any native resident or migratory fish / wildlife species,	Potentially Significant.	**MM BIO-1 through MM BIO-6** **MM BIO-7 Implementation of Burrowing Owl Avoidance and Minimization Measures (Burrowing Owl Plan)**	Less than significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
wildlife corridors, or impede the use of native wildlife nursery sites.		Implementation of burrowing owl avoidance and mitigation measures would be triggered by positive owl presence on the site where project activities will occur. The development of avoidance and minimization approaches would be informed by monitoring the burrowing owls prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused take avoidance preconstruction surveys, the qualified biologist and Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, monitoring, passive relocation, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat consistent with the "Mitigation Impacts" section of the *Staff Report on Burrowing Owl Mitigation, California Department of Fish and Game* (CDFW 2012) and shall implement CDFW approved mitigation prior to initiation of Project activities.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. **MM BIO-8 Passive Relocation of Burrowing Owls** If occupied burrows are found on site, and if necessary, the burrows shall be passively relocated by a qualified biologist outside of nesting season and an appropriate number of artificial burrows shall be installed if no acceptable natural burrows are found adjacent to Project site. If possible, these burrows shall be installed as close as possible to the passively relocated burrows. A Burrowing Owl Plan should be prepared to address activities and conservation efforts and submitted to CDFW. **MM BIO-9 through MM BIO 11.**	
Impact 4.3-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Potentially Significant.	**MM BIO-1 through MM BIO-11.**	Less than Significant.
4.4 Energy			
Impact 4.4-1: Cause a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy.	Less than Significant	None	Less Than Significant

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 4.4.2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	Less than Significant	None	Less Than Significant
4.5 Environmental Justice			
Impact 4.5-1: Result high and adverse project impacts that disproportionately affect an Environmental Justice Community	Less Than Significant.	None.	Less Than Significant.
4.6 Greenhouse Gas Emissions			
Impact 4.6-1: Result in the generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	Potentially Significant	**MM 4.16.1 Obtain and Hold Carbon Credits.** The Master Developer or individual builders shall obtain and hold for the duration of project construction, sufficient carbon credits to fully offset construction-phase GHG emissions ("project carbon offsets"). Prior to completion of project construction, the Applicant shall provide proof of participation in a Carbon Offsets Program, which must be provided to the satisfaction of the Imperial County Air Pollution Control District. The Master Developer or individual builders shall prepare a detailed written summary of the project carbon offsets and proof of compliance shall include quantification of emission reduction. The Master Developer or individual builders shall also provide to the Imperial County Air Pollution Control District an independent verification opinion statement(s), from a verification body registered with the California Climate Action Registry, Chicago Climate Exchange, or the CARB, for the credits to be applied**.**	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		At project build-out the Master Developer or individual builders shall purchase carbon offsets to offset the project's CO_2e emissions from operations to a less than significance threshold the Applicant shall provide proof of participation in a Carbon Offsets Program, which must be provided to the satisfaction of the Imperial County Air Pollution Control District. The Master Developer or individual builders shall prepare a detailed written summary of the project carbon offsets and proof of compliance shall include quantification of emission reduction. The Master Developer or individual builders shall also provide to the Imperial County Air Pollution Control District an independent verification opinion statement(s), from a verification body registered with the California Climate Action Registry, Chicago Climate Exchange, or the CARB, for the credits to be applied. The Project applicant is responsible for all costs to determine the emission reductions associated with the projects.	
Impact 4.6-2: Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	Less Than Significant.	None.	Less Than Significant.
4.7 Land Use and Planning			
Impact 4.7-1: Physically divide an established community.	No Impact.	None.	No Impact.
Impact 4.7-2: Cause a significant environmental impact due to a	Less Than Significant.	None.	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.			
4.8 Noise			
Impact 4.8-1: Generation of a substantial temporary or permanent increase in ambient noise levels	Potentially Significant	**Construction Noise Management Plan** **MM 4.10.1a Construction Noise Management Plan - Construction Equipment Mufflers** A Construction Noise Management Plan shall be prepared by a qualified acoustical consultant for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan. The Construction Management Noise Plan shall contain a set of site-specific noise attenuation measures to reduce construction noise to less than 75 dB Leq when averaged over an 8-hour period or to the extent feasible. Construction Noise Management Plan shall require that Construction Contractors equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards for all excavation and grading within the SPA, construction Contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The Construction Contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the site.	Less than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM 4.10.1b Construction Noise Management Plan – Equipment Staging Areas As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities. **MM 4.10.1c Construction Noise Management Plan – Limit Construction Hours** As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall limit all construction-related activities that would result in high noise levels to County-determined hours of construction. **MM 4.10.1d Construction Noise Management Plan – Limit Haul Truck Deliveries** As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall limit haul truck deliveries to the same hours specified for allowable use of construction equipment. To the extent feasible, haul routes shall avoid sensitive land uses or residential dwellings.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Site Specific Noise Analyses **MM 4.10.3a Site Specific Noise Analysis – Commercial Uses** A detailed noise analysis shall be prepared as part of site plan/development plan review for future commercial development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical study may require mitigation measures such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure to adjacent residences, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or constructing noise barriers or enclosures around noisy equipment. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval. **MM 4.10.3c Noise Barrier Plan** The project developer will provide a 10~~9~~-foot- high noise barrier at all residential land uses along Dogwood Road, provide a 7-foot-high noise barrier at all residential areas along McCabe Road, provide a 7-foot-high noise barrier at all residential areas alongSR-86, and provide a 7-foot-high noise barrier at all residential areas along Correll Road to reduce traffic noise to all exterior living areas deemed noise sensitive (see Figure 4.8-2, Noise Barrier Locations). These noise barrier heights would result in future backyard noise levels ranging from 58.1~~59.2~~ to 60.4~~59.9~~ dB CNEL and meet the County of Imperial's exterior 60 dBA noise standard. A Noise Barrier Plan shall be prepared and submitted to the County. Construction of these	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		barriers would reduce noise impacts related to traffic on-site to levels that are considered less than significant. **MM 4.10.4 Site-Specific Noise Analysis – Residential Interior Noise Levels** The required interior noise level reduction for all future residential uses shall be accomplished with a window-closed condition, requiring a means of mechanical ventilation and dual glazed windows with a minimum Sound Transmission Class (STC) rating of 26. Verification of these requirements shall be based upon the final noise study, which is required prior to obtaining building permits. The final noise study shall evaluate the effects of the precise building placement, design, and materials used for construction. **MM 4.10.5 Final Noise Plan - Interior Noise Levels** The California Building Code requires project- specific acoustical analyses to achieve interior noise levels of 45 dBA CNEL or lower in residential units exposed to exterior noise levels greater than 60 dBA CNEL. Building sound insulation requirements would need to include the provision of forced-air mechanical ventilation in noise environments exceeding 60 dBA CNEL, so that windows could be kept closed at the occupant's discretion to control noise. Special building construction techniques (e.g., sound-rated windows and building facade treatments) may be required where exterior noise levels exceed 65 dBA CNEL. These treatments include, but are not limited to sound rated windows and doors, sound rated exterior wall assemblies, acoustical caulking, etc. The specific determination of what treatments are necessary will be conducted on a unit-by-unit basis during project design. Results of the analysis, including the	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		description of the necessary noise control treatments, will be submitted along with the building plans and approved prior to issuance of a building permit. **MM 4.10.7 Site Specific Noise Analysis – Commercial Development** A detailed noise analysis shall be prepared as part of site plan/development plan review for future commercial development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical study may require mitigation measures such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure to adjacent residences, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or constructing noise barriers or enclosures around noisy equipment. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval. **MM 4.10.8 Site Specific Noise Analysis – School Sites** A site-specific acoustical analysis shall be prepared for the two (2) elementary school sites, addressing noise control measures for outdoor school activity noise upon immediately adjacent residential land uses. The acoustical study shall identify appropriate control measures for traffic-related noise sources upon the exterior use areas to ensure that noise levels do not exceed 60 dB CNEL at exterior use areas. Control measures may include physical improvements such as the installation of noise barriers to address traffic noise and	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		operational controls such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or installing enclosures around noisy equipment. The McCabe Union School District and the Heber Elementary School District shall have the responsibility to commission or fund the required acoustical analyses. All required noise control measures identified in the acoustical analyses shall be made conditions of development approval. **MM 4.10.9 Site Specific Noise Analysis – Residential Development** A detailed noise analysis shall be prepared as part of site plan/development plan review for future development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The ~~acoustical~~ noise analysis shall also include an analysis of vibration-related impacts. All required noise control measures identified in the ~~acoustical~~ noise analysis shall be made conditions of development approval.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Vibration Studies/Plans **MM 4.10.10a Noise Vibration Study for Train-Related Noise** A detailed noise vibration study shall be prepared as part of site plan/development plan review for development applications and shall include vibration-related impacts. **MM 4.10.10b Vibration Setback from UPRR Tracks** An 80-foot vibration setback from the UPRR tracks shall be maintained for all structures built for human occupation . The setback shall be measured from the centerline of the tracks. **MM 4.10.10c Vibration Study** Prior to the issuance of building permits for development in the Specific Plan Area , a detailed vibration design study shall be completed to determine more precisely the ground vibration levels and frequency content along the UPRR tracks and to confirm appropriate design to limit interior vibration levels to 80 VdB. **MM NOI-1 Construction Noise Management Plan – Construction Equipment.** As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, electrical power shall be used to run air compressors and similar power tools. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		with temporary noise barriers, such as barriers that meet an STC rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines. **MM NOI-2 Construction Noise Management Plan – Limit Operations Adjacent to Receivers.** As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, the Construction Contractor shall limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time to the extent feasible. **MM NOI-3 Construction Noise Management Plan – Neighbor Notification** As part of the Construction Noise Management Plan, required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, the construction contractor shall designate a noise control monitor to oversee construction operations in proximity to sensitive receivers. The Noise Plan shall also include a requirement for the construction Contractor to provide notification to residential occupants nearest the construction activities at least 7-14 days prior to initiation of construction activities that could result in noise levels exceeding 75 dBA at the property line adjacent to residences. This notification shall include the anticipated hours and duration of	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		construction and a description of noise reduction measures being implemented for the construction activity(ies). The notification should include a telephone number for local residents to call to submit complaints associated with construction noise. A copy of the Neighbor Notification document shall be included in the Noise Control Plan, and submitted to the ICPDSD, prior to grading permit issuance. A copy of the Neighbor Notification document shall also be provided to the ICPDSD concurrent with its distribution to the nearest residential occupants. **MM NOI-4 Construction Noise Management Plan – Noise Monitoring** Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to avoid construction noise levels exceeding 75 dBA Leq at the nearest sensitive receivers. The Construction Noise Management Plan may include the following requirements: • Contractor shall turn off idling equipment; • Contractor shall perform noisier operation during the times least sensitive to receptors; • All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers;	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities. **MM NOI-5 Site Specific Noise Study – Residential Exterior Noise Levels** A site-specific noise study shall be performed for each future development phase, development activity or infrastructure activity or portion thereof, that would occur under TM 994 or the McCabe Ranch II Specific Plan, to determine exterior noise levels at affected on and off-site residential properties to ensure interior noise levels of 45 dBA CNEL or lower are achieved in residential units exposed to exterior noise levels greater than 60 dBA CNEL. The analysis shall include an evaluation of noise barrier specifications required to achieve County of Imperial noise standards. Building sound insulation requirements shall include the use of forced-air mechanical ventilation, so that windows could be kept closed at the occupant's discretion to control noise. Determination of specific treatments shall be conducted on a unit-by-unit basis during project design. Results of the analysis, including the description of the necessary noise control treatments, shall be incorporated into a site/project specific environmental review and be submitted along with the building plans and approved prior to issuance of a building permit. The County shall, at its discretion, determine whether off-site residences affected by project-related traffic noise warrant an evaluation of potential project impacts and mitigation options should impacts be determined potentially significant.	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM NOI-8 Site Specific Acoustical Analysis A site-specific acoustical analysis shall be prepared for the two elementary school sites proposed to address exterior use areas of the site (playground, sports fields, athletic courts, etc.). The acoustical study shall identify appropriate control measures for traffic-related noise sources upon the exterior use areas to ensure that noise levels do not exceed 60 dB CNEL at exterior use areas. Control measures may include physical improvements such as the installation of noise barriers to address traffic noise and operational controls such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or installing enclosures around noisy equipment. All noise control measures required to meet County of Imperial noise standards shall be made conditions of development approval. **MM NOI-6 Detailed Vibration Analysis** A detailed vibration analysis shall be prepared as part of site plan/development plan review for future development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical analysis shall include an analysis of vibration-related impacts. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval.	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 4.8-2: Result in the generation of excessive ground borne vibration or ground borne noise levels	Potentially Significant	**MM 4.10.10a, MM 4.10.10b, MM 4.10.410.c, and NOI-6**	Less than significant
4.9 Public Services			
Impact 4.9-1: Result in substantial adverse physical impacts from new or physically altered governmental facilities, the 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 fire protection, police protection, schools, parks or other public facilities	Potentially Significant	**Fire Protection Services** **MM 4.12.1.1 Construction Traffic Control Plan** For future developments within the McCabe Ranch II Specific Plan Area, a traffic control plan shall be prepared and implemented for each phase of development. The plan shall be submitted to the County of Imperial Public Works Department prior to the initiation of any construction activities and shall include measures to maintain adequate circulation and access for emergency response vehicles. **MM 4.12.1.2a Fair Share Contribution for Additional Fire Protection Services** For future development within the McCabe Ranch II Specific Plan Area, project applicants shall be required to pay a fair share contribution for additional fire facilities, equipment, and staff. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Fire Department.	Less than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Potentially Significant	**Sherrif Protection Services** **MM 4.12.2.2a Fair Share Contribution for Additional Law Enforcement Facilities** For future development within the McCabe Ranch II Specific Plan Area, the developer shall be required to pay a fair share contribution for additional law enforcement facilities, equipment, and staff, including a new sheriff substation. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Sheriff's Office. **MM 4.12.2.2b Sheriff Impact Fees** Sheriff Impact Fees shall be imposed pursuant to Ordinance 1418 Section 2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study (TischlerBise, 2006). The value of impact fees calculated for each proposed project shall be assessed using the formula derived in the study. Specifically, Sheriff Impact Fees for residential development shall be calculated on a per capita basis and then converted to an appropriate amount by type of housing based on persons per housing unit. Sheriff Impact Fees for nonresidential development shall be calculated using nonresidential vehicle trips, as they are the best measure of the presence of people at nonresidential land uses. The Sheriff Impact Fees shall be calculated based on the cost of maintaining the County's current level of service to residential and non-residential development. Fees collected shall only be used to mitigate the conditions created by the development, and such fees shall only be expended on facilities for which the fees	Less than Significant

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		were levied. This ensures that Sheriff Impact Fees will be used only to mitigate the impacts on sheriff service capabilities.	
	Potentially Significant	**School Services** **MM PS-1 Payment of School Impact Fees** For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to pay the applicable school fees in compliance with Government Code Section 53080 or Section 65970 to the Central Union, Heber Elementary and/or McCabe Union School Districts, identified in each district's fee justification study. The payment of required school development fees would reduce the potential increase in demand to less than significant. **MM 4.12.3.1b Compliance with All Other School Related Local, State and Federal Regulations** For future school developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to consult with the applicable school district regarding the district's site sizing requirements, student and staff capacity, and compliance with all other school-related local, state, and federal regulations.	Less than Significant.
	Potentially Significant.	**MM 4.13.1 Parkland Dedication** The proposed Project shall be conditioned to require dedication of a minimum of ~~51.6 acres~~ 60-acres of parkland.	Less than significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Potentially Significant.	**Other Public Facilities (Libraries)** **MM 4.12.4.1 Fair Share Contribution for additional libraries** For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to pay a fair share to assist in the construction of additional library facilities. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Free Library and El Centro Public Library.	Less than Significant
4.10 TRANSPORTATION/TRAFFIC[1]			
Impact 4.10-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Less Than Significant.	**MM TR.1: Project Phase 1 Improvements** ***INTERSECTIONS*** **MM TR-1.1: Aurora Drive / 8th Street (Intersection 5)** Contribute a fair share (2.6%) towards signalization of this intersection. **MM TR-1.2: W McCabe Road / Austin Road (Intersection 18)** An unacceptable LOS occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School in which is	Less Than Significant.

[1] See Section 4.13 of the Supplemental EIR for a discussion of CEQA Guidelines section 15064.3, subdivision (b) and vehicle miles travelled.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		anticipated to be construct during Phase 2. However, if the Project continues to contribute to the unacceptable LOS once the future McCabe Elementary School construction is complete, then the Project shall contribute a fair share (4.9%) towards signalization of this intersection and restriping the eastbound and widening the westbound approaches to include a dedicated left-turn lane and a shared through/right-turn lane. **MM TR-1.3: W McCabe Road / La Brucherie Road (Intersection 19)** The unacceptable LOS at this intersection during Phase 1 occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School, scheduled to be built on the Project site during Phase 2. However, if the Project continues to contribute to the unacceptable LOS once the McCabe Elementary School is built, then the Project shall contribute a fair share (5.1%) towards signalization of this intersection, widening the westbound approach to include one westbound right-turn lane, and widening the southbound approach to include one left-turn lane. **MM TR-1.4: W McCabe Road / Clark Road (Intersection 20)** The unacceptable LOS at this intersection during Phase 1 occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School, scheduled to be built on the Project site during Phase 2. However, if the Project continues to contribute to the	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		unacceptable LOS once the McCabe Elementary School is built, then the Project shall contribute a fair share (6.1%) towards signalization of this intersection and widening the westbound approach to include a dedicated left-turn lane and shared through/right-turn lane. **MM TR-1.5: Dogwood Road / Black Hills Road / Project Driveway F (Intersection 31)** This intersection/project access driveway shall be installed during Phase 1 development and shall be signalized. **MM TR-1.6: Heber Road / Dogwood Road (Intersection 36) (Caltrans jurisdiction)** Contribute a fair share (8.0%) towards signalization of this intersection to ensure the following improvements: • Northbound: one left-turn lane, two through lanes, and one right-turn lane • Southbound: one left-turn lane, two through lanes, and one right-turn lane • Eastbound: one left-turn lane, one through lane, and one right-turn lane • Westbound: one left-turn lane, one through lane, and one right-turn lane	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		STREET SEGMENTS **MM TR-1.7: Dogwood Road between McCabe Road and Heber Road** Provide right-of-way to six-lane Prime Arterial standards and construct improvements to four-lane Minor Arterial standards for the portion fronting the Project site. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, contribute a fair share of 13.3% towards four- lane Minor Arterial standards. In addition, the recommended intersection improvement at the Heber Road / Dogwood Road intersections would improve the operations along this street segment. **MM TR-2: Project Phase 2 Improvements** ***INTERSECTIONS*** **MM TR-2.1: Ross Avenue / Dogwood Road (Intersection 4)** Contribute a fair share (17.6%) towards restriping the eastbound and westbound approaches to include a dedicated left-turn lane. Also install an overlap phase on the eastbound right-turn movement. **MM TR-2.2: I-8 EB Ramps / SR-86 (Intersection 9) (*Caltrans jurisdiction*)** Contribute a fair share (20.1%) towards widening the southbound approach to include one additional southbound left-turn lane. **MM TR-2.3: Wake Ave / SR-86 (Intersection 13) (*Caltrans jurisdiction*)**	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Contribute a fair share (26.3%) towards widening the southbound approach to include an additional southbound left-turn lane. **MM TR-2.4: W McCabe Road / Farnsworth Lane / Project Driveway A (Intersection 22)** Signalize the intersection and provision of the following improvements: • Northbound: one left-turn lane, one shared through/right-turn lane • Southbound: one left-turn lane, one shared through/right-turn lane • Eastbound: one left-turn lane, one through lane, and one right-turn lane • Westbound: one left-turn lane, one shared through/right-turn lane ***STREET SEGMENTS*** **MM TR-2.5: SR-86 between McCabe Road and Heber Road (Caltrans jurisdiction)** Provide right-of-way to six-lane Prime Arterial standards and construct improvements to four-lane Minor Arterial standards for the portion fronting the Project site. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM TR-2.6: McCabe Road between La Brucherie Road and Clark Road **MM TR-2.7: McCabe Road between Farnsworth Lane and Dogwood Road** Provide right-of-way to six-lane Prime Arterial standards and construct improvements for four-lane Minor Arterial standards for the portion fronting the Project site. This configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards. In addition, the recommended intersection improvement at and the W McCabe Road / Farnsworth Lane / Project Driveway A intersection (MM TR-2.5) would improve the operations along this street segment. **MM TR-3: Project Phase 3 Improvements** ***INTERSECTIONS*** **MM TR-3.1: Ross Avenue / SR-86 (Intersection 3) (Caltrans jurisdiction)** Contribute a fair share (24.7%) towards widening the eastbound and westbound approaches to provide dedicated left-turn lanes. **MM TR-3.2: Dogwood Road / Project Driveway C (Intersection 28)** Limit driveway to right-turn in/right-turn out only.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM TR-3.3: Correll Road / Dogwood Road Contribute a fair share of 37.2% towards widening the westbound approach to include a dedicated right-turn lane and install an overlap phase on the eastbound and westbound right-turn movements. ***STREET SEGMENTS*** **MM TR-3.5: McCabe Road between Clark Road and SR-86** Contribute a fair share of 11.7% toward the construction of improvements for four- lane Minor Arterial standards. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. The recommendation for a four-lane Minor Arterial was included in the previously approved EIR. In addition, the recommended intersection improvement at the W McCabe Road / Clark Road intersection (**MM TR-1.4**) would also improve the operations along this street segment. **MM TR-3.6: McCabe Road between SR-86 and Farnsworth Lane** Provide right-of-way to six- lane Prime Arterial standards and construct improvements for four-lane Minor Arterial standards for the portion fronting the Project site. This configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards. In addition, the	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		recommended intersection improvement at the W McCabe Road / Farnsworth Lane / Project Driveway A (**MM TR-2.4**) would improve the operations along this street segment. **MM TR-4: Phase 4 Improvements** Based on the analysis, the following improvements are recommended to accommodate Phases 1, 2, 3+ Phase 4 (Specific Plan Buildout) traffic volumes. These improvements, once implemented, would improve efficiency of traffic flow and return intersection operations to an acceptable level. As previously noted, the Phase 4 parcels may develop either prior to, concurrent with, or subsequent to the development of the Phases 1, 2 and 3 (TM 994 Buildout). The Phase 4 mitigation measures reflect this potential development sequencing. ***INTERSECTIONS*** **MM TR-4.1: Ross Avenue / SR-86 (Intersection 3)** ***(Caltrans jurisdiction)*** The Phase 3 improvement (**MM TR-3.1**) would improve the operations to an acceptable level. MM TR-4.2 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.2: Ross Avenue / Dogwood Road (Intersection 4)** The Phase 2 improvement (**MM TR-2.1**) would improve the operations to an acceptable level. MM TR-4.2 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.3: Aurora Drive / 8th Street (Intersection 5)** The Phase 1 improvement (**MM TR-1.1**) would improve the operations to an acceptable level. MM TR-4.3 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.4: I-8 WB Ramps / SR-86 (Intersection 8)** ***(Caltrans jurisdiction)*** Contribute a fair share of 52.7% towards widening the northbound approach to include one additional northbound left-turn lane. **MM TR-4.5: I-8 EB Ramps / SR-86 (Intersection 9)** ***(Caltrans jurisdiction)*** The Phase 2 improvement (**MM TR-2.2**) would improve the operations to an acceptable level. MM TR-4.5 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.6: Wake Ave / SR-86 (Intersection 13)** ***(Caltrans jurisdiction)*** The Phase 2 improvement (**MM TR-2.3**) would improve the operations to an acceptable level. MM TR-4.6 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.7: Danenberg Drive / Farnsworth Lane (Intersection 16)** Install all-way stop-control. **MM TR-4.8: W McCabe Road / Austin Road (Intersection 18)** The Phase 1 improvement (**MM TR-1.4**) would improve the operations to an acceptable level. MM TR-4.8 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.9: W McCabe Road / La Brucherie Road (Intersection 19)** The Phase 1 improvement (**MM TR-1.3**) would improve the operations to an acceptable level. MM TR-4.19 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.10: W McCabe Road / Clark Road (Intersection 20)** The Phase 1 improvement (**MM TR-1.4**) would improve the operations to an acceptable level. MM TR-4.10 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.11: W McCabe Road / SR-86 (Intersection 21)** ***(Caltrans jurisdiction)*** Contribute a fair share of 86.1% towards provision of the following improvements: • Northbound: one left-turn lane, one through lane, and one right-turn lane • Southbound: one left-turn lane, one through lane, and one right-turn lane • Eastbound: one left-turn lane, one through lane, and one right-turn lane • Westbound: one left-turn lane, one through lane, and one right-turn lane **MM TR-4.12: W McCabe Road / Farnsworth Lane / Project Driveway A (Intersection 22)** The Phase 2 improvement **(MM TR-2.7**) would improve the operations to an acceptable level. MM TR-4.12 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM TR-4.13: Dogwood Road / Project Driveway C (Intersection 28) The Phase 3 improvement (**MM TR-3.2**) would improve the operations to an acceptable level. MM TR-4.13 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.14: Dogwood Road / Project Driveway E (Intersection 30)** Signalize the intersection. **MM TR-4.15: Dogwood Road / Black Hills Road / Project Driveway F (Intersection 31)** The Phase 1 improvement (**MM TR-1.7**) would improve the operations to an acceptable level. MM TR-4.15 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.16: Correll Road / Dogwood Road (Intersection 34)** The Phase 3 improvement (**MM TR-3.2**) would improve the operations to an acceptable level. MM TR-4.16 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		calculated, and Phase 4 would be required to assume its share of responsibility. **MM TR-4.17: Heber Road / Dogwood Road (Intersection 36)** ***(Caltrans jurisdiction)*** The Phase 1 improvement (**MM TR-1.6**) would improve the operations to an acceptable level. MM TR-4.17 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility. ***STREET SEGMENTS*** None. **MM 4.14.6 Off-Street Parking** Prior to the approval of any subsequent projects within the McCabe Ranch II Specific Plan area, subsequent project-level planning and/or environmental review shall be conducted for each project to ensure the number of off-street parking spaces provided is consistent with the requirements in Imperial County Code of Ordinances Title 9, Division 4, Chapter 2 Off-Street Parking. ~~evaluate the subsequent projects' impact on parking capacity and identify mitigation measures, as appropriate~~	
Impact 4.10-2: Substantially increase hazards due to a geometric design feature or incompatible uses.	Less Than Significant.	**MM 4.14.4 – At-grade Crossing of UPRR at Dogwood Road and McCabe Road** An at-grade crossing shall be constructed where Dogwood Road and McCabe Road cross the Union Pacific Railroad tracks. The Imperial County Public Works Department, Planning and Development	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Services Department and the Union Pacific Railroad will jointly assess and determine pedestrian-focused solutions. The crossing will implement all applicable and feasible safety rules, including horn sounding requirements at all public at-grade highway-rail crossings, marked pedestrian pathways, fencing and slowing devices.	
Impact 4.10-3: Result in inadequate emergency access.	Potentially Significant.	**MM4.14.5a: Emergency Access Planning** The proposed Project, and all subsequent projects, would be subject to review by the Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies regarding adequate emergency access. **MM 4.14.5b: Emergency Access** The proposed Project and all subsequent projects would incorporate adequate emergency access locations as required by the County Fire Department. Prior to final site plan approval, the County will coordinate with the County Fire Department to ensure adequate circulation and accesses have been incorporated into each project's final site plan.	Less Than Significant.
4.11 Tribal Cultural Resources			
Impact 4.11-1: Cause a substantial adverse change in the significance of a tribal cultural resource.	Potentially Significant.	**MM-CUL-1: Prepare and Implement a Cultural Resource Mitigation and Monitoring Plan.** • Prior to issuance of a grading permit for any future development phase, development activity or infrastructure improvement that would occur under TM 994 or the Specific Plan, the Project	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Applicant shall retain a qualified archaeologist2 to prepare a Cultural Resource Mitigation and Monitoring Plan (CRMMP), which shall be submitted to and approved by the Imperial County Planning and Development Services Department (ICPDSD). The purpose of the CRMMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b), and to lay out a detailed program of mitigation for direct and indirect impacts on cultural resources during project implementation. The mitigation and monitoring plan shall identify procedures for monitoring and the implementation of a discovery plan in coordination with affected Tribal groups and include the following at a minimum: – List of personnel involved in the monitoring activities; – Inclusion of involvement of the Native American community, as appropriate; – Description of the worker awareness program that shall be implemented; – Description of how the monitoring shall occur; – Description of frequency of monitoring (e.g., full-time, part time, spot checking); – Description of resources expected to be encountered (if any);	

[2] Meeting the Secretary of the Interior's Professional Standards published in Appendix A of 36 CFR Part 61.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		– Description of circumstances that would result in the halting of work at the project site. • Description of procedures for halting work on the site and notification procedures including the notification of the Applicant, the ICPDSD, and tribal representatives within 24 hours of the inadvertent discovery of archaeological resources; and • Description of monitoring reporting procedures. The project's grading and construction plans and specifications shall state that full-time monitoring by a qualified archaeologist shall be conducted during the initial grubbing and ground disturbance for the Project. In the event that archaeological resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies). **MM-CUL-2: Cultural Resources Construction Monitor.** The Applicant for all future development activities shall retain qualified archaeological monitors and a traditionally and culturally affiliated (TCA) Native American Monitor for all ground-disturbing activities associated with the Project. Native American tribes shall be given the opportunity to provide one or more certified cultural monitors for the Project during all excavation or earth-moving within	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the Project site in Holocene-aged deposits. The Construction Contractor shall give the tribe's Historic Preservation Officer (THPO) or other designated representative two weeks' advanced notice of the monitoring opportunity and shall provide a copy of such notice to the County. If a significant cultural resource site is found during ground-disturbing activities the resource will be protected in place, or data recovery will be initiated, consistent with the mitigation and monitoring plan required by **MM-CUL-1**. **MM CUL-3: Human Remains.** Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, California Public Resources Code §5097.98, and California Code of Regulations (CCR) §15064.5(e). Should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC. **MM CUL-4: Disposition of Tribal Cultural Resources.** The landowner shall relinquish ownership to the TCA tribe all tribal cultural resources collected during the cultural resource mitigation monitoring conducted for all future development activities for respectful and dignified treatment and disposition, including reburial, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98. **MM CUL-5: Unanticipated Discoveries Historic Properties Treatment Plan/Data Recovery Plan** Should an unanticipated discovery be made, avoidance is the preferred treatment (CEQA Guidelines, Section 15126.4(b)(3)(A)), but if the site cannot be avoided in place, then the site will be further evaluated. Immediately upon discovery of a find, a qualified archaeologist will evaluate the significance of the newly discovered site or unanticipated discovery along with attempted consultation with designated Native American representatives in order to provide proper management recommendations. If testing and evaluation of the site is recommended, the qualified archaeologist shall prepare a research design, schedule, and budget for review and approval by the County and the Applicant. During	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		evaluation and testing, the appropriate Native American tribe shall be notified in advance so that a tribal monitor can be present and assist with the work being conducted. At the completion of the monitoring program, the qualified archaeologist shall prepare a monitoring report that describes the project, the personnel used, the dates of performance, and results. If cultural resources are recovered and cannot be preserved in place, they shall be cleaned, catalogued, analyzed, reburied in a nearby area after consultation or curated at the California Historical Resources Regional Information Center. **MM CUL-6: Prepare Final Monitoring Report and/or Evaluation Report.** Prior to the release of the grading bond for all future development activities and no later than 90 days after monitoring has been completed, a Final Monitoring Report and/or Evaluation Report (Final Report) shall be completed. This report shall describe the results, analysis and conclusions of the cultural resource mitigation monitoring efforts such as, but not limited to, the Research Design and Data Recovery Program. It will also include a list of project personnel, a catalog of any cultural resources that were identified, any associated DPR 523 Forms and/or confidential maps, details of the location of the final disposition of cultural resources (if any), any issues or problems that occurred during monitoring, and any other pertinent information. The Final Report shall be submitted by the project archaeologist, along with the notes and comments from the TCA Native American Monitor(s), to the Imperial County Planning and Development Series Dept. (ICPDSD) for review and approval. Upon approval by the ICPDSD, a complete Final Report shall be	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		submitted to the appropriate Information Center, and TCA Tribes, any relevant curation facility, and the landowner/applicant.	
Impact 4.11-2: Cause a substantial adverse change in the significance of a tribal cultural resource.	Potentially Significant.	**MM CUL-1 through MM CUL-6**	Less Than Significant.
4.12 Utilities and Service Systems			
Impact 4.12-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant.	**MM 4.15.1.1a Heber Public Utility District Fair Shair Contribution – Water Infrastructure** The McCabe Ranch II Specific Plan Area future developers shall go through a three-phase process with the HPUD that includes contributing fair-share payments for the infrastructure and a budgetary estimate of the total cost of the new infrastructure. The project applicant shall also work in coordination with the County of Imperial to build adequate water lines to connect with the HPUD lines or to convey the water demand from the project. **MM 4.15.1.1b Installation of Public Improvements** The project conditions of approval will require that the developer build the identified public improvements no later than after issuance of 30% of the Certificates of Occupancy of each phase of the tract map. The County will not permit a "pushing back" of public improvements to a later phase. Each of the phased final maps will include a certain amount of public improvements (to be determined by the County and the HPUD) which must be completely installed no later than at the 30% buildout of the phased final map. The Developer	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		will be required to maintain the public improvement during the build-out phase and two years after the final Certificate of Occupancy has been issued. When the public improvements are turned over to the County or HPUD, the Developer will put up a one-year bond for 15% of the entire improvement cost for unforeseen maintenance issues. **MM 4.15.1.2 Heber Public Utility District Fair Shair Contribution – Sewer Infrastructure** The McCabe Ranch II Specific Plan Area future developers shall go through a three-phase process with the HPUD that includes contributing fair-share payment for the infrastructure and a budgetary estimate of the total cost of the new infrastructure. The project applicant shall also work in coordination with the County of Imperial to build adequate water lines to connect with the HPUD lines or to convey the water demand from the project. **MM 4.15.1.3 Proof of Service Agreements** For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall provide proof of agreement to service the project area with electrical service to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from the IID specifically stating their ability and willingness to serve the project site with electrical service. Any requirements contained in the agreement/letter shall be included as conditions of approval on all building permits issued for the proposed project. The applicant shall ensure any conditions of approval are carried out prior to project area buildout.	

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM 4.15.3.2 For future developments within the McCabe Ranch II Specific Plan Area, the Project Applicant shall provide proof of agreement to service the project area from SCGC to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from SCGC specifically stating their ability to serve the project site with natural gas service. Any requirements contained in the agreement/letter shall be included as conditions of approval on all building permits issued for the proposed project. The applicant shall ensure any conditions of approval are carried out prior to project area buildout. **MM 4.15.3.3** For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall provide proof of agreement to service the Project area from AT&T and Adelphia Cable, or current franchise provider, to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from each service provider specifically stating their ability to serve the project site with telephone and cable services, respectively. Any requirements contained in the agreements/letters shall be included as conditions of approval on all building permits issued for the proposed project. The Applicant shall ensure any conditions of approval are carried out prior to project area buildout.	
Impact 4.12-2: Have sufficient water supplies to serve the project.	Less Than Significant.	None.	Less Than Significant.

TABLE 1-1: SUPPLEMENTAL ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 4.12-3: 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.	Potentially Significant	**Mitigation Measure 4.15.1.1b and Mitigation Measure 4.15.1.2.**	Less than Significant
Impact 4.12-4: 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.	Less Than Significant.	None.	Less Than Significant.
Impact 4.12-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	No Impact.	None.	No Impact.

1.6. Effects Not Found To Be Significant

Several environmental topics were found to be less than significant without mitigation including aesthetics, agriculture and forestry resources, energy, mineral resources, population and housing, public services, recreation, and wildfires. These topics are described in Chapter 8.0, Effects Not Found to be Significant.

1.7. Areas Of Controversy

Pursuant to CEQA Section 15123(b)(2), an EIR shall identify areas of controversy known to the lead agency, including issues raised by the agencies, and the public, and issues to be resolved. The NOP for the EIR was distributed on December 26, 2019. The 35-day public review and comment period began on December 26, 2019, and a scoping meeting was held on January 9, 2020. Public comments were received on the NOP that reflect controversy on several environmental issues.

Issues of controversy raised include concerns related to hazardous materials, biological resources, and hydrology and water quality. The NOP and comment letters received are included in this EIR as Appendix A-1.

1.8. Issues to Be Resolved by the Decision-Making Body

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which includes the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the EIR adequately describes the environmental impacts of the proposed Project;
- Choose among the Project alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the proposed Project.

1.9 Summary of Alternatives

The Alternatives section (Chapter 7.0) of this EIR focuses on alternatives capable of avoiding or substantially lessening any of the significant effects of the Project, even if the alternatives would impede, to some degree, the attainment of project objectives. The Alternatives section discusses project alternatives that were determined to represent the range of reasonable alternatives to the Project that have the potential to feasibly attain most of the basic Project objectives, but which may avoid or substantially lessen one or more the Project's significant effects. A brief summary is provided below.

1.9.1. No Project/No Expansion Alternative (Alternative 1)

Under this alternative, the Proposed Project would not occur, and the monofill would not be expanded to provide a new Cell 4. Operations of the monofill would continue as authorized under the existing conditional use permit, solid waste facility permit and waste discharge report. Permitted non-hazardous geothermal waste from CalEnergy geothermal plants would continue to be disposed of within Cell 3, until its capacity is reached in January 2025. After that Cell 3 would be closed in compliance with the Preliminary Closure and Post Closure Maintenance Plan. Once Cell 3 reaches capacity, the landfill cap will be installed, which will require four to six months to complete. All structures involved in the security, monitoring and maintenance and all existing environmental control (vadose zone monitoring wells, groundwater monitoring wells, ambient air monitoring stations, etc.) will remain in place during the post-closure period and will be maintained in accordance with the approved Closure Plan.

Implementation of the No Project Alternative would avoid environmental impacts to biological resources, cultural and tribal resources, geology/soils (paleontological resources); and hydrology and water quality. However, the No Project Alternative could also result in greater long-term impacts associated with air quality, GHG emissions and traffic/transportation due to the increased waste haul route would be significant impacts. The No Project Alternative would not satisfy any of the Project objectives.

1.9.2 Fencing Date Draft No. 3 and Dogwood Lateral Conal No. 2 (Alternative 2)

Due to the presence of western burrowing owls within the Imperial Irrigation District (IID) right-of-way, an alternative was evaluated that would avoid undergrounding those portions of the Data Drain No. 3 and Dogwood Lateral Canal No. 2 that traverse the TM area. Instead, Alternative 2 consists of installing fencing outside the IID right-of-way around the Date Drain No. 3 and the Dogwood Lateral Canal No. 2 between McCabe Road and Correl Road. The analysis assumed the fencing material would either be chain-link fencing or wrought-iron fencing, six (6) feet in height, and would be approved by IID prior to installation.

1.9.3 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The context of an environmentally superior alternative is based on consideration of several factors, including the project's objectives and the ability to fulfill the goals while reducing potential impacts to the environment.

Table 1-2 summarizes the potential impacts of the alternatives evaluated as compared to the potential impacts of the Project. As shown in **Table 1-2**, Alternative 1 (No Project/No Build), would be environmentally superior to the proposed Project for all resource areas analyzed in the Draft SEIR. As required by CEQA, the next environmentally superior alternative is Alternative 2 (Fencing

Date Drain No. 3 and Dogwood Lateral Canal No. 2 Thru TM 994. Alternative 2 would be environmentally superior to the proposed Project under 1 resource areas and environmentally similar to the Project under 10 resource areas.

TABLE 1-2: SUMMARY OF ALTERNATIVES COMPARED TO THE PROPOSED PROJECT

Environmental Resource	Proposed Project	No Project/ No Project (Alternative 1)	Fencing Date Drain No. 3 / Dogwood Lateral Canal No. 2 Thru TM 994 (Alternative 2)
1. Air Quality	**LTS-MM**	**NI / +**	**LTS-MM / =**
2. Biological Resources	**LTS-MM**	**NI / +**	**LTS-MM /+**
3. Energy	**LTS**	**NI / +**	**LTS / =**
4. Environmental Justice	**LTS**	**NI / +**	**LTS / =**
5. Greenhouse Gas Emissions	**LTS**	**NI / +**	**LTS / =**
6. Land Use and Planning	**LTS**	**NI / +**	**LTS / =**
7. Noise	**LTS-MM**	**NI / +**	**LTS-MM/ =**
8. Public Services	**LTS-MM**	**NI / +**	**LTS-MM/ =**
9. Transportation and Traffic	**LTS-MM**	**NI / +**	**LTS / =**
10. Tribal Cultural Resources	**LTS-MM**	**NI / +**	**LTS-MM / =**
11. Utilities and Service Systems	**LTS-MM**	**NI / +**	**LTS-MM / =**
TOTALS		**+ 11 - 0 = 11**	**+ 1 - 0 = 10**
Meets Most of the Basic Project Objectives?	**Yes**	**No**	**Yes**

Notes:

NI	Finding of no environmental impact.
LTS	Finding of less than significant environmental impact.
LTS-MM	Finding of less than significant environmental impact with mitigation measure.
SU	Finding of significant and unmitigable impact.
+	Alternative is superior (reduced impacts compared) to the proposed Project.
-	Alternative is inferior (greater impacts compared) to the proposed Project.
=	Alternative is environmentally similar to the proposed Project.

2.0 INTRODUCTION AND BACKGROUND

The purpose of a Supplemental Environmental Impact Report (SEIR) is to assess the change in the environmental significance conclusions and/or mitigation measures originally identified in the previously certified Environmental Impact Report for the McCabe Ranch II Specific Plan (Certified EIR), State Clearinghouse No. 2008111037, attributable to either: 1) changes in the project; 2) changes in the circumstance under which the project is undertaken; or 3) the introduction of new information of substantial importance that was not known at the time the previous EIR was certified. The reason for preparation of this SEIR primarily relates to the first two conditions (i.e., changes in a project and changes in circumstances under which the project is taken), because the current proposals differs from the project that was approved as part of the *McCabe Ranch II Specific Plan Final Environmental Impact Report, State Clearinghouse No. 2008111037* (Certified EIR). Additionally, since the Imperial County Board of SupervisorsCertified EIR in December 2010, numerous laws, ordinances, regulations, standards, plans and policies applicable to the project have been introduced, updated and/or revised. These regulatory changes represent a change in circumstances under which the project would be taken. The scope of this SEIR focuses on a comparison between the physical environmental effects described and evaluated in the Certified EIR for the McCabe Ranch II Specific Plan and those that would result from the proposed McCabe Ranch II Subdivision Tract Map 994 and Specific Plan Amendment (Project or proposed Project).

A brief summary of the proposed changes are provided in this chapter, along with a discussion of the process undertaken and the determinations reached by the County of Imperial (County) governing why this SEIR is being prepared. A detailed discussion of the proposed Project is contained in Chapter 3.0, Project Description.

2.1. Proposed Changes to the Approved Project

In 2010, the McCabe Ranch II Specific Plan (SP07-004) established a comprehensive framework for the phased development of approximately 468 acres within the Specific Plan Area (SPA), encompassing a diverse mix of land uses. The McCabe Ranch II Specific Plan proposed development of a maximum of 2,300 single- and multiple-family dwelling units; 51.6-acres of parks and open space; an 8.4-acre business park; 3.2 acres of commercial uses; two (2) elementary school sites for the McCabe Unified and Heber Unified School Districts (28.5 acres combined) and associated public improvements within the McCabe Ranch II SPA [(1)].

In 2025, McCabe Ranch Realty, LLC, (Applicant or Project Applicant) seeks to process a Subdivision Tract Map that would accommodate phased development within a 351-acre portion of the SPA. The proposed McCabe Ranch II Subdivision Tract Map 994 (McCabe Ranch II TM 994 or TM 994) would not change the boundaries of the specific plan; general land uses; or development densities in comparison to the approved McCabe Ranch II Specific Plan (Specific Plan). Instead, the

[1] Source: McCabe Ranch II Specific Plan, Table 2-1, Land Use Summary. County of Imperial, 2010.

proposed TM 994 would modify the distribution of residential and park/open space uses within the Specific Plan's boundaries. It also modifies the lot layout, lot sizes (i.e., square footage), and the phasing of development for the planned residential and park areas. Additionally, TM 994 proposes to modify the Specific Plan's internal roadway system and vehicle access points. These changes will require an amendment to the approved Specific Plan. Additionally, the project applicant proposes to annex the Specific Plan Area into the Heber Public Utility District (HPUD) to provide sewer, water, park maintenance, as well as landscape and lighting maintenance services to the SPA. In total, these three (3) actions represent the proposed project (proposed Project or Project) in this Supplemental EIR:

- McCabe Ranch II Tentative Tract Map 994
- Amendment to McCabe Ranch II Specific Plan
- Annexation to HPUD

The proposed Project also modifies the size of proposed single-family residences (i.e., building square footage); facilitates flexibility for the provision of gated or non-gated residential neighborhoods depending on market conditions; adds an Imperial Irrigation District (IID) electrical substation within the proposed tract map area; and proposes a new internal circulation system aligned with TM 994's lot layout. Moreover, the Specific Plan amendment corrects the Specific Plan's total acreage from 457-acres to ±468.2-acres.

2.2. Supplement to the Approved Specific Plan EIR

The purpose of this document is to evaluate proposed changes to the project that was originally analyzed in the McCabe Ranch II Specific Plan Final EIR certified by the County in 2010 (Certified EIR) and to demonstrate that an SEIR is the appropriate document under the California Environmental Quality Act (CEQA) in accordance with Public Resources Code (PRC) Section 21000 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Section 1500 et seq.) to evaluate these changes.

The McCabe Ranch II Specific Plan Final EIR was certified by the County of Imperial as the Lead Agency under CEQA. In accordance with CEQA Guidelines (Sections 15162 and 15163), this Supplement to the Certified EIR has been prepared in order to address the potential environmental impacts of the proposed changes in the Project. To determine whether the proposed Project is eligible for the preparation of an SEIR, the criteria in Section 15162 governing preparation of Subsequent Documents and the additional criteria in Section 15163 governing preparation of Supplemental Documents must be met, as follows:

1. There are no substantial changes in the project which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects (Section 15162).

2. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects (Section 15162).

3. There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified that shows any of the following (Section 15162):

   (a) The project will have one or more significant effects not discussed in the previous EIR.

   (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR.

   (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

   (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

4. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation (Section 15163).

As stated in Section 15163 of the CEQA Guidelines, the Lead Agency may choose to prepare a Supplemental EIR rather than a Subsequent EIR if:

1. Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

The County has determined that CEQA requires preparation of a Supplemental EIR, rather than a Subsequent EIR, because all of the conditions in Section 15163 regarding preparation of a Supplemental EIR can be met, including minor changes to the Certified EIR necessary to make it adequately apply to the proposed Project. An SEIR need only contain the information necessary to make the previous EIR adequate for the project as revised (Section 15163).

Additionally, an SEIR may be circulated in accordance with CEQA Section 15087 by itself without recirculating the previous Draft or FEIR. When the Lead Agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the SEIR. A finding under Section 15091 must be made for each significant effect shown in the previous EIR as revised in the SEIR.

2.3. Issues to be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which includes the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the SEIR adequately describes the environmental impacts of the proposed Project;
- Choose among the Project alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the proposed Project.

2.4. Environmental Review Process

CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of the project being proposed and the extent and types of impacts that the proposed Project and its alternatives would have on the environment should the proposed Project or alternatives be implemented. The CEQA review process allows interested parties to share expertise, discuss the analyses, check for accuracy, detect omissions, discover public concerns, and solicit mitigation measures and alternatives capable of avoiding or reducing the significant effects of a project, while still attaining most of the basic objectives of the proposed Project.

The CEQA process for this SEIR includes:

- Preparation of an Initial Study which determined that the proposed Project requires preparation of an SEIR;
- Filing and distribution of the Notice of Preparation;
- Holding a CEQA public agency scoping meeting;
- Preparation of the Draft SEIR;
- Release of the Draft SEIR for public review;
- Preparation and release of the Final SEIR, including responses to comments on the Draft SEIR.

2.4.1. Notice of Preparation and Initial Study

In accordance with Section 15082 of the CEQA Guidelines, the ICPDSD issued a Notice of Preparation (NOP) of a Supplemental EIR for the Project and an accompanying Initial Study (SCH No. 2024050879), which are included in Appendix A-1 within Volume II (Technical Appendices) of this SEIR. The NOP was published in the Imperial Valley Press newspaper and was submitted to federal, state, and local agencies, special districts, California Native American Tribes and other interested parties for a 35-day public review period. The public review period for the NOP began on May 20, 2024, and ended on June 24, 2024.

In response to the NOP, the County received comment letters from eight (8) public agencies and one individual. **Table 2-1** summarizes all comments received during the public scoping.

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
PUBLIC AGENCY COMMENTS	
A. California Dept. of Fish and Wildlife, Kim Freeburn, Environmental Program Manager, June 21, 2024	
DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project including:	Section 4.3, Biological Resources
1. An assessment of habitats within the project footprint and adjoining areas, and a map identifying their locations	Section 4.3, Biological Resources
2. A general biological inventory of fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat. CDFW's CNDDB should be contacted.	Section 4.3, Biological Resources
3. A complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and within offsite areas with the potential to be affected. The inventory should address seasonal variations in use of the site. Focused species-specific surveys, completed by a qualified biologist, are also required.	Section 4.3, Biological Resources
CDFW considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for up to three years. Some aspects of the project may warrant periodic updated surveys particularly if the Project is proposed to occur in phases.	Section 4.3, Biological Resources
Burrowing Owl (Athene cunicularia): • The Project site has the potential to provide foraging and/or nesting habitat for burrowing owl. • Imperial County should follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation (Department of Fish and Game, March 2012*).	Section 4.3, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• Mitigation for permanent impacts to nesting, occupied, and satellite burrows and habitat should be on lands adjacent or proximate to the impact site. • Off-site mitigation should include (a) permanent conservation of similar vegetation communities and (b) be sufficiently large acreage with the presence of fossorial mammals.	
4. A thorough, recent, floristic-based assessment of special status plants and natural communities should be conducted, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.	Section 4.3, Biological Resources
5. Information on the regional setting should be included (CEQA Guidelines § 15125[c]).	Section 4.3, Biological Resources
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.	Section 4.3, Biological Resources
<u>Analysis of Direct, Indirect & Cumulative Biological Resources Impacts</u> The DEIR should provide a discussion of the direct, indirect, and cumulative impacts to biological resources including: 1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions. 2. A discussion of indirect impacts on biological resources, including resources in adjacent areas, such as public lands, National Forests, State Parks, open space, natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation land. 3. An evaluation of impacts to adjacent open space lands from construction, long-term operation and maintenance. 4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. including all potential direct and indirect project-related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats.	Section 4.3, Biological Resources Section 4.8, Noise Section 4.13.6, Hydrology & Water Quality Chapter 6, Cumulative Impacts
<u>Alternatives Analysis.</u> DEIR should describe and analyze a range of reasonable alternatives to the Project that are potentially feasible; would "feasibly attain most of the basic objectives of the Project;" and would avoid or substantially lessen any of the Project's significant effects. This analysis should also evaluate a "No Project" Alternative.	Chapter 7, Alternatives
Mitigation Measures.	Section 4.3, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. CDFW recommends consideration of the following: 1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows: – Take is for necessary scientific research, – Efforts to recover a fully protected, endangered, or threatened species, – Live capture and relocation of a bird species for the protection of livestock, or – They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).	
Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15)	Section 4.3, Biological Resources
Project activities should generally be designed to completely avoid any fully protected species with the potential to be present within or adjacent to the Project area. The DEIR should analyze impacts to fully protected species resulting from habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. DEIR should include an analysis of how appropriate avoidance, minimization, and mitigation measures will reduce these impacts to fully protected species.	Section 4.3, Biological Resources
2. *Sensitive Plant Communities*, with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive.	Section 4.3, Biological Resources
3. *California Species of Special Concern (CSSC)* should be considered during the environmental review process. CSSCs that have the potential or have been documented to occur within or adjacent to the Project area, include: – **Reptiles**: Colorado Desert fringe-toed lizard, – **Birds**: burrowing owl, fulvous whistling-duck, least bittern, loggerhead shrike, long-eared owl, mountain plover, northern harrier, prairie falcon, redhead, vermilion flycatcher, yellow-breasted chat, yellow-headed blackbird, yellow warbler, – **Mammals**: American badger, big free-tailed bat, California leaf-nosed bat, pallid bat, pocketed free-tailed bat, southern grasshopper mouse, western yellow bat.	Section 4.3, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
Mitigation: • CDFW considers adverse project-related impacts to sensitive species and habitats to be significant, and the DEIR should include mitigation measures for impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation or offsite land acquisition, management, and preservation should be evaluated .	Section 4.3, Biological Resources
• Several irrigation drains and canals traverse or surround the site (Date Drain 3, Date Drain 3A, Dogwood Lateral 2, Date Canal, Dogwood Canal). Potential direct and indirect impacts to the drains/canals and associated fish and wildlife resources, such as burrowing owl, resulting from Project construction are subject to notification under Fish and Game Code Section 1602. • The DEIR should fully identify the potential impacts to lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments.	Section 4.3, Biological Resources
• CDFW recommends incorporation of water-wise concepts in any project landscape design plans. CDFW recommends xeriscaping with locally native California species and installing water-efficient and targeted irrigation systems (such as drip irrigation).	• Chapter 3, Project Description, • Section 4.12, Public Utilities
• CDFW recommends that the DEIR include an analysis of impacts to wildlife from Project-related construction noise, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.	• Section 4.3, Biological Resources • Section 4.8, Noise
• The Project will introduce new sources of artificial lighting. The DEIR should include lighting design specifications for all artificial nighttime lighting used by the Project, an analysis of the direct and indirect impacts of artificial nighttime lighting on biological resources (including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife) and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.	• Chapter 3, Project Description, • Section 4.1, Aesthetics • Section 4.3, Biological Resources
• DEIR should include measures to eliminate all nonessential lighting throughout the Project area; avoid or limit the use of artificial light during the hours of dawn and dusk; ensure lighting for Project activities is fully shielded, cast downward, reduced in intensity, and does not result in spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/); the use of LED lighting with a correlated color temperature of 3,000 Kelvins or less; proper disposal of hazardous waste; and recycling of lighting that contains toxic compounds with a qualified recycler.	• Chapter 3, Project Description, • Section 4.1, Aesthetics • Section 4.3, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• Please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB).	Section 4.3, Biological Resources
• The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination in order for the underlying project approval to be operative, vested, and final.	CDFW filing fees will be paid upon filing of the Notice of Determination. This topic is not discussed further in the EIR.
B. California Dept. of Toxic Substance Control, Tamara Purvis, Associate Environmental Planner, June 18, 2024	
• When agricultural crops and land uses are rezoned for residential use, a number of contaminants of concern can be present. The Lead Agency shall identify the amounts of Pesticides and Organo-chlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are Dichlorodiphenyltrichloroethane (DDT), toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet HHRA NOTE NUMBER 3, DTSC-SLs approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.	Section 4.13.5, Hazards and Hazardous Materials
• Additional chemicals of concern may be found in mixing/loading/storage area, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons (PAHs) and/or Total Petroleum Hydrocarbons (TPHs) may be required.	Section 4.13.5, Hazards and Hazardous Materials
• Due to the zone reclassification change of Agriculture to residential, a site and/or soil assessment should be completed to determine if any Recognized Environmental Conditions (REC's) are present.	As discussed in Chapter 3.0, Project Description, the project does not include a zone re-classification or change of zone. The change of zone occurred when the McCabe Ranch II Specific Plan was approved in 2010.
• This may require a Phase I Environmental Site Assessment and oversight from DTSC or a certified local agency. DTSC should be consulted for boring and analyses recommendations, greater than 50 acres as advised in the DTSC Interim Guidance for Sampling Agricultural Properties.	Section 4.13.5, Hazards and Hazardous Materials
• All imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and USEPA Regional Screen Levels for the intended land use.	Section 4.13.5, Hazards and Hazardous Materials
• To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil	Section 4.13.5, Hazards and Hazardous Materials

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual for the intended land use. • The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.	
C. California Dept. of Conservation, Monique Wilber, Conservation Program Support Supervisor, June 10, 2024	
• The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department advises discussion of the following: – Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the project. – Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc. – Incremental impacts leading to cumulative impacts on agricultural land. • Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies. – Proposed mitigation measures for impacted agricultural lands.	Section 4.13.2, Agricultural and Forestry Resources
Mitigating Agricultural Land Loss or Conversion • The Dept. advises the environmental review address mitigation for the loss or conversion of agricultural land.	Section 4.13.2, Agricultural and Forestry Resources
D. California Dept. of Transportation (Caltrans), District 11, KIMBERLY D. DODSON, GISP, Branch Chief, Local Development Review, June 14, 2024	
Traffic Impact Study • A Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) should be provided for this project.	Section 4.10, Transportation and Traffic
• The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent to any existing or proposed State facilities.	A Local Mobility Analysis has been prepared for the project, the findings of which are summarized in Section 4.10, Transportation. The entire report is included as Appendix G of the Supplemental EIR.
• Sidewalk and ADA curb ramp design shall comply with the requirements as stated in the Design Information Bulletin (DIB) 82-06.	Comment noted.

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• Please submit Sight Distance exhibits for review for all new driveways and new minor street connections inside Caltrans' Right-of-Way (R/W) during the design phase. See Highway Design Manual Topic 201 and Topic 405 for additional information on the requirements of stopping, decision, and corner sight distance.	Site-specific Sight Distance exhibits, hydraulics studies, drainage, and grading plans will be completed as part of the final design for each future development activity.
• All mitigation should be coordinated with Caltrans to identify and implement the appropriate mitigation. All mitigation improvements should be compatible with Caltrans concepts.	Comment noted.
• Roadway mitigation from the development impacts should be fully mitigated by the project prior to completing Phase 1 and especially prior to the construction of the proposed McCabe Elementary School to minimize the traffic impacts for the area.	Section 4.10 Transportation and Traffic. The TM is proposed to be developed in phases and required traffic improvements/mitigation measures have been identified for each phase of development.
• Please provide plans showing all project access points and connections onto SR-86. All roadway connections and driveways shall comply with latest Caltrans Highway Design standards.	A copy of the proposed TM 994 is included in Chapter 3, Project Description and in Appendix I.
• A Local Mobility Analysis must consider the effects on any upstream or downstream intersections and be based on reasonable speed and capacity for the State highway.	A Local Mobility Analysis has been prepared for the project, the findings of which are summarized in Section 4.10, Transportation. The entire report is included as Appendix G.
• The County's Long Range Transportation Plan future road network classifies SR-86 as 6-lane Prime Arterial. R/W acquisition can be accomplished by the Lead Agency through an Irrevocable Offer of Dedication (IOD) from the project owner/developer.	Comment noted.
Design • Please provide detailed mapping showing all project access points onto SR-86. The access point locations shall be consistent with the County's Circulation Element.	A copy of the proposed TM 994 is included in Chapter 3, Project Description and in Appendix I.
• If North Bound SR-86 (from Date Drain 3A to McCabe Road) is to be widened it needs to meet Caltrans ultimate design as a result of direct impacts and should be fully mitigated prior to the commencement of Phase I. Any proposed widening shall meet all applicable Caltrans standards, including 12-foot lane width, 8-foot shoulder width, and 14-foot median width.	Chapter 3.0, Project Description
• Shoulder width should be 8 feet, which may include the curb and gutter (to the flow line). However, a curb and gutter may not be included within lane widths.	Chapter 3.0, Project Description

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• The minimum width of sidewalk should be 6 feet when continuous to a curb or 5 feet when separated by a planting strip. Sidewalk width does not include curbs.	Chapter 3.0, Project Description
• It is recommended to improve North Bound SR-86 intersection with East Bound McCabe to Caltrans ultimate design and should be consistent with the County's Circulation Element.	Section 4.10, Transportation and Traffic
• The preferred design is for signal spacing of 1/2 mile and right turn only access at 1/4 mile spacing. The access for Correll Road needs to be right-in-right-out only and a raised median on SR-86 will be required at Correll Road.	• Chapter 3.0, Project Description • Section 4.10, Transportation and Traffic
<u>Hydrology and Drainage Studies</u> • Please provide hydraulics studies, drainage, and grading plans to Caltrans for review.	Site-specific Sight Distance exhibits, hydraulics studies, drainage, and grading plans will be prepared as part of the final design for each future development activity.
• Will the proposed development retain and/or detain all proposed development generated stormwater on-site for the 100-year storm?	A copy of the proposed TM 994 is included in Chapter 3 of the Supplemental EIR.
• Early coordination with Caltrans Hydraulics Branch is recommended.	Comment noted.
• Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.	Site-specific hydraulics studies, drainage, and grading plans will be submitted to Caltrans as part of the final design for each future development activity.
• The segment of SR-86 adjacent to the project area has been identified as a District 11 Caltrans Active Transportation Plan Tier 1 need for bicycle and pedestrian infrastructure. Accordingly, please work with Caltrans District 11 to explore options for comfortable, convenient, and connected bicycle and pedestrian facilities along this segment of SR-86.	Section 4.10. Transportation
• The proposed Caltrans' bicycle and pedestrian improvements will provide connectivity to the Active Transportation improvements proposed in the County of Imperial's 2019 Active Transportation Plan and the Imperial County Transportation Commission's 2022 Regional Active Transportation Plan and the 2024 Regional Long-Range Transportation Plan.	Section 4.10. Transportation

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• The Imperial Valley Transit routes 1N and 1S currently operate along a portion of SR-86 and Dogwood Road along the eastern boundary of the project area. It is recommended that the Imperial County Transportation Commission be contacted regarding future transit needs along the Dogwood Road.	Comment Noted.
• Caltrans views all transportation improvements as opportunities to improve safety, access and mobility and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation and other enhancements that promotes a complete and integrated transportation network.	Comment Noted.
• To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.	Comment Noted.
• Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.	Section 4.10, Transportation
<u>Land Use and Smart Growth</u> • Development can have a significant impact on traffic on State transportation facilities and affect the number of trips generated and vehicle miles traveled. • Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. • The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.	Comment noted
<u>Noise</u> • The applicant must be informed that in accordance with 23 Code of Federal Regulations 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-86.	Comment noted
<u>Environmental</u> • Caltrans welcomes the opportunity to be a Responsible Agency under CEQA, as we have some discretionary authority of a portion	Caltrans is identified in the Supplemental EIR as a Responsible Agency.

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
of the project that is in Caltrans' R/W through the form of an encroachment permit process.	
• We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.	Comment noted
• An encroachment permit will be required for any work within the Caltrans' R/W prior to construction.	A Caltrans encroachment permit is identified in Chapter 3.0 as a discretionary action.
• The CEQA documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.	Section 4.10, Transportation
• We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W.	Section 4.10, Transportation
<u>Broadband</u> • Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas emissions and other pollutants.	Comment Noted.
<u>Right-of-Way</u> • As a condition of approval, it would be asked that the developer donate the required R/W according to Caltrans standards and prepare a Right-of-Way Map depicting the dedication (see attachments, I0860401 Right-of-Way Map, I0860402 Right-of-Way Map, and Dedication Process per Right-of-Way Manual Chapter 6.20.00).	Comment noted.
• Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.	Comment Noted.
E. Native American Heritage Commission, Murphy Donahue, Cultural Resource Analyst, May 24, 2024	
• Assembly Bill 52 (AB 52) applies to any project for which an NOP, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. • NAHC recommends that lead agencies consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project. • Both Senate Bill (SB 18) and AB 52 have tribal consultation requirements.	• Section 4.11, Tribal Cultural Resources • AB-52 and SB-18 Consultation Letters and Responses (App. H-1 and H-2)

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
F. Imperial County Air Pollution Control District, Ismael Garcia, Environmental Coordinator, June 21, 2024	
• The Air District concurs that revisions of the EIR, as it pertains to Air Quality, are necessary.	Section 4.2, Air Quality
• The programs, Rules and Regulations of the Air District in conjunction with the District's most current CEQA Handbook, and the State Implementation Plans for Ozone, PM2.5 and PM10 work together to ensure that air quality improves or does not degrade. The Air District strongly recommends referencing the Handbook during the generation of the EIR	Section 4.2, Air Quality
• The following is a synopsis of the information pertinent to the development of a Comprehensive Air Quality analysis. – a project description, – assessment of impacts and health consequences of emissions conducted using the Districts approved modeling factors; – short- and long-term emissions along with daily and yearly emission calculations; – A description of the Air District's attainment status, State and Federal, and any regulatory restrictions to the project. – Mitigation measures should be identified, quantified for effectiveness, and incorporated into the environmental document. – All mitigation measures must follow District Rules and Regulations including the most current Handbook. – A cumulative impact analysis. – Project alternatives should be included along with a thorough emissions analysis per alternative.	• Section 4.2, Air Quality • Section 6.0, Cumulative
• In accordance with the Global Warming Solutions Act of 2006 (Assembly Bill 32) and the most recent amendments to the CEQA Guidelines, a discussion of the impacts from Green House Gas (GHG) emissions and its relation to climate change is required	Section 4.5, Greenhouse Gas Emissions
• The Air District also recommends using the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Heath and Equity (GHG Handbook) which was developed by the California Air Pollution Control Officer's Association (CAPCOA) to assist in creating an adequate GHG analysis.	Section 4.5, Greenhouse Gas Emissions
G. Imperial County Fire Department, Andrew Looper, Lieutenant/Fire Prevention Specialist, May 24, 2024	
• Potential Public Services Impact	• Section 4.9, Public Services

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
• Requested copy of Mitigation Measures MM 4.12.1a, 4.12.b, and 4.12.c from Previous 2010 Final EIR.	• A copy of requested mitigation measures were provided.
H Imperial Irrigation District, June 24, 2024	
1. For temporary construction or permanent electrical service at the distribution level, the applicant should contact Ignacio Romo, IID Customer Project Development Planner Senior, at (760) 482-3426 or e-mail Mr. Romo at IGRomo@IID.com. to initiate the customer service application process.	Comment noted.
2. Distribution-rated electrical service is limited in the area. A circuit study may be required. Any improvements or mitigation identified in the circuit study to enable the provision of electrical service shall be the financial responsibility of the applicant.	Section 4.12, Utilities and Service Systems
3. Applicant shall provide a surveyed legal description and associated exhibit certified by a licensed surveyor for all rights-of-way (ROWs) to accommodate the project's electrical infrastructure. ROWs and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.	Section 4.12, Utilities and Service Systems
4. IID water facilities that may be impacted include the Dogwood Canal, Dogwood Lateral 2, Date Drain No. 3, and Date Drain No. 3A. The applicant may not use IID's canal or drain banks to access the project site. Any abandonment of easements or facilities shall be approved by IID based on system needs.	Section 4.12, Utilities and Service Systems
5. The proposed TM indicates that the Date Drain No. 3 and the Dogwood Lateral 2 are to be placed underground/pipelined from McCabe Road to Correll Road. IID's existing "PW" 92kV transmission line with a distribution (T-321 Circuit) 7.2/12.5kV underbuilt would remain in between the proposed undergrounding/pipelining. Horizontal, vertical distances and finish grades during and after the pipelining process are of concern as well as the need for access during the pipelining process and after its completion to operate and maintain both water and electrical facilities will be needed.	• Chapter 3, Project Description • Section 4.12, Utilities and Service Systems
6. To ensure there are no impacts to IID water facilities, applicant should submit grading, drainage and fencing plans to IID Water Department Engineering Services for review and comment prior to final project design and Tract Map approval.	• Section 4.12, Utilities and Service Systems
7. Fences should be installed at the boundary of IID's right of way (ROW) for safety and to allow access for IID operation and maintenance activities. The project's fencing plan should address IID's ROW.	• Chapter 3.0, Project Description • Section 4.12, Utilities and Service Systems

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
8. The applicant will be required to provide ROWs and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.	Section 4.12, Utilities and Service Systems
9. The applicant will be required to provide and bear all costs associated with acquisition of ROWs, easements, and infrastructure relocations deemed necessary to accommodate street or road improvements imposed by the municipality.	Comment Noted.
10. Public utility easements over all private and public roads and an additional 10 feet in width on both sides of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.	• Chapter 3.0, Project Description; • Section 4.12, Utilities and Service Systems
11. Any construction or operation on IID property or within its existing and proposed ROWs or easements including but not limited to surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement.	• Chapter 3.0, Project Description; • Section 4.12, Utilities and Service Systems
12. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive ROW to the toe of slope of all existing canals and drains. IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.	Section 4.12, Utilities and Service Systems
13. Should the development want site access from La Brucherie Road, an IID crossing and encroachment permit will be required. When new crossings or modification to the existing crossings are needed, the applicant will be responsible for the cost of these improvements and IID will design and construct them.	The proposed project does not include access from La Brucherie Road. This issue will not be addressed further addressed in the SEIR.
14. Any new, relocated, modified or reconstructed IID facilities required for and by the project including electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.	• Chapter 3.0, Project Description; • Section 4.3, Biological Resources • Section 4.12, Utilities and Service Systems
15. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA.	Comment noted.

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed In The SEIR
16. When the project goes through the CEQA compliance process, a circuit study/distribution impact study, facility study, and/or system impact study must be performed to evaluate the project's impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" Section of the Environmental Checklist/Initial Study, should be evaluated to determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects.	Section 4.9, Public Utilities
INDIVIDUAL'S COMMENTS	
I. Beau Ashly, June 18, 2024	
Preservation of Raw Water Access • My Mother-in-law resides at 1358 Appaloosa Rd and currently receives raw water service, via the IID, from the Dogwood canal and the ditch running perpendicular to the Dogwood canal. This ditch runs right behind the properties at 1356 and 1354 Appaloosa Rd. I would like to state that much care and consideration should be taken to preserve this access to raw water service from the Dogwood Canal so my mother-in-law has access to water.	Section 4.12, Utilities and Service Systems
McCabe Road Access • I reside at 1354 Appaloosa Rd. I noticed there could be a possibility to have road/street access on or near the Southwestern point of my property. I would like to submit information, for the record, to get some more clarity on what this would look like.	Section 4.10, Transportation/Traffic

2.4.2. Public Scoping Meeting

One public scoping meeting was held by the County of Imperial to solicit input from governmental agencies, non-governmental organizations, and the public regarding the proposed Project, alternatives, mitigation measures, and environmental impacts to be analyzed in the EIR. The meeting was held on Thursday, June 13, 2024, at 6:00 p.m. in the County Administrative Center, Board Chambers, El Centro, California. Four (4) members of the public attended the scoping meeting and one oral comment was received. Copies of the Scoping Meeting Materials and comment are presented in Appendix A-2.

2.4.3. Public Notice/Review of Draft Supplemental EIR Review

The Draft Supplemental EIR (Draft SEIR) will be circulated to the California State Clearinghouse, responsible and trustee agencies, and interested parties for a 50-day public review period (45-day

minimum per CEQA, plus five days per County of Imperial CEQA Guidelines). The Draft SEIR will also be made available for review online at the ICPDSD website: http://www.icpds.com.

Hard copies will also be available at the at the County of Imperial Planning and Development Services Department, 801 Main Street, El Centro, California 92243.

All public comments on the Draft SEIR should be directed to David Black davidblack@co.imperial.ca.us, Imperial County Planning and Development Services Department, 801 Main Street, El Centro, California 92243.

The public review and comment period started on October 30, 2025. Comments received during the public review period of the Draft SEIR will be reviewed and responded to in the Final SEIR. The Final SEIR will be reviewed by the Imperial County Planning Commission and Board of Supervisors as a part of the procedures to certify the SEIR.

2.4.4. Certification of Final EIR/Project Consideration

The County of Imperial Planning Commission (Commission) will consider the Final SEIR and make its recommendation to the Board of Supervisors (Board) regarding the Project. If, in the exercise of its independent judgment and review, the finds that the Final SEIR is "adequate and complete," the Board may certify the Final EIR at a public hearing. The "rule of adequacy" generally holds that the Final EIR can be certified if it shows a good faith effort at full disclosure of environmental information and provides sufficient analysis to allow decisions to be made regarding the Project in contemplation of its environmental consequences.

Upon review and consideration of the Final SEIR, the Board may take action to approve, revise, or reject the Project. A decision to approve the Project would be accompanied by written findings in accordance with CEQA Guidelines, Section 15091, and, if applicable, Section 15093. A Updated Mitigation Monitoring and Reporting Plan (MMRP), as described below, would also be adopted for mitigation measures that have been incorporated into or imposed upon the Project to reduce or avoid significant impacts to the environment. The MMRP would be designed to ensure that these measures are carried out during project implementation.

2.4.5. Mitigation Monitoring and Reporting Program

Section 21086.1 of CEQA requires that public agencies adopt a program for monitoring mitigation measures or conditions of project approval that reduce or eliminate significant impacts to the environment. As such, the County will prepare an MMRP for the Project. The MMRP will be submitted to approving agencies along with the Final EIR prior to considering the Project for approval. Any mitigation measures adopted by the Planning Commission (or Board of Supervisors) as conditions for approval of the Project will be included in the MMRP to track and verify compliance.

2.5. Agency Roles and Responsibilities

The Project would require permits and approvals from various federal, state and local regulatory agencies. The agencies are identified below.

2.5.1. Lead Agency

The County of Imperial (County) is the lead agency for the environmental review of the McCabe Ranch II TM 994. The County will be required to consider the McCabe Ranch II Tract Map 994 as well as an amendment to the amendment to the McCabe Ranch II Specific Plan Area. The tract map would allow for the subdivision of the area. An amendment to the McCabe Ranch II Specific Plan would be needed to incorporate the development phasing for the McCabe Ranch II Tract Map 994. The County will also be responsible for certification of the Supplemental EIR.

2.5.2. Responsible and Trustee Agencies

Projects or actions undertaken by the lead agency, in this case the Imperial County Planning and Development Services Department, may require subsequent oversight, approvals, or permits from other public agencies in order to be implemented. Other such agencies are referred to as responsible agencies and trustee agencies. Pursuant to §15381 and §15386 of the CEQA Guidelines, as amended, responsible agencies and trustee agencies are defined as follows:

- A responsible agency is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term responsible agency includes all public agencies other than the lead agency that have discretionary approval power over the project (§15381).
- A trustee agency is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California (§15386).

The Project may require permits or approvals from various agencies for the facility and activities that constitute the project including but are not limited to the following:

State

- California Dept. of Fish & Wildlife (CDFW)
- California Dept. of Public Health
- California Regional Water Quality Control Board, Region 7
- State Water Resources Control Board

Regional and Local

- Imperial County Public Health

- Imperial County Air Pollution Control District (ICAPCD)
- Imperial County Environmental Health Services Division (Local Enforcement Agency (LEA) for CalRecycle)
- Imperial County Public Works Department

The approvals anticipated to be required from the lead agency, trustee agencies, and/or responsible agencies are listed in Chapter 3.0 Project Description.

2.6. Intended Uses of this Supplemental EIR

The County is the Lead Agency for this project under CEQA. CEQA and the CEQA Guidelines establish the County as the Lead Agency, which is defined in CEQA Guidelines Section 15367 as "the public agency which has the principal responsibility for carrying out or approving a project." The Lead Agency decides whether an EIR or Negative Declaration (ND) is required for the project and is responsible for preparing the appropriate environmental review document.

This SEIR has been prepared for the County in accordance with CEQA and the CEQA Guidelines. This SEIR will be used by the County, responsible agencies, and the public for the purpose of evaluating the environmental effects associated with proposed Project.

2.7. Supplemental EIR Content and Organization

This Draft SEIR includes all applicable information required by Article 9 of the CEQA Guidelines (Sections 15120-15130). **Table 2-2** contains a list of sections required under CEQA, along with a reference to the chapter in which they can be found in this document.

TABLE 2-2: REQUIRED EIR CONTENTS

Requirement (CEQA Section)	Location in EIR
Table of Contents (Section 15122)	Table of Contents
Summary (Section 15123)	Chapter 1
Project Description (Section 15124)	Chapter 3
Environmental Setting (Section 15125)	Chapter 4
Significant Environmental Effects of Proposed Project (Section 15126.2(a))	Chapter 1; Chapter 4
Unavoidable Significant Environmental Impacts (Section 15126.2(b))	Chapter 1; Chapter 5
Significant Irreversible Environmental Changes (Section 15126.2(c))	Chapter 1; Chapter 5
Growth Inducing Impacts (Section 15126.2(d))	Chapter 1; Chapter 5

TABLE 2-2: REQUIRED EIR CONTENTS

Requirement (CEQA Section)	Location in EIR
Mitigation Measures (Section 15126(e) and Section 15126.4)	Chapter 1; Chapter 4
Cumulative Impacts (Section 15130)	Chapter 1; Chapter 6
Alternatives to Project (Section 15126.6(f))	Chapter 7
Effects Found not to be Significant (Section 15128)	Chapter 5
Organizations and Persons Contacted/List of Preparers (Section 15129)	Chapter 8

The content and organization of this SEIR are in accordance with the most recent guidelines and amendments to CEQA and the State CEQA Guidelines. Technical studies have been summarized within individual environmental analysis sections and/or summary sections. Full technical studies have been included in the appendices to this EIR (see Volume II of the SEIR) and are available for review during the public comment period.

This EIR has been organized in the following manner:

- **Chapter 1.0, Executive Summary** is provided at the beginning of the SEIR which outlines the conclusions of the environmental analysis, and a summary of the proposed Project as compared to the alternatives analyzed in this SEIR. The Executive Summary also includes a table summarizing all identified environmental impacts, along with the associated mitigation measures proposed to reduce or avoid each impact.
- **Chapter 2.0, Introduction and Background,** provides an overview of the SEIR, introducing the proposed Project and its background, applicable environmental review procedures, and format of the EIR.
- **Chapter 3.0, Project Description,** provides a description of the proposed Project, including its objectives, location (regional and local), general environmental setting, identification of discretionary actions and interested parties, and a list of cumulative projects. The setting discussion also addresses the relevant planning documents and existing land use designations of the Project site.
- **Chapter 4.0, Supplemental Analysis to the McCabe Ranch II Specific Plan EIR,** provides a detailed impact analysis for each environmental issue that would result with Project implementation, comparing the Project's impacts with the impacts identified in the Certified EIR. This section also identifies feasible mitigation measures, either those identified in the Certified EIR or identified as part of the supplemental analysis, as applicable. The scope of this SEIR is limited to environmental issues raised by the differences between the currently proposed Subdivision Tract Map 994 and McCabe Ranch II Specific Plan Amendment and the

approved 2010 McCabe Ranch II Specific Plan described and evaluated in the 2010 Specific Plan EIR. The analysis also evaluates additional impacts that could result from implementation of the mitigation measures, if any.

- **Chapter 5.0, Analysis of Long-Term Effects,** addresses significant unavoidable impacts of the proposed Project, including those that can be mitigated but not reduced to below a level of significance; significant irreversible environmental changes that would result from the proposed Project, including the use of nonrenewable resources; growth inducement and environmental resources that would not be affected by the proposed Project.
- **Chapter 6.0, Cumulative Impact Analysis,** addresses the potential cumulative impacts associated with the proposed Project and other existing, approved, and proposed development in the area.
- **Chapter 7.0, Alternatives,** provides a description and evaluation of alternatives to the proposed Project. This section addresses the mandatory "No Project" alternative, as well as development alternatives that would reduce or avoid the proposed Project's significant impacts.
- **Chapter 8.0, Preparers,** identifies persons involved in the preparation of this EIR and/or those contacted during preparation of this EIR who provided information or data incorporated into the document.
- **Chapter 9.0, References,** provides a list of informational sources and technical reports utilized in preparation of the EIR.
- **Appendices** provide information and/or relevant technical studies in support of the environmental analysis contained in this SEIR.

Environmental issues evaluated in Chapter 4.0 of this EIR include:

- Air Quality
- Biological Resources
- Energy
- Environmental Justice
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Traffic and Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Project Consistency with Certified EIR

2.8. Incorporation By Reference

This Draft SEIR uses information from various documents that were not prepared specifically for the Project, but that provide relevant information in describing environmental conditions and analyzing the potential environmental effects of the proposed Project. As allowed by Section 15150 of the State CEQA Guidelines, all or portions of another document may be incorporated by reference into an EIR without the requirement of reproducing the entire source document in the EIR. Information taken from these documents would be identified in the relevant environmental impact analysis sections of the EIR. This EIR relies upon previously adopted regional and statewide plans and programs, agency standards, and background studies in its analysis, such as the County of Imperial General Plan, Title 9 Land Use Ordinance; Noise Abatement and Control Ordinance, Imperial County Air Pollution Control District's 2017 CEQA Air Quality Handbook. Whenever existing environmental documentation or previously prepared documents and studies are used in the preparation of the Draft EIR, the information is summarized for the convenience of the reader and incorporated by reference. In addition, each section which relies upon previously adopted plans, programs, environmental documentation and background studies contains a brief summary of how it specifically relates to the proposed Project and that the information has been reconfirmed. In accordance with the CEQA Guidelines, Section 15150(b), the documents referenced in the EIR will be made available to the public for inspection at the County upon request.

In addition, referenced documents and other sources used in preparation of the Draft SEIR are identified in Chapter 9.0 (References), in addition to the *McCabe Ranch III Specific Plan*, June 2010. Also incorporated by reference is the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037). As required by Section 15150(b) of the CEQA Guidelines, the documents that are incorporated by reference are available for public inspection at Imperial County Planning and Development Services Department, 801 Main Street, El Centro, California 92243. For purposes of clarification, documents identified as incorporated by reference are separate from the technical studies included in the Appendix to the Draft SEIR and prepared specifically for the Project.

Information from the documents that have been incorporated by reference pursuant to Section 15150 of the State CEQA Guidelines have been briefly summarized in the appropriate sections of this report. Documents incorporated by reference include, but are not limited to:

- PMC, *McCabe Ranch II Specific Plan, Final Environmental Impact Report*, SCH No. 20087111037, June 2010.
- Ninyo & Moore, *McCabe Ranch II Specific Plan Draft Hazardous Materials Technical Study*, September 2008.
- Ninyo & Moore, *McCabe Ranch II Specific Plan Geology and Soils Evaluation*, September 2008.

- PMC, *McCabe Ranch II Specific Plan Air Quality Report*, April 2009.
- PMC, *McCabe Ranch II Specific Plan Cultural Resource Record Search*, May 2009.
- PMC, *McCabe Ranch II Specific Plan SB 610 Water Supply Assessment*, April 2010.
- PMC, *McCabe Ranch II Specific Plan Special Status Plants and Wildlife Potentially Occurring within the Study Area*, May 2009.
- PMC, *McCabe Ranch II Traffic Impact Analysis*, Updated April 2010.
- Urban Crossroads, *McCabe Ranch II Specific Plan Noise Analysis*, May 2009. Errata Published June 2010.

Technical studies and reports prepared for the proposed Project are included in the Appendices of, and are considered a part of, the Draft SEIR.

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3.0 PROJECT DESCRIPTION

3.1. Project Background

The McCabe Ranch II Specific Plan (SP07-004), which established a framework for the development of a variety of land uses within the approximately 468-acre Specific Plan Area (SPA), was approved by the Imperial County Board of Supervisors (Board) in December 2010. Additionally, the Board approved a related Subdivision Tentative Map (TR 00979), which has subsequently expired. As part of the Specific Plan approval, the Board also certified the Final Environmental Impact Report (Certified EIR), Mitigation and Monitoring Program (MMRP) and CEQA Findings. The previously certified 2010 Final EIR (Certified FEIR) analyzed the direct, indirect and cumulative changes to the physical environment that would result from development of a maximum of 2,300 single- and multiple-family dwelling units; 19.2-acres of parks; an 8.4-acre business park; 3.2 acres of commercial uses; two (2) elementary school sites for the McCabe Unified and Heber Unified School Districts (28.5 acres combined) and associated public improvements within the McCabe Ranch II SPA [(1)].

3.2. Project Objectives

The McCabe Ranch II Specific Plan is designed to be a well-rounded community, providing a variety of housing types, schools, community facilities, and parks, along with both "village" commercial and medium commercial areas. The residential component would be broken into two segments: a gated community along the northern portion and an open community in the southern portion. A major goal of the project is to provide housing opportunities for varying incomes and stages of life.

The following objectives were identified in the Certified EIR for the McCabe Ranch II Specific Plan:

Objective 1: Develop a highly walkable community plan that integrates a variety of residential uses, including conventional and gated communities, commercial areas, parks, schools, and other facilities essential to the daily lives of the residents.

Objective 2: Provide a variety of housing opportunities, ranging in size and affordability, to meet the housing needs of the region.

Objective 3: Incorporate the village commercial area to provide adequate service and shopping opportunities for both local residents and visitors.

Objective 4: Provide the business/office area to support job creation within the Plan.

[1] Source: McCabe Ranch II Specific Plan Final Environmental Impact Report, Table 3.0-1, Proposed Land Uses. County of Imperial, 2010.

Objective 5: Incorporate design features that support a unique living environment with a strong sense of community and social interaction.

Objective 6: Use a series of parkland areas connected by a trails system to link compatible land uses that are within easy walking distance of each other.

Objective 7: Promote an active lifestyle by providing a variety of recreation amenities such as recreational sports facilities, passive parks, walking trails, bike routes, parks, and open spaces.

Objective 8: Provide a park or open space within a five-minute walking distance of most residences in the Plan area.

Objective 9: Enhance the community's well-used sports facilities and reputation as a youth sports community by incorporating a variety of sports fields within many of the Plan's park areas.

Objective 10: Design a safe and efficient circulation system that adequately supports the anticipated level of traffic in and around the Plan area.

Objective 11: Provide public services that meet the needs of development in the Plan area, including a potential sheriff storefront in the village.

Objective 12: Develop a financing and phasing plan that provides for the efficient and timely provision of infrastructure and public services as development occurs.

Objective 13: Assist in the planning, design, construction and financing of school facilities to serve the specific plan area concurrent with the phasing of development of the residential uses.

The following project objectives specific to this proposed McCabe Ranch II TM 994 and Specific Plan Amendment (Project) include:

Objective 14: Develop within an urban land use designation that does not require an Amendment to the General Plan Land Use Element to avoid further reduction of agriculturally zoned lands.

Objective 15: Maximize the number of residential units to be developed within each of the designated residential parcels to assist the County and state in addressing the housing crisis in California, while maintaining the overall residential cap of 2,300 DUs identified in the adopted McCabe Ranch II Specific Plan.

Objective 16: Minimize the number of mini-estate and-estate lots (10,000 SF and larger) while maximizing the number of flex and small lots to provide more attainable housing opportunities.

Objective 17: Increase the maximum allowed number of multi-family units from that provided in the adopted McCabe Ranch II Specific Plan to further provide more attainable housing opportunities.

Objective 18: Maintain the allowable densities and intensities of development identified in the adopted McCabe Ranch II Specific Plan as allocated to those parcels under separate ownerships from the applicant's parcels.

Objective 19: Obtain public services from a willing public entity whose sphere of influence currently includes the subject development for efficiency.

Objective 20: To the extent feasible, cooperate with the separate ownerships within the McCabe Ranch II Specific Plan Area in the phasing and cost sharing of the necessary public infrastructure.

3.3. Project Description

3.3.1. Project Site

McCabe Ranch II Tract Map 994 Project site is an approximately 351.2-acre portion of the 468-acre McCabe Ranch II Specific Plan Area generally located north of the Community of Heber and south of the City of El Centro, in the County of Imperial, California (see **Figure3- 1, Regional Location and Figure 3-2, Project Location**). The McCabe Ranch II Tract Map 994 Project site is bounded by McCabe Road on the north, Dogwood Road on the east, State Route 86 (SR-86) on the west, and the western extension of Correll Road on the south. The McCabe Ranch II Tract Map 994 Project site is located in Section 20, Range 14 East, Township 16 South within the U.S. Geological Survey (USGS) Heber, California 7.5-minute topographic.

3.3.2. Proposed Tentative Tract Map 994

McCabe Ranch Realty, LLC (Applicant) is seeking to process a Subdivision Tentative Map, referred to as the McCabe Ranch II Tract Map 994, for an approximately 351.2-acre portion of the McCabe Ranch II Specific Plan Area to accommodate the phased development of 1,610 residential units (single- and multiple-family units), a 13-acre elementary school site for the McCabe Union School District, parks, roadways, associated utilities, drainage and storm water treatment improvements. The proposed McCabe Ranch II Tract Map 994 is shown on **Figures 3-3A through Figure 3-3F**. The McCabe Ranch II Tract Map 994 (Project or proposed Project) is comprised of four (4) parcels; County of Imperial Assessor Parcel Numbers (APNs) 054-130-072, 054-130-076, 054-130-077, and 054-130-078. The Imperial Irrigation District’s Date Drain No. 3 and Dogwood Canal both traverse the Project area in a north-south direction.

3.3.3. Proposed Development Phases

Development of the proposed McCabe Ranch II Tract Map 994 is proposed to occur in phases (Phase 1A, 1B, 2A, 2B, 3A, 3B, 3C) over a 14-year period between 2025 and 2039 as shown on **Figure 3-4, Proposed Phasing Plan**. A detailed breakdown of development by phase for the proposed Mcabe Ranch II Tract Map 994 is presented on **Table 3-1.** Development within that

portion of the McCabe Ranch II Specific Plan area outside of Tract Map 994, may develop prior to, concurrently with, or subsequent to the Tract Map 994 and is denoted as Phase 4. **Table 3-2** provides a summary of proposed land uses within the entirety of the Specific Plan Area and **Table 3-3** provides a comparison of land uses approved under the Adopted McCabe Ranch II Specific Plan vs. the Proposed McCabe Ranch II TM 994 and SPA.

The development phasing for of the McCabe Ranch II Tract Map 994, and for the Phase 4 area differs from that identified in the adopted McCabe Ranch II Specific Plan. For this reason, an amendment to the McCabe Ranch II Specific Plan is also proposed. Land uses included in the McCabe Ranch II Specific Plan are shown on **Figure 3-5**.

Sewer, water, park maintenance, and landscape and lighting maintenance services would be provided by the Heber Public Utility District (HPUD). However, in order for services to be provided, the Specific Plan Area must be annexed into the HPUD.

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TABLE 3-1. DETAILED DEVELOPMENT BY PHASE, MCCABE RANCH II TRACT MAP 994 AND SPECIFIC PLAN AMENDMENT

PROPOSED LAND USES		PHASE 1 (a)		PHASE 2 (a)		PHASE 3 (a)			PROJECT SUBTOTAL (Phases 1-3/ TM 994)	PHASE 4 (Remainder of SPA)	SPA TOTAL
		1A	1B	2A	2B	3A	3B	3C			
Development Year		**2025 - 2026**	**2026 -2027**	**2029 - 2031**	**2032 - 2033**	**2034 - 2035**	**2036 - 2037**	**2038 - 2039**	**2025 - 2039**	**Concurrent or Subsequent to TM 994)**	
RESIDENTIAL DEVELOPMENT (DUs)									**DUs**	**DUs**	**DUs**
Single-Family	**Density**										
Traditional Single Family	5 DU/AC	0	0	160	134	151	0	88	**533**	36	569
Small Lot Single-Family	7 DU/AC	0	157	100	0	0	0	0	**257**	149	406
Flex Lot Single-Family	9 DU/AC	157	0	0	0	0	88	0	**245**	237	482
Mini Estate	3 DU/AC	0	0	0	0	0	0	19	**19**	0	19
Estate Lot	2 DU/AC	0	0	0	25	0	0	0	**25**	0	25
Single-Family Subtotal		**157**	**157**	**260**	**159**	**151**	**88**	**107**	**1,079**	**422**	**1,501**
Multi-Family	**Density**										
Multi-Family 1 (NW Corner)	20 DU/AC	0	0	0	196	0	0	0	196	0	196
Multi-Family 2 (NE Corner)	19 DU/AC	0	0	0	0	0	335	0	335	0	335
Multi-Family 3	25 DU/AC	0	0	0	0	0	0	0	0	268	268
Multi-Family Subtotal		**0**	**0**	**0**	**196**	**0**	**335**	**0**	**531**	**268**	**799**
TOTAL RESIDENTIAL		***157***	***157***	***260***	***355***	***151***	***423***	***107***	***1,610***	***690***	***2,300***
NON - RESIDENTIAL DEVELOPMENT (Acres)									**Acres**	**Acres**	**Acres**
Elementary (K-5) School Site (a) (b)		0	0	12.3	0	0	0	0	**12.3**	16.29	28.59
Commercial		0	0	0	0	0	0	3.14	**3.14**	0	3.14
Business Park		0	0	0	0	0	0	0	**0**	9.41	9.41
Park/Detention/Greenbelt (inc. IID Easement)		0	0	0	0	0	0	0	**35.53**	24.58	60.11
Major Collector Roads		(c)	(c)	(c)	(c)	(c)	(c)	(c)	**48.3**	5.32	53.62
IID Substation		(d)	(d)	(d)	(d)	(d)	(d)	(d)	**2.27**	0	2.27

Notes:

(a) Denotes property controlled by McCabe Ranch Realty, LLC. Included in TM 994.

(b) Proposed McCabe Elem. School Site located in Phase 2A; Proposed Heber Elem. School Site located in Phase 4

Source: McCabe Ranch Realty, April 2024.

(c) Acreage of major collector roads presented only for Phase 1-3 and for Phase 4

(d) 2.25-acre substation located in Phase 2B.
DU = Dwelling Units. Acres = 0 Means no development during this phase
SPA = McCabe Ranch II Specific Plan Area

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TABLE 3-2. SUMMARY OF LAND USES - MCCABE RANCH II SPECIFIC PLAN AREA[(1)]

Land Use	Approx. Gross Acres	% of Total Specific Plan Area	Dwelling Units
Residential Uses			
Traditional Lot – Single Family (5,000 SF+)	121.46	25.9	569
Small Lot – Single Family (4,000 SF – 5,000 SF)	58.02	12.4	406
Flex Lot – Single Family (2,000 SF – 4,000 SF)	65.54	14.0	482
Mini-Estate Lot – Single Family (9,000 SF+)	6.72	1.5	19
Estate Lot – Single Family (20,000 SF+)	19.85	4.2	25
Single Family Subtotal	**271.59**	**58.0**	**1,501**
Multi-Family 1 (Northwest Corner)	9.82	2.0	196
Multi-Family 2 (Northeast Corner)	17.57	3.8	335
Multi-Family 3	12.2	2.6	268
Multi-Family Subtotal	39.59	8.4	799
Residential Uses Subtotal	***311.18***	***66.4***	***2,300***
Non-Residential Uses			
Business Park	9.41	2.0	-0-
Commercial	3.14	0.7	-0-
Elementary School Site (McCabe)	12.3	2.6	-0-
Elementary School Site (Heber)	16.29	3.5	-0-
Non-Residential Uses Subtotal	***41.14***	***8.8***	***-0-***
Open Spaces/Recreation/Roads/Electrical Substation			
Open Space/Recreation Subtotal (b)	60.11	12.8	-0-
Major Collector Roads Subtotal	53.62	11.5	-0-
IID Electrica Substation	2.27	0.5%	-0-
GRAND TOTAL	468.32	100	2,300

Notes: (a) Includes properties controlled by McCabe Ranch Realty, LLC. (McCabe Ranch II TM 994) as well as property under separate ownership (not controlled by McCabe Ranch Realty LLC).

(b) Includes Parks / 9.41Detention / Greenbelts (incl IID easement)

Source: McCabe Realty, LLC, 2025.

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TABLE 3.3. LAND USE SUMMARY COMPARISON – ADOPTED MCCABE RANCH II SPECIFIC PLAN VS. PROPOSED MCCABE RANCH II TM 994 AND SPA

Land Use Summary - Adopted McCabe Ranch II Specific Plan [1]				Land Use Summary – Proposed McCabe Ranch II TM 994 and Specific Plan Amendment [2]				Net Change (TM 994 & SPA vs Adopted SP)	
Land Use	**Gross Acres**	**Percent of Total Area**	**Dwelling Units (DUs)**	**Land Use**	**Gross Acres**	**Percent of Total Area**	**Dwelling Units (DUs)**	**Gross Acres**	**Dwelling Units (DUs)**
RESIDENTIAL				**RESIDENTIAL**					
Conventional Residential (Type and Lot Size)				**Conventional Residential (Type and Lot Size)**					
Traditional Lot – Single Family (6,000 SF)	83.9	18.4%	420	Traditional Lot – Single Family (~~6,000~~ 5,000 SF)	121.46	25.9%	569	37.56	149
Small Lot – Single Family (4,000 SF)	31.6	6.9%	221	Small Lot – Single Family (4,000 to 5,000 SF)	58.02	12.4%	406	26.42	185
Flex Lot – Single Family (2,000 to 3,200 SF)	68.6	15.0%	617	Flex Lot – Single Family (2,000 to ~~3,200~~ 4,000 SF)	65.54	14.0%	482	-3.06	-135
High Density Multi-Family (22 Units/Acre)	26.7	5.8%	587	High Density Multi-Family (~~22~~ 25 Units/Acre) (a)	39.59	8.5%	799	12.89	212
Conventional Residential Subtotal	**210.8**	**45.50%**	**1,845**	**Conventional Residential Subtotal**	**284.6**	**60.8%**	**2,256**	**73.81**	**411**
Gated Community Residential (Type and Lot Size)				**Gated Community Residential (Type and Lot Size)**					
Estate Lots – Single Family (0.5-ac)	22.6	4.9%	45	Estate Lots – Single Family (~~0.5 ac~~ 20,000 SF)	19.85	4.2%	25	**-2.75**	**-20**
Mini Estate Lots – Single Family (10,000 SF)	25.9	5.7%	112	Mini Estate Lots – Single Family (~~10,000~~ 9,000 SF)	6.72	1.4%	19	**-19.18**	**-93**
Low Density Single-Family (6,000 SF)	33.4	7.3%	167	Low Density Single-Family (6,000 SF)	0	0.0%	0	**-33.4**	**-167**
High Density Multi-Family (22 Units/Acre)	8.6	1.9%	131	High Density Multi-Family (~~22~~ 25 Units/Acre)	0	0.0%	0	**-8.6**	**-131**
Gated Community Residential Subtotal	**82.8**	**18.1%**	**455**	**Gated Community Residential Subtotal**	**26.57**	**5.7%**	**44**	**-56.23**	**-411**
RESIDENTIAL TOTAL	**293.6**	**64.2%**	**2,300**	**RESIDENTIAL TOTAL**	**311.18**	**66.5%**	**2,300**	**17.58**	**0**
NON-RESIDENTIAL				**NON-RESIDENTIAL**					
Business Park	8.4	1.8%	0	Business Park	9.41	2.0%	0	1.01	0
Commercial	3.2	0.7%	0	Commercial	3.14	0.7%	0	-0.06	0
Elementary School (McCabe)	13.3	2.9%	0	Elementary School (McCabe)	12.3	2.6%	0	-1	0
Elementary School (Heber)	15.2	3.3%	0	Elementary School (Heber)	16.29	3.5%	0	1.09	0
Non-Residential Subtotal	**40.1**	**8.8%**	0	**Non-Residential Subtotal**	**41.14**	**8.8%**	**0**	**1.0**	0
Open Space/Recreation				**Open Space/Recreation**					
Parks (open)	36	7.9%	0				--		--
Parks (gated)	15.6	3.4%	0				--		--
Open Space/Recreation Subtotal	51.6	11.3%	0	**Open Space/Recreation Subtotal (b)**	60.11	12.8%	0	8.51	0
Roads	70.3	15.4%	0	Roads	53.62	11.5%	0	-16.68	0
				IID Electrica Substation	2.27	0.5%	0	2.27	0
NON-RESIDENTIAL TOTAL	**162**	**35.4%**	**0**	**NON-RESIDENTIAL TOTAL**	157.14	33.6%	0	-6.09	0
TOTAL	**457.0**	**100%**	**2,300**	**TOTAL**	**468.3**	**100%**	**2,300**	**11.49**	**0**

Sources: (1) McCabe Ranch II Specific Plan,. Table 2-1 Land Use Summary (Imperial County, June 2010). (2) McCabe Ranch II Specific Plan, Amendment No. 1 (Imperial County, June 2025).

Notes: (a) includes Proposed TM 994 multiple family development areas MF 1 (Northwest Corner); MF 2 (Northeast Corner); and MF 3. (b) includes parks, detention basins, greenbelt and IID Easement(s)

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3.4. Required Agency Actions and Required Permits

Various permitting requirements would need to be met prior to implementation of the proposed project. **Table 3-4** summarizes federal, state, and local approvals and/or permits that may be required for the project and the agencies that are expected to use the EIR in their decision-making and permitting processes.

TABLE 3-4. POTENTIAL CONSULTATION AND PERMITTING REQUIREMENTS

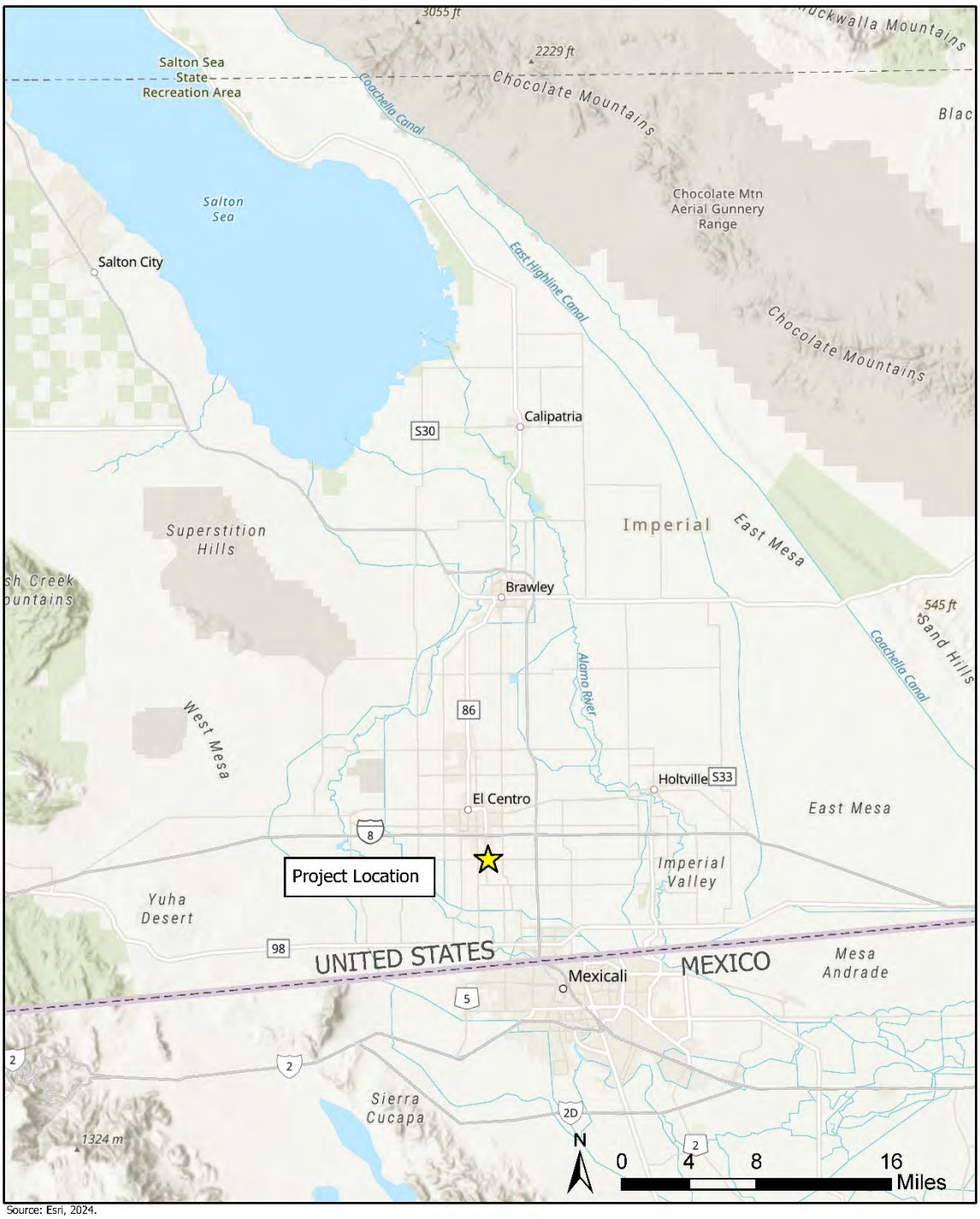
Jurisdiction Level	Type of Permit/Approval	Agency	Purpose
Federal	Section 404 of the Federal Clean Water Act Permit	U.S. Army Corps of Engineers (USACE)	Regulates discharge of dredged and/or fill material into Waters of the United States.
Federal	Endangered Species Act (ESA) Section 7 Consultation	U.S. Fish and Wildlife Service (USFWS)	Required for any activity that may affect a federally listed endangered or threatened species or designated critical habitat.
State	Review of Hazardous Materials Business Plan and hazardous materials transportation plans.	California Department of Toxic Substances Control (DTSC)	Required for industrial developments' potential use and/or transport of hazardous materials.
State	1602 Lake and Streambed Alteration Agreement	California Dept. of Fish & Wildlife (CDFW)	Required for construction activities in or adjacent to rivers, streams, lakes, wetlands and waterbodies
State	California Streets and Highways Code 660 to 711.21, California Code of Regulations (CCR) 1411.1 to 1411.6	Caltrans, District 11	• Encroachment permit(s) for any improvements to SR-86. • Traffic Control Plans • Permits required for oversized and/or overweight truckloads that exceed legal load limits
State	Construction Stormwater General Permit (Order No. 2022-0057-DWQ NPDES No. CAS000002 as amended).	Regional Water Quality Control Board, Colorado River Basin, Region 7	• Management of stormwater during construction. Preparation and implementation of Stormwater Pollution Prevention Plans (SWPPPs).

TABLE 3-4. POTENTIAL CONSULTATION AND PERMITTING REQUIREMENTS

Jurisdiction Level	Type of Permit/Approval	Agency	Purpose
			• Notice of Intent (NOI) to obtain covered under the general permit.
State	401 Water Quality Certification, Waste Discharge Requirements, and/or Waivers of Waste Discharge Requirements	Regional Water Quality Control Board, Colorado River Basin, Region 7	Required for dredge or fill activities that may result in discharges of pollutants to Waters of the United States or Waters of the State
Local	Specific Plan Amendment	Imperial County Board of Supervisors	Approval of modifications to adopted 2010 McCabe Ranch II Specific Plan
Local	Approval of Tract Map 994	Imperial County Planning and Development Services Department (ICPDSD)	Required for subdivision
Local	Encroachment Permit	Imperial Irrigation District (IID)	Required for encroachment upon existing and proposed IID facilities and or rights of way (if any)
Local	• Authority to Construct • Permit for New Stationary Source(s) • Rule 207 Review; • Rule 310 • Rule 403 Permit (Air Contaminants and Fugitive Dust) • Rule 415 • Rules 800, 801, 803, 805 (Fugitive Dust Rules)	Imperial County Air Pollution Control District (ICAPCD)	Consultation and permitting for air pollution, including fugitive dust, and Greenhouse Gas (GHG emissions that may result from the implementation of future development activities. Authority to Construct - required prior to constructing any equipment which may emit or control air contaminants.
Local	Permit to Operate, Permit for Alteration/ Modification, Emission	Imperial County Air Pollution	Permit to Operate – required prior to constructing any

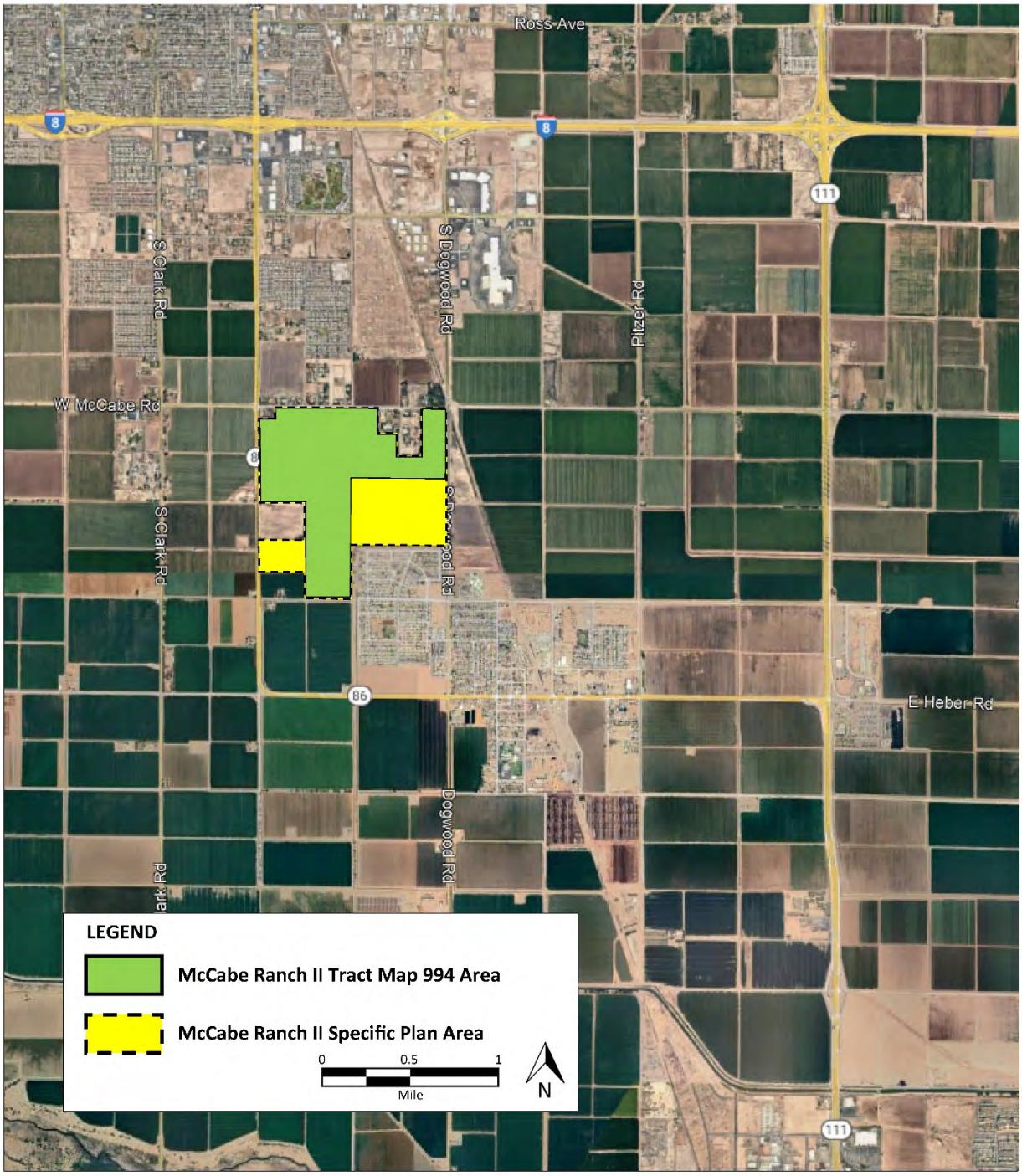
TABLE 3-4. POTENTIAL CONSULTATION AND PERMITTING REQUIREMENTS

Jurisdiction Level	Type of Permit/Approval	Agency	Purpose
	Reduction Credits, Rule 310 and Rule 403 Permit (Fugitive Dust)	Control District (ICAPCD)	equipment which may emit or control air contaminants. associated with future commercial and/or development within the industrial park.
Local	Building Permit(s)	ICPDSD	New construction within the McCabe Ranch II Specific Plan Area
Local	Grading Permit(s)	ICPDSD/DPW	Excavation or earthwork that involves over 2 feet in depth and/or fills over 1 foot in depth.
Local	Encroachment Permit(s) (Public ROW)	Imperial County Department of Public Works (DPW)	Required for any work performed onto, into or within the public ROW (e.g., curb, gutters, sidewalks, storm drains, lane closures, and utility trenches by utility agencies).
Local	Traffic Control Plan(s)	DPW	Traffic management for potential lane closures during construction.
Local	Water Supply Assessment	• Heber Public Utilities District (PUD) • Board of Supervisors	Heber PUD and Board of Supervisor's review and approval of Water Supply Assessment
Local	Annexation to Special District	Heber Public Utilities District	Required for annexation to Heber Public Utilities District
Local	Annexation to Special District	Local Area Formation Commission (LAFCO)	Required for annexation to Heber Public Utilities District



Source: Esri, 2024.

Regional Location
McCabe Ranch II Tract Map 994 and SPA
Figure 3-1



Source: McCabe Realty, LLC, 2024

Project Location Map
McCabe Ranch II Tract Map 994 and SPA
Figure 3-2

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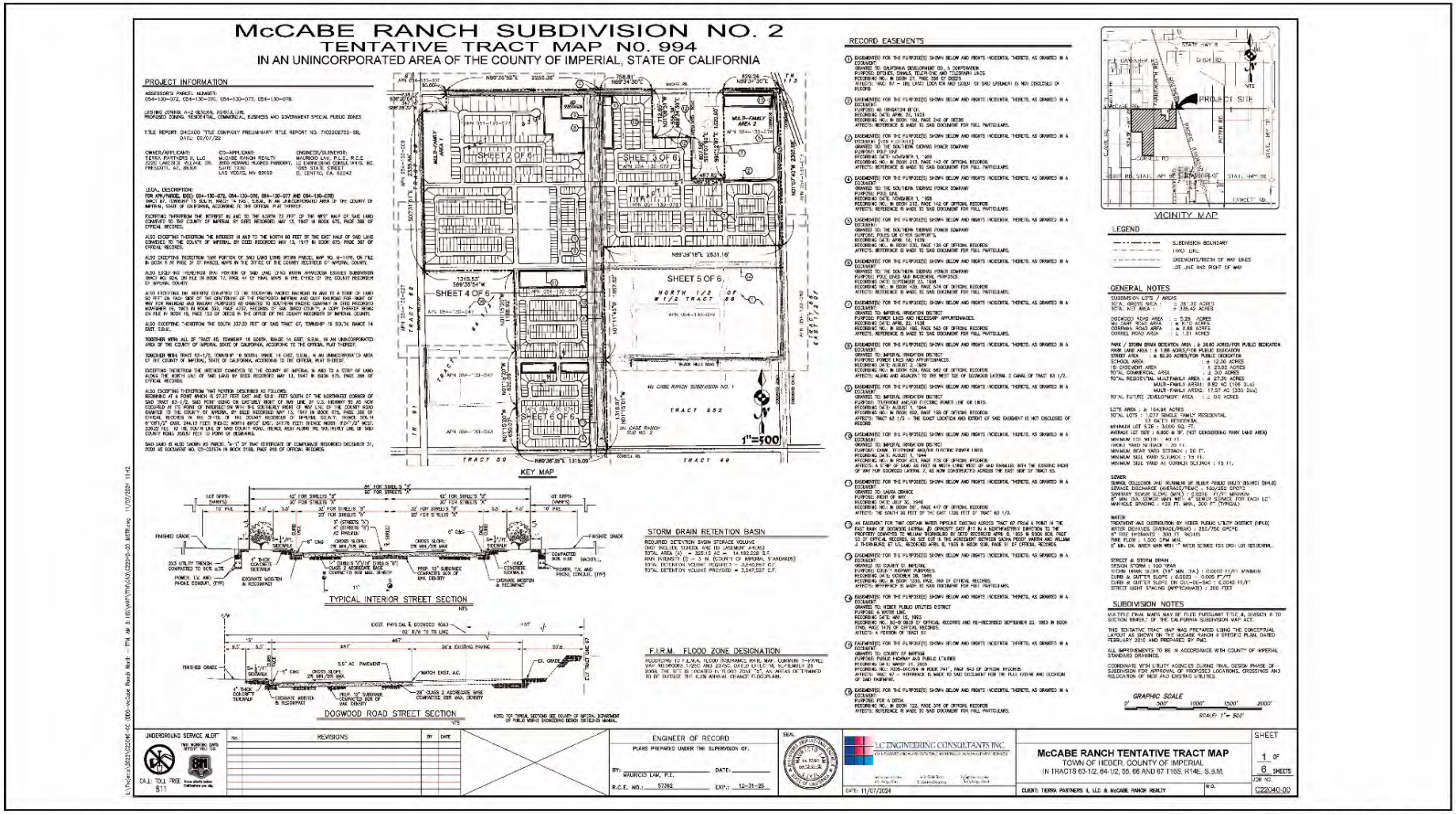

Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 1

McCabe Ranch II TM 994 and SPA

Figure 3-3A

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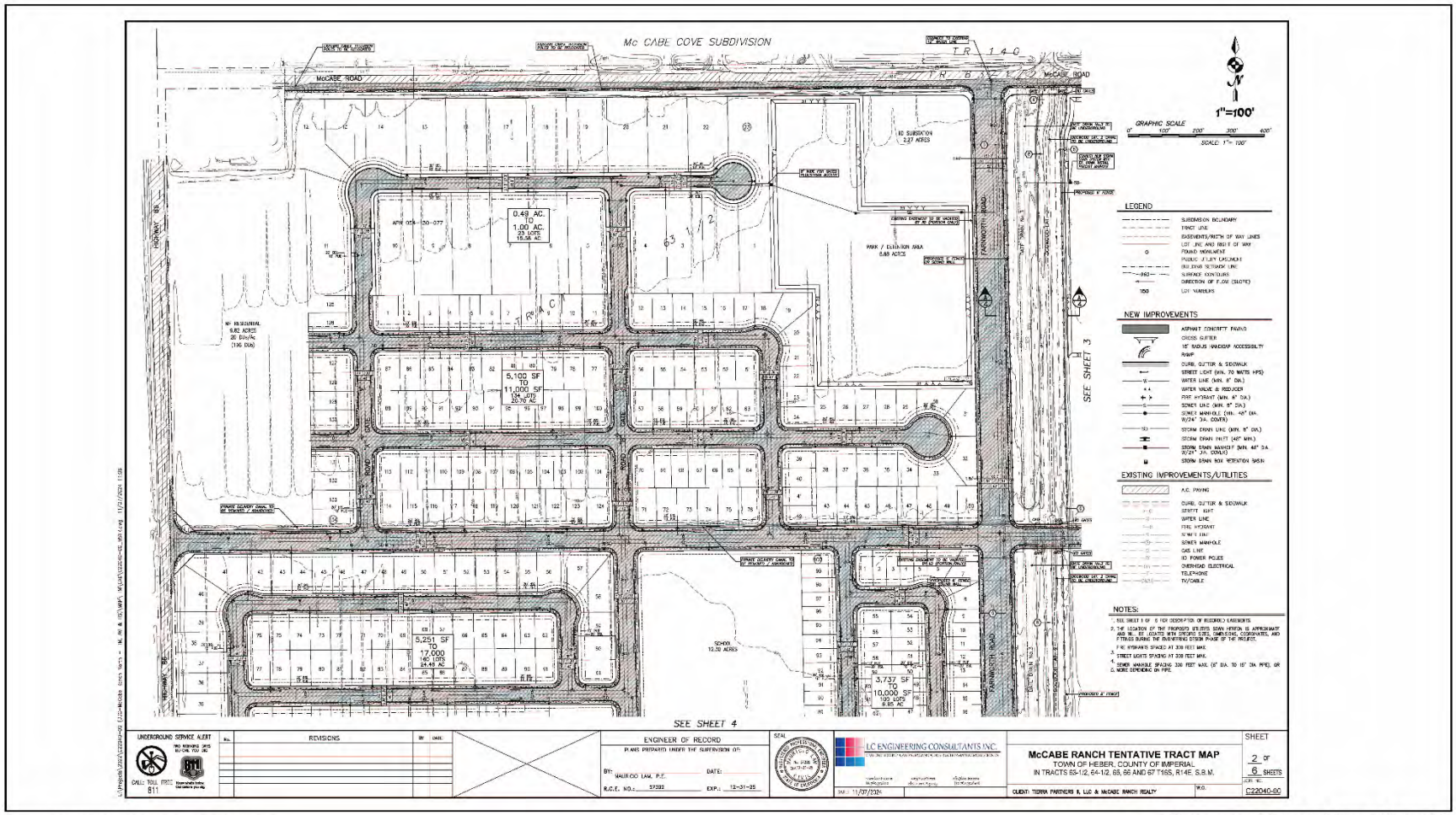

Source: Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 2

McCabe Ranch II TM 994 and SPA

Figure 3-3B

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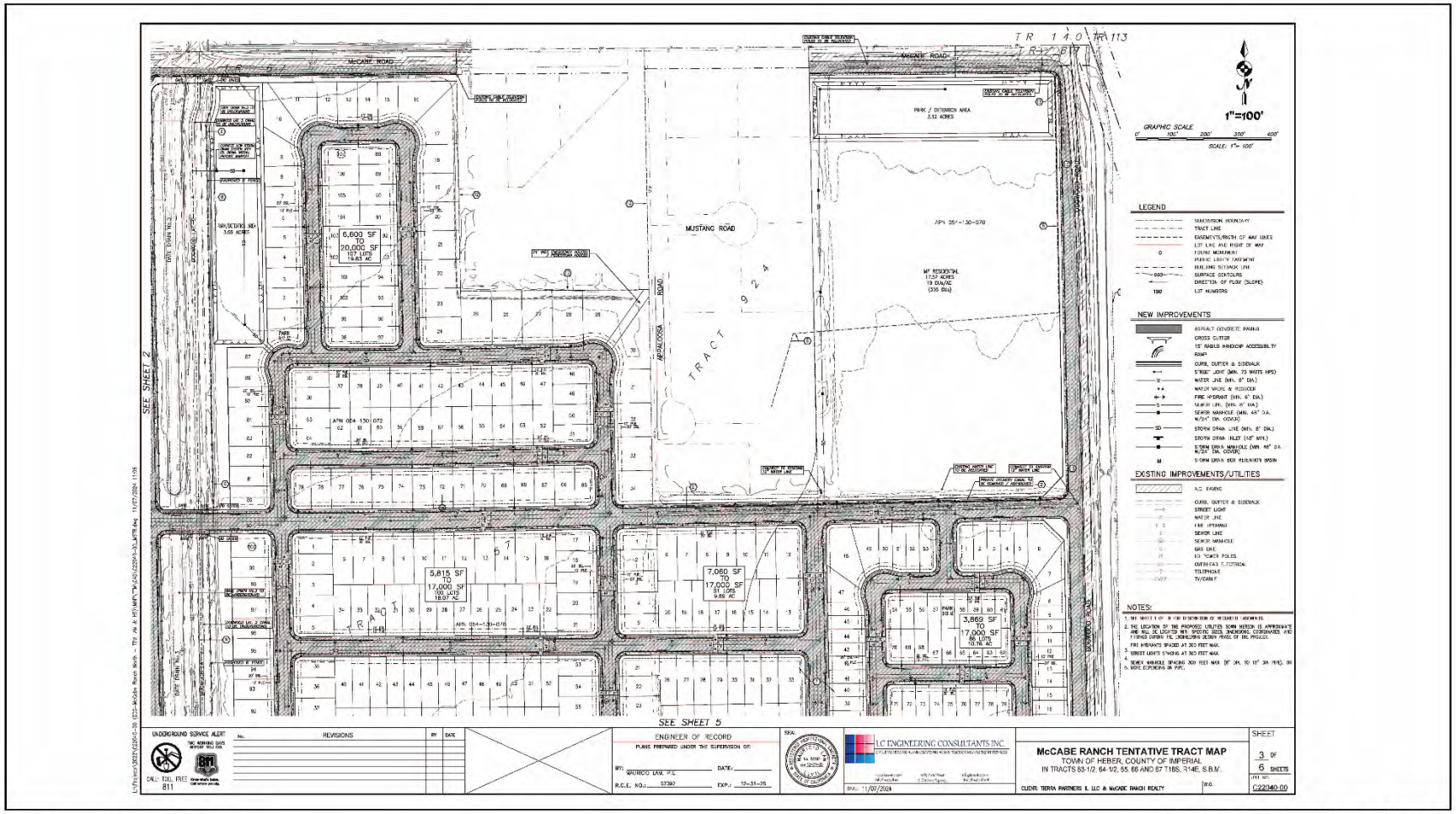

Source: Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 3

McCabe Ranch II TM 994 and SPA

Figure 3-3C

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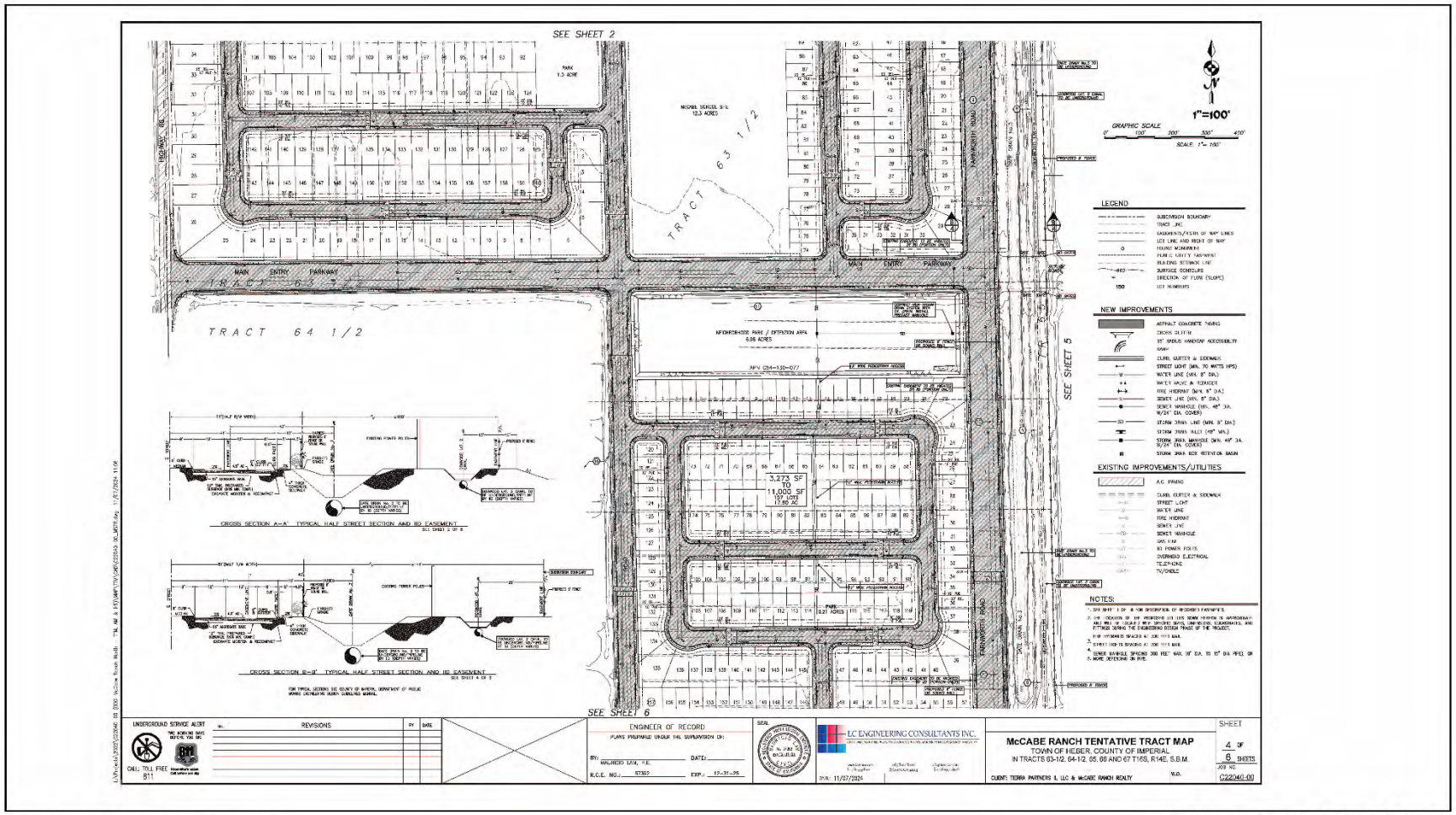

Source: Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 4

McCabe Ranch II TM 994 and SPA

Figure 3-3D

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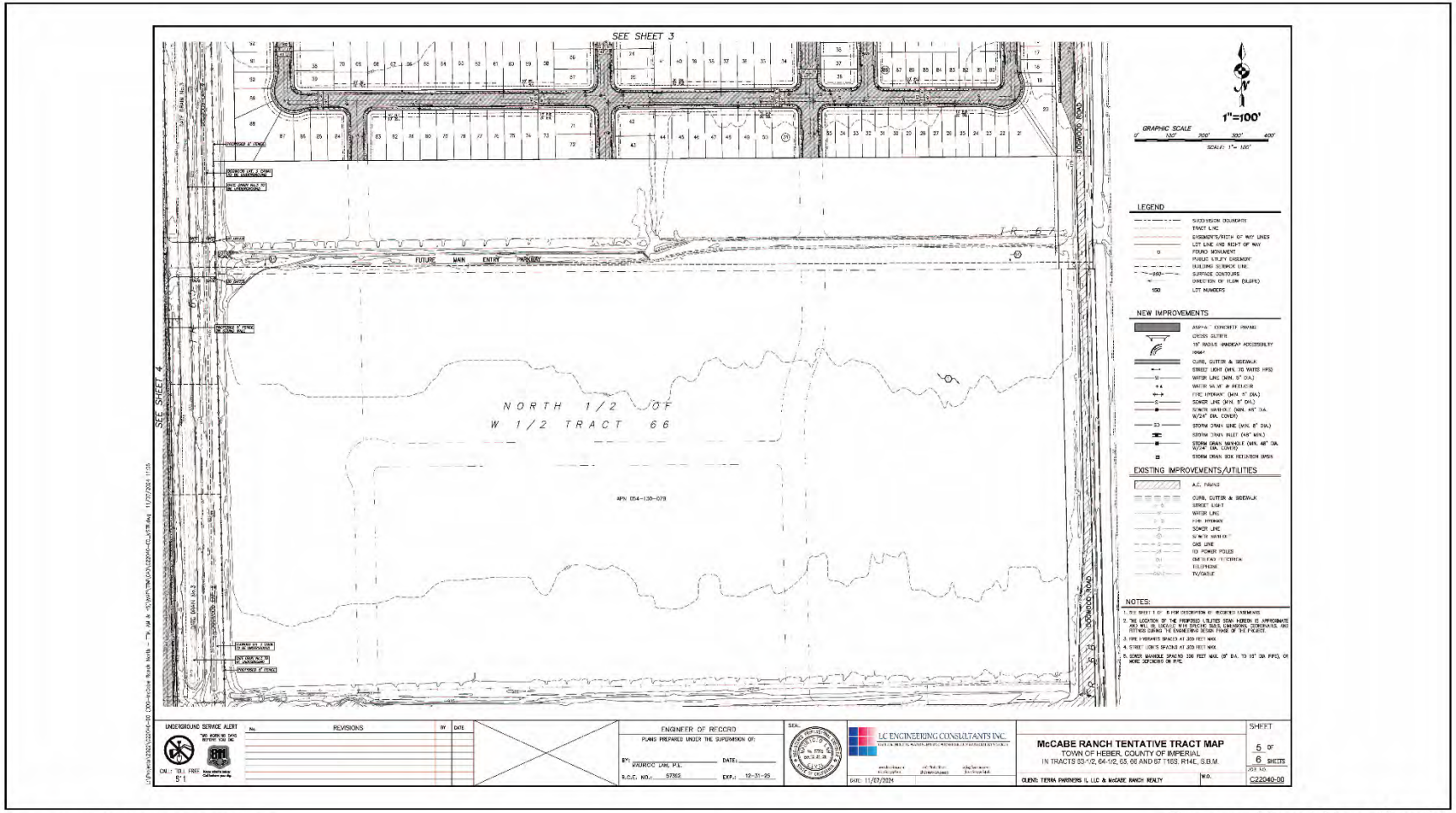

Source: Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 5

McCabe Ranch II TM 994 and SPA

Figure 3-3E

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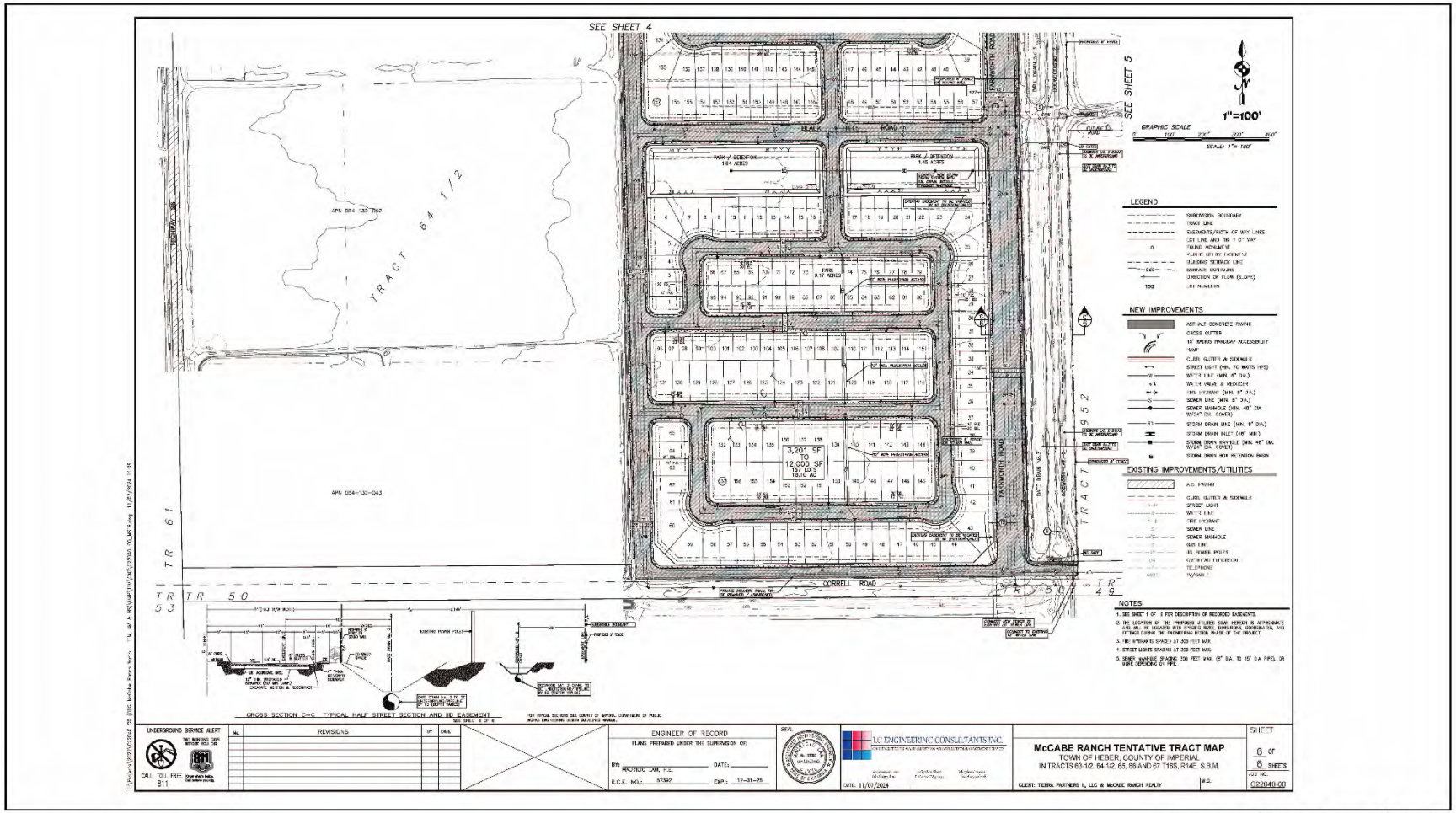

Source: Source: McCabe Ranch Realty, LLC. 2025.

Proposed Tract Map, Sheet 6
McCabe Ranch II TM 994 and SPA
Figure 3-3F

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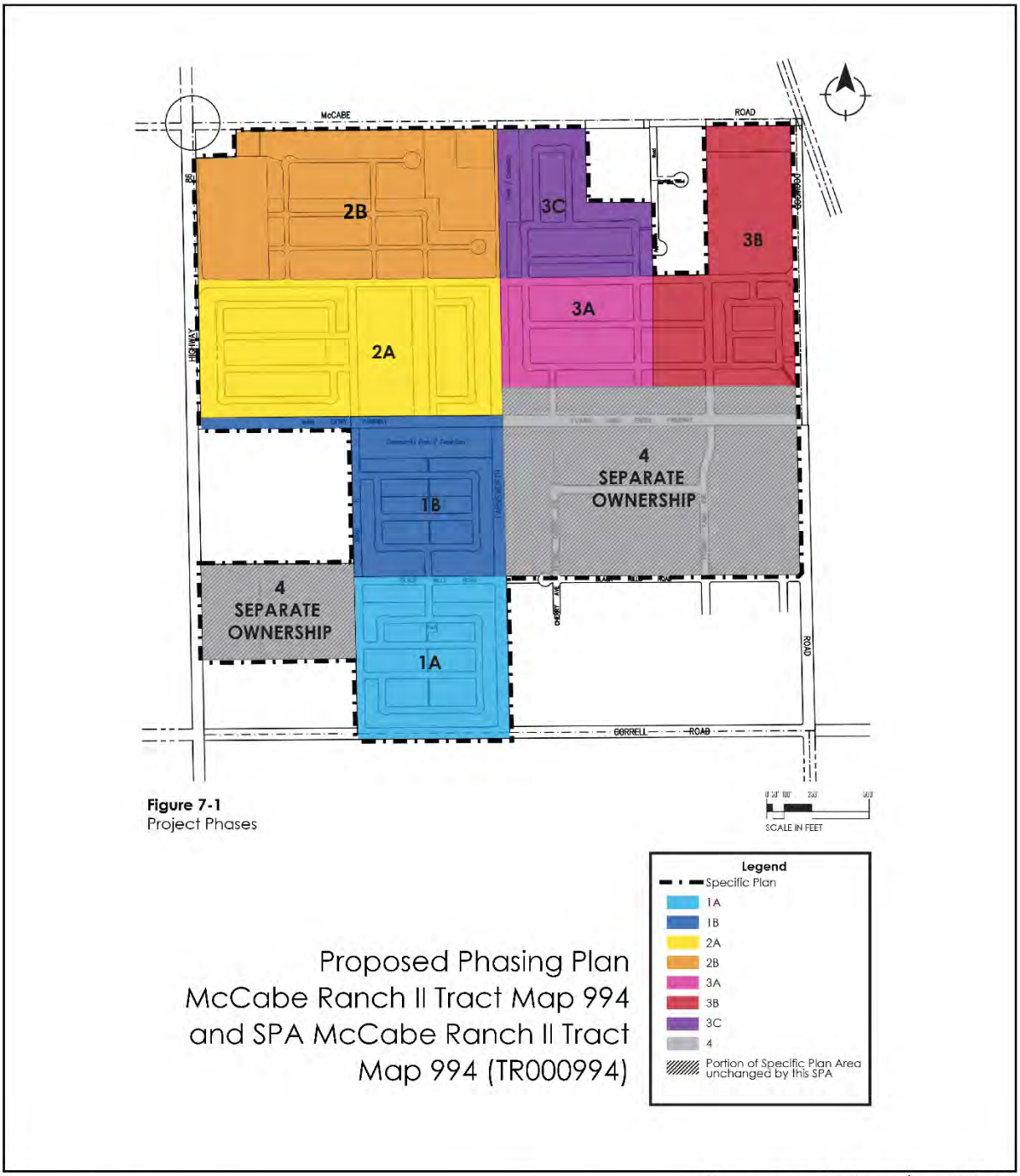

Figure 7-1
Project Phases

Source: McCabe Realty, LLC, 2024

Proposed Phasing Plan
McCabe Ranch II Tract Map 994 and SPA
Figure 3-4

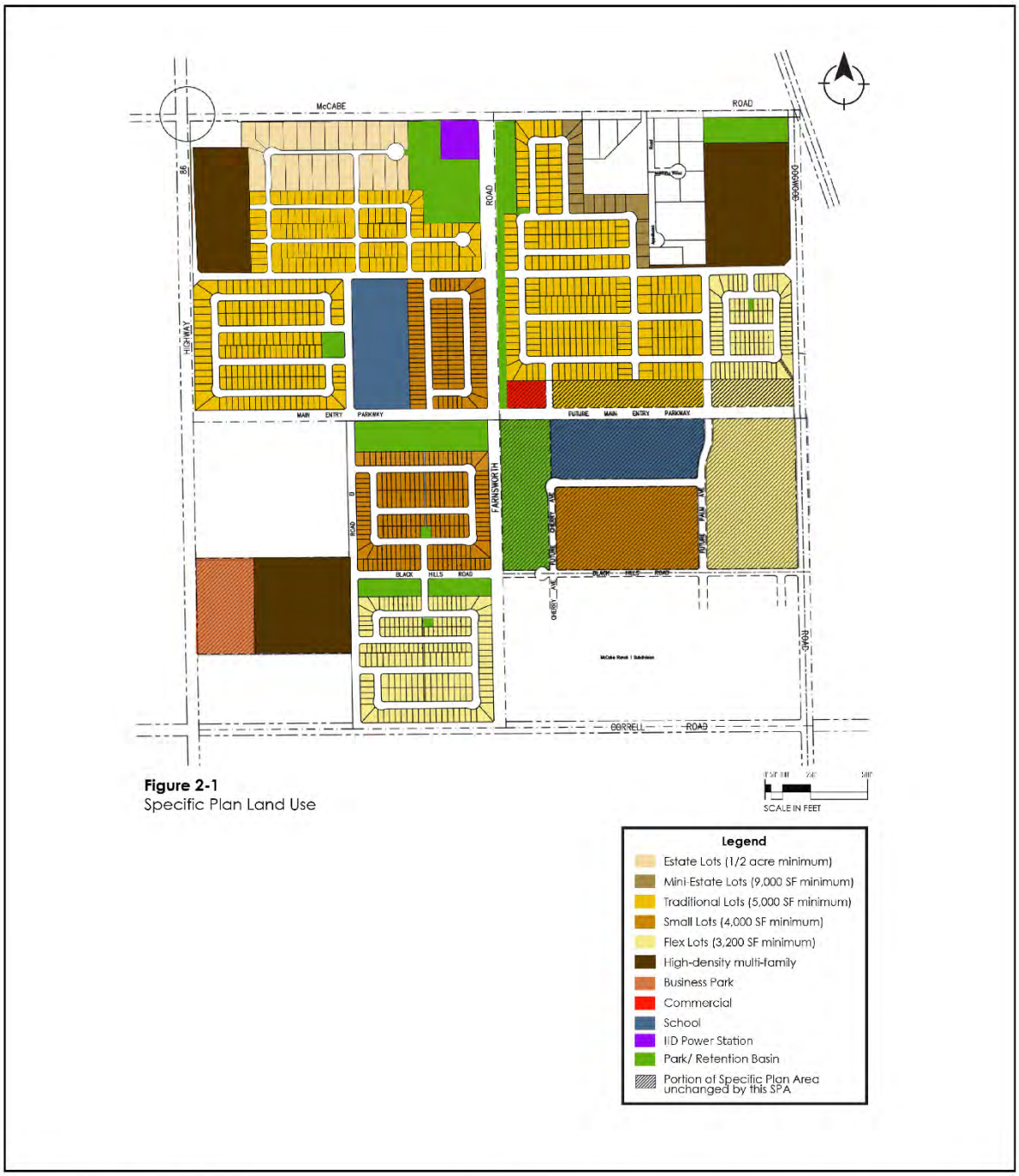

Figure 2-1
Specific Plan Land Use

Source: McCabe Realty, LLC, 2024

McCabe Ranch II Specific Plan Land Uses
McCabe Ranch II TM 994 and SPA
Figure 3-5

4.0. SUPPLEMENTAL ANALYSIS TO THE MCCABE RANCH II SPECIFIC PLAN EIR

4.1. Introduction to the Environmental Analysis

This chapter focuses on evaluating the significant environmental effects of the following:

- McCabe Ranch II Tentative Tract Map 994
- Amendment to McCabe Ranch II Specific Plan
- Annexation to HPUD

These three (3) actions represent the proposed Project (proposed Project or Project) addressed in this Supplemental EIR, which are described in Chapter 3, Project Description.

Chapter 4, Supplemental Analysis to the McCabe Ranch II Specific Plan EIR, describes the existing physical environmental setting (also referred to as "the environmental baseline") for each environmental topic, and the impacts that would result from implementation of the proposed Project. Chapter 4 also compares the Project's impacts with the impacts identified in the Certified EIR. Existing federal, state, and local regulations also shape how the proposed Project is implemented, and provide requirements for avoiding and reducing environmental impacts. For these reasons, a discussion of relevant regulations, plans, programs, and policies pertinent to each environmental topic section is provided. Additionally, as necessary, feasible mitigation measures identified in the Certified EIR and/or mitigation measures identified as part of this supplemental assessment are described in Chapter 4.

As described in Chapter 2, Introduction and Background, the Certified EIR (SCH No. 2024050879) was certified by the County of Imperial on July 10, 2010. The Certified EIR included standard regulations, specific plan policies and other feasible mitigation measures that apply to development projects within the County. The mitigation measures adopted as part of the Certified EIR are related to: Aesthetics, Air Quality, Biological Resources, Cultural and Paleontological Resources, Geology and Soils, Greenhouse Gas Emissions and Climate Change, Hazards and Human Health, Hydrology and Water Quality, Noise, Public Services, Recreation, Transportation, and Public Utilities. Those that are applicable to the proposed Project are included in the discussion of each environmental topic area and will be included in the Mitigation Monitoring and Reporting Program for the Project.

The chapter includes sections for each of the following resource areas:

- 4.2 - Air Quality
- 4.3 - Biological Resources
- 4.4 - Energy
- 4.5 - Environmental Justice
- 4.6 - Greenhouse Gas Emissions
- 4.7 - Land Use and Planning
- 4.8 - Noise
- 4.9 - Public Services

- 4.10 - Transportation/Traffic
- 4.11 - Tribal Cultural Resources
- 4.12 - Utilities and Service Systems
- 4.13 - Project Consistency with Certified EIR

Environmental resources that would not be potentially impacted by the proposed Project (e.g., Wildfire) are not addressed beyond the discussion contained in Chapter 5, Other CEQA Considerations.

4.1.1. Resource Area Format

Each resource area section is organized under the following headings:

- Environmental Setting;
- Regulatory Setting;
- Analysis of Impacts and Significance Determination
- Mitigation Measures; and
- Level of Significance After Mitigation

Information contained under each heading is described below.

Environmental Setting

Each resource area section contains a discussion of the environmental setting (the existing environmental conditions in the vicinity of the entire proposed Project [project area]) and identifies the baseline physical conditions by which the significance of the Project's environmental impacts will be assessed. The baseline physical conditions for the proposed Project are the existing environmental conditions in the Project area at the time of the publication of the Notice of Preparation (NOP) (May 2024). The discussion of the environmental setting in each resource area section contains information necessary to understand the potential impacts of the Project as well as alternatives to the Project (California Environmental Quality Act Guidelines §15125(a)).

Regulatory Setting

Laws, ordinances, regulations, standards, and policies applicable to the Project and resource areas are discussed in the regulatory setting sections for each resource area. Laws and regulations may also identify permits, reviews and approvals necessary for authorization or evaluation and require agency consultation.

Analysis of Project Effects and Significance Determination

A discussion of environmental impacts and mitigation measures for the Project is presented for each environmental resource area, as applicable.

Guidelines for Determination of Significance

Significance thresholds serve as a benchmark for determining if the Project would result in significant impacts when evaluated against the baseline conditions established in the environmental setting and regulatory setting sections for each resource area. The significance criteria used are from the checklist presented in the Appendix G of the California Environmental Quality Act Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500015387).

Environmental Impacts

The impacts analyses presented in this chapter evaluate impacts that may occur from implementation of the Project during construction, operation, and maintenance. Project impacts are then compared to impacts identified in the Certified EIR. This section also identifies feasible mitigation measures, either those identified in the Certified EIR or identified as part of this supplemental analysis, as applicable. The analysis also evaluates additional impacts that could result from implementation of the mitigation measures, if any.

Mitigation Measures

This section provides the text of mitigation measures specific to the resource area that would be implemented to reduce significant impacts of the Project. This section also identifies those mitigation measures that were identified in Certified EIR and are still applicable to the Project and/or new mitigation measures. Please note, mitigation measures identified in the Certified EIR retain their original mitigation number.

Level of Significance After Mitigation

This section describes the "level of significance after mitigation" or the residual environmental impact that remains after mitigation measures have been implemented. If impacts are reduced to an insignificant level, the impact is deemed "less-than-significant after mitigation." If impacts still exceed the significance threshold even with the proposed mitigation, they are classified as "significant and unavoidable impacts."

4.1.2. Terminology

The following terminology is used in this EIR to denote the significance of the Project's environmental impacts:

- **No Impact** indicates that the construction, operation, and maintenance of the project would not have any direct or indirect effects on the environment. It means no change from existing conditions. This impact level does not need mitigation.
- A **Less Than Significant Impact** is one that would not result in a substantial or potentially substantial adverse change in the physical environment. This impact level does not require mitigation, even if feasible, under CEQA.
- A **Significant Effect** on the environment is defined in CEQA Section 21068 as one that would cause "a substantial, or potentially substantial, adverse change in the environment", which includes any of the physical conditions within the area affected by the project as they exist at the time the notice of preparation is published." Levels of significance can vary by project, based on the change in the existing physical condition. Under CEQA, mitigation measures or alternatives to the project must be provided, where feasible, to reduce the magnitude of significant impacts.
- An **Unmitigable Significant Impact** is one that would result in a substantial or potentially substantial adverse effect on the environment, and that could not be reduced to a less than significant level even with any feasible mitigation. Under CEQA, a project with significant and unmitigable impacts could proceed, but the lead agency would be required to prepare a "statement of overriding considerations" in accordance with State CEQA Guidelines Section 15093, explaining why the lead agency would proceed with the project in spite of the potential for significant impacts.

4.1.3. Definitions of Key Terms

The terms listed below are defined to assist reviewers in understanding this SEIR. Additional definitions of terms are listed in CEQA Article 20 Sections 15350 to 15387.

- **Project** means the whole of an action that has the potential to result in a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.
- **Environment** means the physical conditions that exist in the area and would be affected by the proposed Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is that in which significant direct or indirect impacts would occur as a result of the proposed Project. The environment includes both natural and man-made (artificial) conditions.
- **Impacts** analyzed under CEQA must be related to a physical change. Impacts are:
  - Direct or primary impacts that would be caused by a project and would occur at the same time and place; or
  - Indirect or secondary impacts that would be caused by a project and would be later in time or further removed in distance, but that would still be reasonably foreseeable.

Indirect or secondary impacts may include growth-inducing impacts and other impacts related to induced changes in the pattern of land use, population density, growth rate, or related effects on air and water and other natural systems, including ecosystems.

- **Significant Impact on the Environment** means a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by the proposed Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. An economic or social change by itself is not considered a significant impact on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.
- **Mitigation** consists of measures that avoid or substantially reduce the proposed Project's significant environmental impacts by:
  - Avoiding the impact altogether by not taking a certain action or parts of an action;
  - Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
  - Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
  - Reducing or eliminating the impact over time through preservation and maintenance operations during the life of the action; or
  - Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.
- **Cumulative impact** refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
  - The individual impacts may be changes resulting from a single project or separate projects.
  - The cumulative impact from several projects is the change in the environment which results from the incremental impact of the proposed Project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period.

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4.2. Air Quality

4.2.1 Introduction

This section provides the supplemental analysis required to assess potential air quality impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment (proposed Project or Project). It also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR.

The following discussion provides an overview of the existing air quality within the County of Imperial and surrounding region, a summary of applicable regulations; discusses the Project's consistency with current air quality management plans; and analyses potential short-term and long-term air quality impacts from implementation of the Project. Potential sources of odors during construction and operation activities were also be evaluated along with exposure to toxic air contaminants. This section also identifies specific and detailed measures from the Certified EIR that apply to the Project; or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse air quality impacts.

Information used in preparing this section and in the evaluation of potential air quality impacts was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037) (Imperial County, 2010). Information was also derived from the *McCabe Ranch II TM 994 Project Air Quality and Greenhouse Gas Study* prepared by Birdseye Planning Group, which is included as Appendix B of this SEIR (Birdseye Planning Group, 2025a). The *McCabe Ranch II TM 994 Project Air Quality and Greenhouse Gas Study* quantifies air emissions using the most current version of the California Emission Estimator Model (CalEEMod 2022.1).

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. The following provides a summary of air quality issues raised by the Imperial County Air Pollution Control District (ICAPCD) and the CDFW. A detailed listing is provided in **Table 2-1**.

- The Draft EIR should reference the ICAPCD's Programs, Rules and Regulations in conjunction with the ICAPCD's most current CEQA Handbook, and the State Implementation Plans for Ozone, PM2.5 and PM10.
- A Comprehensive Air Quality analysis should include a project description, the ICAPCD's attainment status; an assessment of impacts and health consequences of emissions; a project description; short-term, long-term, daily and yearly emission calculations; and cumulative impact analysis. Mitigation measures must follow District Rules and Regulations. .

- Project alternatives should be included along with a thorough emissions analysis per alternative.
- The CDFW recommended that the Project restrict the use of generators except for temporary use in emergencies; provide power to sites by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems;

4.2.2 Summary of Certified EIR Findings

Potential air quality impacts associated with development within the McCabe Ranch II Specific Plan Area (SPA) were evaluated in Section 4.3 of the Certified EIR. The impacts were evaluated based on the construction and operation emissions expected from the site. Even though several mitigation measures were recommended as presented below, they were not sufficient to reduce the incremental contributions from the Project to air quality conditions in the region to a less than significant level. The Certified EIR concluded that implementation of the McCabe Ranch II Specific Plan would result in the exceedance of regional emission thresholds set forth by the SCAQMD for the emission of volatile organic compounds (VOCs), nitrogen oxides (NO_X), carbon monoxide (CO) and particulate matter (PM10) during both short-term construction and long-term operational activities. The Certified EIR identified mitigation measures MM 4.3.1, MM 4.3.2a, MM 4.3.2b, and MM 4.3.2c to reduce air quality impacts to less than significant.

4.2.3 Environmental Setting

The McCabe Ranch II Specific Plan are is located in Imperial County, the southeastern most county in California. Imperial County is one of the hottest and driest parts of California and is located in a low latitude desert characterized by hot, dry summers and relatively mild winters. Average annual precipitation within Imperial County is less than 3 inches. The normal maximum temperature in January is approximately 70 degrees Fahrenheit (°F), and the normal minimum temperature is approximately 41°F. In July, the normal maximum temperature can exceed 107°F, while the normal minimum temperature is approximately 75°F. Relative humidity in the summer is low, averaging 30 to 50 percent in the early morning and 10 to 20 percent in the afternoon. During the hottest part of the day, the relative humidity can drop below 10 percent. However, the effect of extensive agricultural operations in the widely-irrigated Imperial Valley tends to increase local humidity. The prevailing weather conditions promote intense heating during the day in summer with cooling at night. During the fall, winter, and spring, regional winds tend to come from the northwest. During the summer, winds tend to come from the southeast.

Table 4.2-1 provides a summary of monitoring data at the El Centro Monitoring Station for ozone and PM10. As referenced, the Salton Sea Basin is a nonattainment area for these two pollutants. **Table 4.2-1** also includes monitoring results for PM2.5 for reference purposes.

TABLE 4.2-1: AMBIENT AIR QUALITY DATA FROM EL CENTRO MONITORING STATION (2021 – 2023)

Pollutant	2021	2022	2023
Ozone, ppm - Worst Hour	0.083	0.078	0.091
Number of days of Federal exceedances (>0.070 ppm)*	6	10	15
Particulate Matter <10 microns, g/m3 (PM10_Worst 24 Hours	194.5	554.6	231.6
Number of samples of State exceedances (>50 g/m3)	88	97	65
Number of samples of Federal exceedances (>150 g/m3)	1	2	3
Particulate Matter <2.5 microns, g/m3 (PM2.5) Worst 24 Hours	19.1	30.6	42
Number of samples of State exceedances (>50 g/m3)	0	0	*
Number of samples of Federal exceedances (>150 g/m3)	0	0	*

Notes: *-indicates insufficient data available for reporting purposes.

Source: California Air Resources Board, 2021, 2022, 2023 Annual Air Quality Data Summaries available at https://www.arb.ca.gov/adam/topfour/topfour2.php

Source: Birdseye Planning Group, 2025a (Appendix B).

As shown on **Table 4.2-1**, the federal ozone standard was exceeded at the El Centro monitoring station 6 times during 2021; 10 times during 2022 and 15 times during 2023. Similarly, the State PM10 standard was exceeded 88 times in 2021 and 97 times in 2022 and 65 times during 2023. The federal PM10 standard was exceeded one time in 2021, twice in 2022 and three times in 2023. No PM2.5 exceedances were reported between 2021 and 2023.

4.2.3.1. Air Quality Management Plan

ICAPCD is the local air pollution control agency for Imperial County and the southern portion of the Salton Sea Air Basin. The ICAPCD has primary responsibility for ensuring that state and federal air quality standards are attained and maintained within the ICAPCD's jurisdiction.

Thus, the ICAPCD is responsible for preparing clean air plans, issuing construction and operation permits, monitoring ambient air quality, as well as developing and implementing rules and regulations that govern air quality within Imperial County. The ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP several times since. SIPs for controlling PM10, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the Air Quality Attainment Plan (AQAP) for Imperial County.

A SIP revision for revised rules under ICAPCD Regulation VIII for fugitive dust PM10 was reviewed and by the EPA. The final rule was signed on March 27, 2013, and published in the Federal Register (Federal Register 2013). The ICAPCD adopted the rules on October 16, 2012, to regulate PM10 emissions from sources of fugitive dust (e.g., unpaved roads and disturbed soils in open and agricultural areas). CARB submitted these rules to EPA for approval on November 7, 2012; EPA proposed approval of these revisions to the ICAPCD portion of the California SIP on January 7,

2013. The ICAPCD developed the 2018 PM10 Plan and requested redesignation of Imperial County Planning Area as attainment. The 2018 SIP for PM10 was approved by CARB on December 13, 2018, and received EPA approval on October 19, 2020. ICAPCD adopted the 2013 PM2.5 plan on December 2, 2014. The plan was transmitted to CARB on December 9, 2014. CARB reviewed and approved the plan on December 18, 2015, as a revision to the California State Implementation Plan for Imperial County. The plan was submitted to the U.S. EPA on January 9, 2015, and is pending approval.

Rules and regulations promulgated by the ICAPCD and in the SIP revision that are applicable to the Project include the following:

- **ICAPCD Rule 207.C.1**, New and Modified Stationary Source Review (best available control technologies [BACT]), requires that any new or modified emissions unit that has a potential to emit 25 pounds per day or more of any nonattainment pollutant or its precursors, or 55 pounds per day of H2S, must include BACT as a part of the project.
- **ICAPCD Rule 310 Operational Development Fee,** has been adopted by the ICAPCD as a sound method for mitigating the emissions produced from the operations of new development projects throughout the County of Imperial. All project proponents have the option of either providing off-site mitigation or paying an Operational Development Fee.
- **ICAPCD Rule 400, Nuisances,** forbids the emission of air contaminants or other materials that would cause a nuisance to the public, including non-agricultural related odors.
- **Rule 400.6 Natural Gas Water Heaters**, has been adopted by ICAPCD to limit oxides of nitrogen emissions from natural gas-fired water heaters. This rule shall apply to manufacturers, distributors, retailers, and installers of natural gas-fired Water Heaters with heat input less than 75,000 British Thermal Units per hour, unless exempted pursuant to Section E of this rule.
- **ICPAPCD Rule 428**, Wood Burning Appliances, has been adopted by ICAPCD to limit emissions of particulate matter from wood burning appliances. Effective 04/12/2019, no person shall sell, offer for sale, supply, install, or transfer a new wood burning appliance unless it is a wood heater that complies with New Source Performance Standards (NSPS) certification requirements in effect at the time of installation, has a permanently affixed label certifying compliance with NSPS certification requirements in effect at the time of installation, or a U.S. EPA-Qualified Fireplace.
- **ICAPCD Rule 800**, General Requirements for Control of Fine Particulate Matter (PM-10), requires actions to prevent, reduce, or mitigate PM-10 emissions from anthropogenic (man-made) Fugitive Dust (PM-10) sources generated within Imperial County.
- **ICAPCD Regulation VIII, Rule 801 (Construction and Earthmoving Activities)** establishes a 20 percent opacity limit, requires the implementation of a dust management control plan for all nonresidential projects of 5 acres or more, and requires compliance with

other portions of Regulation VIII regarding bulk materials (Rule 802), carry-out and track-out (Rule 803), and paved and unpaved roads (Rule 805). The rule exempts single-family homes and waives the 20 percent opacity limit in winds over 25 miles per hour (mph) under certain conditions. To comply with this regulation, the applicant would implement Condition of Approval AQ-1 which requires preparation of a Fugitive Dust Suppression Plan to minimize dust generated during construction and ground disturbing activities.

- **ICAPCD Rule 804** Open Areas, requires actions to prevent, reduce or mitigate the amount of fine Particulate Matter (PM-10) emissions generated from Open Areas. Open areas are defined as any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

4.2.3.2. Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The nearest receptors consist of:

- A single-family residence on the southeast corner of SR-86 and McCabe Road;
- Single-family residences located along the north and south sides of McCabe Road, between SR-86 and Dogwood Road;
- Single-family residences north of Correll Road and west of the Dogwood Lateral Two; and,
- Single-family residences on the west side of SR-86 northwest of the main entrance to proposed TM 994.

Additional sensitive receptors in the vicinity of the SPA include Dogwood Elementary School located 0.48 miles southeast of the SPA, Heber Elementary School, located 1.1 miles to the southeast; Esther Huff School for Juveniles located 2.75 miles to the northwest; and Betty Young School located 0.4 miles to the west.

4.2.4 Regulatory Setting

4.2.4.1. Federal and State

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The USEPA is the federal agency designated to administer air quality regulation, while the CARB is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including O_3, carbon monoxide (CO), Nitrogen Dioxide (NO_2), Sulfur Dioxide (SO_2), PM10 and PM2.5, and; lead (Pb). California has also set standards for sulfates, H_2S, vinyl chloride, and visibility reducing particles. **Table 4.2-2** lists the current federal

NAAQS and CAAQS for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

TABLE 4.2-2 STATE AND FEDERAL AMBIENT AIR QUALITY STANDARDS [(a)]

Pollutant	Average Time	California Standards	National Standards
Ozone (O3)	1 hour	0.09 ppm	--
	8 hours	0.070 ppm	0.070 ppm
Carbon Monoxide (CO)	8 hours	9.0 ppm	9 ppm
	1 hour	20 ppm	35 ppm
Nitrogen Dioxide (NO2)	Annual Average	0.030 ppm	0.053 ppm
	1 hour	0.18 ppm	100 ppb
Sulfur Dioxide (SO2)	Annual Average	--	0.03 ppm
	24 hours	0.04 ppm	0.14 ppm
	1 hour	0.25 ppm	75 ppb
Respirable Particulate Matter (PM10)	24 hours	50 mg/m3	150 mg/m3
	Annual Arithmetic Mean	20 mg/m3	--
Fine Particulate Matter (PM2.5)	Annual Arithmetic Mean	12 mg/m3	12 mg/m3
	24 hours	--	35 mg/m3
Sulfates	24 hours	25 mg/m3	--
Lead	30-day Average	1.5 mg/m3	--
	Calendar Quarter	--	1.5 mg/m3
	3-month Rolling Average	--	0.15 mg/m3
Hydrogen Sulfide	1 hour	0.03 ppm	--
Vinyl Chloride	24 hours	0.010 ppm	--

Notes:
ppm = parts per million ppb – parts per billion
mg/m3 = micrograms per cubic meter mg/m3 = milligrams per cubic meter
-- = no standard
(a) California Air Resources Board 2016.
Source: Birdseye Planning Group, 2025a (Appendix B).

4.2.4.2. Local

Imperial County Air Pollution Control District

Local control in air quality management is provided by the CARB through county-level or regional (multi-county) air pollution control districts (APCDs). The CARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The McCabe Ranch SPA is located within the Salton Sea Air Basin (SSAB), which includes all of Imperial County and a portion of central Riverside County. Air quality conditions in the Imperial County portion of the SSAB are under the jurisdiction of the ICAPCD. The remainder of the Basin is managed by the SCAQMD. The ICAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The ICAPCD has established significance thresholds in the 2017 ICAPCD California Environmental Quality Act (CEQA) Handbook for the preparation of Air Quality Impact Assessments (AQIA). The screening criteria within this handbook are used to determine whether a project's total emissions would result in a significant impact as defined by CEQA. Should emissions be found to exceed these thresholds, additional modeling is required to demonstrate that the project's total air quality impacts are below the state and federal ambient air quality standards.

The ICAPCD's screening thresholds for construction and daily operations are shown in **Table 4.2-3**. The CEQA handbook further states that any proposed project with a potential to emit less than the Tier I thresholds during operations may potentially still have adverse impacts on the local air quality and would be required to develop an Initial Study (IS) to help the Lead Agency determine whether the project would have a less than significant impact. On the other hand, if a proposed project's operational development fits within the Tier II classification, it is considered to have a significant impact on regional and local air quality. Therefore, Tier II projects are required to implement all standard design measures as well as all feasible discretionary design measures.

TABLE 4.2-3: SCREENING THRESHOLD FOR CRITERIA POLLUTANTS

Construction Emissions	
Pollutant	**Total Emissions (Pounds per Day)**
PM10 and PM2.5 (Particulate Matter)	150
NOx (Nitrogen Oxide)	100
CO (Carbon Monoxide)	550
Reactive Organic Gases (ROG)	75

TABLE 4.2-3: SCREENING THRESHOLD FOR CRITERIA POLLUTANTS

Operational Emissions		
Pollutant	**Tier I (Pounds per Day)**	**Tier II (Pounds per Day)**
NOx and ROG	Less than 137 lbs/day	Greater than 137 lbs/day
PM10 and SOx	Less than 150 lbs/day	Greater than 150 lbs/day
CO and PM2.5	Less than 550 lbs/day	Greater than 550 lbs/day

Source: ICAPCD, 2017 (Table 1); Birdseye Planning Group, 2025a (Appendix B).

ICAPCD also defined standard design measures for construction equipment and fugitive PM10 must be implemented at all construction sites. The implementation of design measures, as listed in the ICAPCD CEQA handbook, apply to those construction sites which are 5 acres or more for non-residential developments such as the proposed Project. Additionally, in an effort to reduce PM10 or Fugitive Dust from ambient air, the Project would be required to develop a dust management plan consistent with Regulation VIII of ICAPCD's Rules and Regulations. Additionally, the project shall not exceed the 20 percent opacity threshold under Rule 801.

Imperial County General Plan

The Imperial County General Plan contains goals, objectives, policies and/or programs to conserve the natural environment of Imperial County, including air quality. **Table 4.2-4** summarizes the Project's consistency with the applicable air quality goal and objectives from the General Plan.

TABLE 4.2-4: CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Land Use Element (LUE) (a)		
LUE Objective 9.6: Incorporate the strategies of the Imperial County AQAP in land use planning decisions and as amended.	Yes	The AQAP includes the ICAPCD's rules and regulations applicable to land use projects in Imperial County. The proposed Project shall comply with applicable ICAPCD rules and regulations, either through project design or inclusion of mitigation, to obtain the necessary permits for construction.

TABLE 4.2-4: CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
LU Objective 9.7: Implement a review procedure for land use planning and discretionary project review which includes the Imperial County Air Pollution Control District.	Yes	As the air pollution control district for the County, the ICAPCD must review all projects subject to environmental documentation. This review may entail the required inclusion of mitigation or other measures to reduce project emissions to levels acceptable per ICAPCD rules and regulations. The ICAPCD will review all implementing activities of proposed TM 994 and the Specific Plan as part of the CEQA process and is identified as a Responsible Agency under CEQA.
IV. Implementation Programs and Policies **E.4** Prior to approval of development the project proponent shall comply with the Local Air Pollution Control District current air quality attainment regulations in effect at the time of development.	Yes	Mitigation Measure COA AQ-1 requires all future developers to implement applicable requirements under ICAPCD Regulation VIII.
Conservation and Open Space Element (COSE) (b)		
COSE Goal 7: The County shall actively seek to improve and maintain the quality of air in the region. • COSE Objective 7.1: Ensure that all project and facilities comply with current Federal, State, and local requirements for attainment of air quality objectives. • COSE Objective 7.4: Enforce and monitor environmental mitigation measures relating to air quality. • COSE Objective 7.6: Explore and assess strategies to reduce greenhouse gas emissions in the County.	Yes	The ICAPCD seeks to improve and maintain the quality of air in Imperial County through issuance of air quality management plans, rules, and regulations that reflect both state and federal requirements for meeting air quality objectives. The proposed Project has incorporated mitigation measures to comply with the requirements of these plans, rules, and regulations. Enforcement and monitoring requirements for mitigation measures related to air quality are presented in Section 4.2.5 of this EIR. An assessment of project-related greenhouse gas emissions was prepared for the Project and presented the *McCabe Ranch II – Tract Map 994 Project Air Quality/Greenhouse Gas Study* (Appendix B).
IV. Implementation Programs & Policies **B.5 Protection of Air Quality and Addressing Climate Change Policy:** • Reduce PM10 and PM2.5 emissions from unpaved roads, agricultural fields;	Yes	The primary mechanism to implement the Goals and Objectives of the COSE is through incorporating environmental concerns into land use planning. This occurs primarily through the discretionary permit and CEQA processes. Mitigation measures in Section 4.2.7. have been identified to address potentially significant air quality impacts associated with the Project.

TABLE 4.2-4: CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
• Promote alternative transportation programs, policies, and development in order to reduce vehicle miles traveled and address air quality and greenhouse gas emissions.		The Specific Plan includes features such as the provision of "on and off-site pedestrian and bicycle improvements to encourage nonmotorized forms of transportation, as well as the provision of secure bike storage at parks and recreation areas and retail facilities, new bicycle lanes. These features, along with other vehicle mile traveled reduction measures ensure consistency with COSE Policy B.5.
Circulation and Scenic Highways Element (CSHE) (c)		
CSHE Objective 3.8: Attempt to reduce motor vehicle air pollution. Require all major projects to perform an air quality analysis to determine the amount of pollution, as well as the alternative reduction options.	Yes	An assessment of emissions from motor vehicle and other sources was prepared for the Project and presented the *McCabe Ranch II – Tract Map 994 Project Air Quality/Greenhouse Gas Study* (Appendix B).

Sources:
(a) County of Imperial General Plan Land Use Element, 2015.
(b) County of Imperial General Plan Conservation and Open Space Element, 2016.
(c) County of Imperial General Plan Circulation and Scenic Highway Element, 2008.

4.2.5 Thresholds of Significance

Methodology

This air quality analysis conforms to the methodologies recommended in the ICAPCDs CEQA Air Quality Handbook (December 2017). The handbook includes thresholds for emissions associated with both construction and operation of proposed projects. All emissions associated with construction vehicle and equipment operations were calculated using the California Emissions Estimator Model (CalEEMod) software version 2022.1. As referenced, construction emissions would be associated with clearing, grading, excavation and construction of the buildings, paving and application of architectural coatings (i.e., paint). These emissions would consist of diesel exhaust and dust emissions. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders used during the construction of each of the Project phases, defined in Chapter 3.0. The analysis assumed that all construction equipment used would be diesel-powered. Construction emissions associated with development of the proposed Project were determined by estimating the types of on-site equipment (including the number) that would be used during each of the construction phases and the scope of improvements required for each phase.

To determine whether construction of the Project would cause a regional air quality impact, project-related emission increases were compared with the ICAPCD's regional operational emissions thresholds.

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. 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.
3. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people.
4. Expose sensitive receptors to substantial pollutant concentrations.

4.2.6 Analysis of Project Effects and Significance Determination

Impact 4.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Previously Identified Level of Significance

Since certification of the Certified EIR, air quality management plans and other applicable plans have been updated, such as the Imperial County Air Pollution Control Districts' *Air Quality Management Plan* and the *2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter (PM10)* [1]. Similarly, the Certified EIR used the URBEMIS 2007 computer model (version 9.2.4) to calculate short-term construction emissions, long-term operational emissions, and area source emissions associated with energy use. CalEEMod is now the statewide land use emissions modeling tool used to quantify air pollutant and greenhouse gas (GHG) emissions from the construction and operation of development projects. These updated plans and models represent a substantial change in circumstances under which the Project would be implemented, requiring major revisions to the Certified EIR.

Proposed Project Impact Analysis

A project may be inconsistent with the SIP or related AQAP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQAP. As referenced, the ICAPCD meets its regulatory responsibilities through the State of California SIP. The ICAPCD

[1] Approved by both the California Air Resources Board and by the U.S. Environmental Protection Agency.

adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs for controlling PM10, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the AQAP for Imperial County. The ICAPCD air quality plans aim to reduce emissions of criteria pollutants for which the region is in nonattainment by establishing a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards.

As described in Chapter 2.0, the adopted McCabe Ranch II Specific Plan (SP07-004) established a framework for the development of a variety of land uses within the Specific Plan Area (SPA). The Certified EIR analyzed the direct, indirect and cumulative changes to the physical environment that would result from development of a maximum of 2,300 single- and multiple-family dwelling units; 19.2-acres of parks; an 8.4-acre business park; 3.2 acres of commercial uses; two (2) elementary school sites and associated public improvements within the McCabe Ranch II SPA.

The McCabe Ranch II TM 994 and Specific Plan Amendment (Project) would not generate emissions that are substantively different from what was evaluated in the Certified EIR and the Project would be required to comply with applicable ICAPCD rules, regulations, and requirements for minimizing emissions. The development components of the Project would be constructed per applicable California Energy Commission Title 24 and California Green Building Code standards in effect at the time that applications for each individual subsequent is submitted for review. Therefore, the proposed Project would not conflict with or obstruct implementation of the AQAP for Imperial County. Impacts under this criteria would be less than significant.

Impact 4.2-2: Would the Project cumulatively considerable net increase of any criteria pollutant?

Previously Identified Level of Significance

The Certified EIR concluded that construction of the McCabe Ranch II Specific Plan would generate up to 1,037 pounds per day of exhaust and fugitive dust emissions of PM10 and 333 pounds per day of ROG in Phase I. These emissions were found to exceed ICAPCD's recommended daily thresholds of 150 pounds per day for PM10 and 75 pounds per day for ROG. The Certified EIR also found that construction of Phase II would emit 345 pounds per day of PM10. This could expose sensitive receptors to unhealthful concentrations of PM10 and contribute to existing PM10 air quality violations. Implementation of mitigation measures MM 4.3.1, MM 4.3.2.a, MM 4.3.2.b, and MM 4.3.2.c were identified to reduce impacts to less than significance.

Proposed Project Impact Analysis

Site Preparation and Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM10 and PM2.5) and exhaust emissions from heavy construction vehicles.

Construction would generally consist of site preparation, grading, excavation for the fuel tanks, construction of the buildings, application of architectural coating and paving. For modeling purposes, it was assumed that all soils would be balanced onsite and no import/export would be required. Construction emission estimates are shown in **Table 4.2-5** for each phase.

TABLE 4.2-5. ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Phase - (Year)	Maximum Emissions (lbs/day)					
	ROG	NO_x	CO	SOx	PM10	PM2.5
Phase 1 – 2025-2028						
Construction - 2025	3.4	31.7	31.3	0.04	9.2	5.2
Construction - 2026	3.2	29.2	29.8	0.06	9.1	5.1
Construction - 2027	1.5	11.2	24.4	0.03	2.1	0.7
Construction – 2028	50.6	10.6	26.8	0.03	2.0	0.7
Phase 2 – 2029-2033						
Construction – 2029	3.0	26.0	28.9	0.04	8.9	4.9
Construction - 2030	2.9	25.2	29.1	0.06	8.9	4.9
Construction - 2031	2.7	20.7	27.3	0.06	5.0	2.2
Construction 2032	54.0	11.2	27.6	0.04	4.9	1.3
Construction 2033	54.0	11.6	27.8	0.04	5.7	1.5
Phase 3 – 2034-2039						
Construction – 2034	2.6	20.6	24.6	0.04	8.7	4.7
Construction – 2035	2.5	19.2	25.2	0.04	8.6	4.6
Construction - 2036	2.3	15.9	24.6	0.06	5.6	2.0
Construction – 2037	1.7	9.6	23.0	0.03	5.5	1.4
Construction – 2038	51.5	10.3	25.6	0.04	6.5	1.6
Construction - 2039	51.4	10.0	25.0	0.04	6.5	1.6
Phase 4 – 2034 - 2037 *						
Construction - 2034	2.6	20.6	26.2	0.06	8.7	4.7
Construction - 2035	2.4	11.8	40.6	0.05	7.8	2.0
Construction - 2036	2.3	11.5	30.7	0.05	9.1	2.0
Construction - 2037	73.7	12.0	30.8	0.05	9.0	2.3
ICAPCD Regional Thresholds	75	100	550	None	150	None
Threshold Exceeded	***No***	***No***	***No***	***No***	***No***	***No***

Notes: Summer emissions shown

Phase 3 assumes architectural coatings would be applied over a period of 180 days to correspond with completion of both single- and multifamily residences.

Phase 4 assumes architectural coatings would be applied over a one-year period as buildings are completed.

* Assumes Phase 4 construction subsequent to Phase 3,

Source: ICAPCD, 2017 (Table 4); Birdseye Planning Group, 2025a (Appendix B).

The emissions shown in **Table 4.2-5** assume exposed soil areas would be watered twice daily to control fugitive dust emissions. To minimize fugitive dust and general construction emissions, the

applicant would be required to implement fugitive dust control measures per ICAPCD Rules 801 and 804 as referenced herein. The fugitive dust control plan and related requirements to control fugitive dust emissions during construction are addressed in Condition of Approval AQ-1 (see Section 4.2.7.2).

Site Operational Emissions (Long Term)

An analysis of maximum daily emissions during operation was conducted to determine if emissions would exceed the daily thresholds for any pollutant of concern. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), and area sources including landscape equipment and architectural coating emissions as the structures are repainted over the life of the project. Operational emissions were modeled for the build out year of each phase including 2027 for Phase 1; 2033 for Phase 2; 2039 for Phase 3; and 2039 for Phase 4.

Table 4.2-6 summarizes emissions associated with operation of the proposed McCabe Ranch II TM 994 and the Specific Plan Amendment. Emissions from Phases 1, 2 and 3 are those that would result with implementation of the proposed McCabe Ranch II TM 994 Project. Emissions from Phase 4, represents development of the remainder of the Specific Plan. As shown, daily emissions associated with individual Phases 1, 2, 3 and 4, would not exceed the ICAPCD standards and would not result in significant long-term operation air quality impacts.

TABLE 4.2-6. ESTIMATED OPERATIONAL EMISSIONS

Construction Phase	Maximum Emissions (lbs/day) [b]					
	ROG	NO_x	CO	SOx	PM10	PM2.5
Mobile, Area and Energy						
Phase 1	28.8	9.7	87.0	0.1	11.4	3.1
Phase 2	51.3	17.5	165.4	0.3	26.1	7.0
Phase 3	43.1	13.9	124.7	0.2	21.1	5.7
Total TTM 994 Emissions	**123.2**	**44.1**	**377.1**	**0.6**	**58.6**	**15.8**
ICAPCD Thresholds [a]	**137**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Phase 4	80.1	28.6	282.8	0.57	51.3	13.5
ICAPCD Regional Thresholds	**137**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: Summer emissions shown.
Source: (a) = ICAPCD, 2017 (Table 1);
(b) -= Birdseye Planning Group, 2025a (Appendix B).

Impact 4.2-3: Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Previously Identified Level of Significance

Impact 4.3.6 of the Certified EIR found that implementation of the McCabe Ranch II Specific Plan would introduce diesel PM emissions from off-road equipment during construction and from diesel-fueled trucks and motor vehicles accessing the site during long-term operations. On-site sources of toxic air contaminants (TACs) would be primarily diesel trucks accessing the commercial portion of the project and buses serving the schools within the project. Based on CARB guidance documents, the McCabe Ranch II Specific Plan was not found to meet the definition of a major source of diesel PM and would not be subject to the siting criteria. The residents or future workers with the McCabe Ranch II SPA were not expected to be exposed to unhealthful levels of TACs for two primary reasons. First, there are no existing or planned land uses in the project vicinity that would be point sources of substantial TAC emissions. Additionally, CARB has passed a number of Airborne Toxic Control Measures to reduce the public's exposure to emissions of diesel PM, including measures to limit idling of diesel-powered delivery trucks.

Given the limited number of diesel-powered trucks trips during operation of the McCabe Ranch II Specific Plan and the ATCMs to reduce public exposure to diesel PM emission, sensitive receptors exposure from TACs would be limited. Given the construction schedule, the proposed project would not result in a long-term (i.e., 70-years) substantial source of TAC emissions and therefore, the Certified EIR considered impacts to be less than significant.

Proposed Project Impact Analysis

Construction-Related Toxic Air Contaminant Impacts.

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project and truck traffic. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term phased construction schedule, the proposed project would not result in a long-term (i.e., 70-years) substantial source of toxic air contaminant emissions and related individual cancer risk.

Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed Project phases or components of each phase.

Impact 4.2-4: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Previously Identified Level of Significance

Impact 4.3.6 of the Certified EIR found that implementation of the McCabe Ranch II Specific Plan would expose existing or future sensitive receptors to short-term construction emissions which could create objectionable odors. The Certified EIR concluded that construction-related emissions and related odors would be temporary; would disperse rapidly with distance from the source; and would not result in the frequent exposure of receptors to objectionable odor emissions. Further, the Certified EIR found that the McCabe Ranch II Specific Plan does not include land uses that are associated with odor complaints. Additionally, ICAPCD's Nuisance Rule (Rule 407) governs the discharge from any source of such quantities of air contaminants, which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public. Lastly, Specific Plan policies (Policy Air-1) would reduce emissions from construction equipment and architectural coatings. As such, implementation of the Specific Plan was not expected to introduce a new source of significant odors nor expose new sensitive receptors to existing sources of significant odors. This impact was considered less than significant.

Proposed Project Impact Analysis

Potential sources of odor during construction activities include equipment exhaust and activities such as paving. The objectionable odors that may be produced during the construction process would occur periodically and end when construction is completed. Consistent with the findings of the Certified EIR, the proposed McCabe Ranch II TM and Specific Plan Amendment would construct and operate a new residential, commercial, business park and school uses. These uses are not associated with emissions (such as those leading to odors) adversely affecting a substantial number of people that could rise to the level of significance. Therefore, odor impacts would be less than significant and no mitigation would be required.

4.2.7 Mitigation Measures

4.2.7.1 Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Mitigation measure MM 4.3.1, identified in the Certified EIR to reduce significant construction related air quality and odor impacts has been modified to reflect the ICAPDC's current rules, regulations and mitigation measures. Mitigation measures MM 4.3.2a, MM 4.3.2b, and MM 4.3.2c continue to be applicable to the proposed Project. ~~Strikeout~~ formatting is used to depict language in previously approved mitigation measures that is no longer applicable to the proposed Project.

MM 4.3.1 Implement ICAPCD Regulation VIII

Future developers shall implement applicable requirements under ICAPCD Regulation VIII. According to the ICAPCD CEQA Handbook, the standard mitigation measures for fugitive PM10 control and for construction equipment shall be implemented at all construction sites, regardless of the size. Project developers shall abide by standard and discretionary mitigation measures listed in Section 7.1 of the Imperial County 2017 CEQA Air Quality Handbook. ~~The measures will be reviewed on a project-by-project basis to determine the applicable mitigation measures for subsequent environmental documents.~~ The following are the standard mitigation measures identified in the ICAPCD CEQA Handbook.

Standard Mitigation Measures for Fugitive PM10 Control

a. All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.

b. All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.

c. All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.

d. The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.

e. All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area.

f. Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.

g. The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a “Temporary Unpaved Road”. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.

In order to provide a greater degree of PM10 reductions, above that required by Regulation VIII, the following *Discretionary Mitigation Measures for Fugitive PM10 Control* shall be required as recommended by ICAPCD:

Discretionary Mitigation Measures for Fugitive PM10 Control

a. Water exposed soil with adequate frequency for continued moist soil.

b. Replace ground cover in disturbed areas as quickly as possible

c. Automatic sprinkler system installed on all soil piles

d. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

e. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees

f. Implement a shuttle service to and from retail services and food establishments during lunch hours

Standard Mitigation Measures for Construction Equipment

a. Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.

b. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.

c. Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use

d. Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

Enhanced Mitigation Measures for Construction Equipment

a. Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.

b. Implement activity management (e.g., rescheduling activities to reduce short-term impacts).

~~**Mitigation Measures for ROG Control**~~

~~a. Whenever technologically feasible, architectural coating for interiors and exteriors in both residential and non- residential applications shall use low-ROG coatings that, on a weighted average, are 100 grams per liter of ROGs or less.~~

~~b. The project sponsor shall apply for Emissions Reduction Credits (ERC) certificate from the ICAPCD.~~

Timing/Implementation: *Prior to and during construction activities*

Enforcement/Monitoring: *Imperial County Department of Building and Public Works.*

MM 4.3.2a Reduce Operational Impacts

To reduce operational impacts, the following mitigation measures shall be implemented by developers for subsequent projects within the McCabe Ranch II Specific Plan area.

a. Applicants shall be required to comply with the applicable mitigation measures in the Air Quality Attainment Plan, District Rules, Traffic Control Measures, and Regulation VIII for the ICAPCD.

b. Applicants shall provide bicycle parking.

c. Applicants shall provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles.

d. Applicants shall use low-energy parking lot and streetlights (i.e., sodium).

e. Applicants shall use double-paned windows.

f. Applicants shall install door sweeps and weatherstripping if more efficient doors and windows are not available.

g. Project developers of commercial/business park uses shall implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.

Timing/Implementation: *Prior to and during construction activities.*

Enforcement/Monitoring: *ICPDSD and Public Works.*

MM 4.3.2b ICAPCD Rule 310 Compliance

Future developers shall comply with ICAPCD Rule 310.

Timing/Implementation: *Prior to and during construction activities*

Enforcement/Monitoring: *Imperial County Department of Building and Public Works.*

MM 4.3.2c ICAPCD Standard and Discretionary Mitigation Measures

Project developers shall abide by standard and discretionary mitigation measures listed in Section 7.2 of the Imperial County 2017 CEQA Air Quality Handbook including:

RESIDENTIAL PROJECTS

Standard mitigation measures for residential projects include the following site design and energy efficiency standards:

Standard Site Design Measures

a. Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel;

b. Allocate easements or land dedications for bikeways and pedestrian walkways;

c. Provide continuous sidewalks separated from the roadway by landscaping and on-street parking. Adequate lighting for sidewalks must be provided, along with crosswalks at intersections; and

d. Bicycle storage at apartment complexes or condos without garages.

Standard Residential Energy Efficiency Measures

a. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24.

COMMERCIAL PROJECTS

Standard mitigation measures for commercial projects include the following site design and energy efficiency standards:

Standard Site Design Measures

a. Provide on-site bicycle lockers and/or racks;

b. Provide on-site eating, refrigeration and food vending facilities to reduce lunchtime trips;

c. Provide shower and locker facilities to encourage employees to bike and/or walk to work;

d. Provide for paving a minimum of 100 feet from the property line for commercial driveways that access County paved roads as per County Standard Commercial Driveway Detail 410B (formerly SW-131A).

Standard Energy Efficiency Measures

a. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24.

Additionally, project developers shall incorporate the following Discretionary Site Design Mitigation measures listed in Section 7.3 of the Imperial County 2017 CEQA Air Quality Handbook including:

RESIDENTIAL PROJECTS

Discretionary Site Design Measures

a. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to project.

b. For bus service within a ¼ mile of the Project provide bus stop improvements such as shelters, route information, benches and lighting.

c. Increase street tree planting.

d. Outdoor electrical outlets to encourage the use of electric appliances and tools.

e. Provide bikeway lanes and/or link new comparable bikeway lanes to already existing lanes.

f. Increase the number of bicycle routes/lanes.

g. Provide pedestrian signalization and signage to improve pedestrian safety.

h. Synchronize traffic lights on streets impacted by development

COMMERCIAL PROJECTS

Discretionary Site Design Measures

a. Increase street tree planting

b. Shade tree planting in parking lots to reduce evaporative emissions from parked vehicles.

c. Increase number of bicycle routes/lanes.

d. If the project is located on an established transit route, improve public transit accessibility by providing transit turnouts with direct pedestrian access to protect or improve transit stop amenities.

e. For bus service within a ¼ mile of the project provide bus stop improvements such as shelters, route information, benches and lighting

f. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.

g. Provide pedestrian signalization and signage to improve pedestrian safety.

h. Synchronize traffic lights on streets impacted by development.

Discretionary Residential Energy Efficiency Measures

a. Use roof material with a solar reflectance value meeting the EPA/DEO Energy Star® rating to reduce summer cooling needs.

b. Use built-in energy efficient appliances.

c. Use double-paned windows.

d. Use low energy street lighting (i.e., sodium).

e. Use energy efficient interior lighting.

f. Use low energy traffic signals (i.e., light emitting diode or LED).

g. Install door sweeps and weather stripping if more efficient doors and windows are not available.

h. Install high efficiency gas/electric space heating.

INDUSTRIAL PROJECTS

a. Implement carpool/vanpool programs and incentives (i.e., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.)

b. Provide for shuttle/mini bus service such as to establish a shuttle service from residential care areas to worksite.

c. Provide preferential carpool and vanpool parking.

d. Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc. if the project is located on an established transit route.

e. Design and locate buildings to facilitate transit access (i.e., locate building entrances near transit stops, eliminate building setbacks, etc.)

f. Provide incentives to employees to take public transportation, walk, bike, etc.

g. Provide pedestrian signalization and signage to improve pedestrian safety.

h. Implement on-site circulation design elements in parking lots to reduce vehicle queing and improve the pedestrian environment.

i. Provide on-site bicycle and motorcycle parking. Such as providing weather-protected bicycle parking for employees.

j. Provide safe, direct access for bicyclists to adjacent bicycle routes.

k. Provide shower and locker facilities to encourage employees to bike and/or walk to work – typically, one shower and three lockers for every 25 employees.

l. Provide on-site eating, refrigeration and food vending facilities to reduce lunchtime trips.

m. Increase street tree planting.

n. Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24.

o. Use low emission fleet vehicles such as TLEV, ULEV, LEV, ZEV

p. Install an electrical vehicle charging station with both conductive and inductive charging capabilities.

q. Use built-in energy efficient appliances, where applicable.

r. Use double-paned windows

s. Use low energy parking lot and street lights

t. Use energy efficient interior lighting.

Discretionary Commercial Energy Efficiency Measures

a. Use roof material with a solar reflectance value meeting the EPA/DOE Energy Star® rating to reduce summer cooling needs.

b. Use high efficiency gas or solar water heaters.

c. Use built-in energy efficient appliances.

d. Use double-paned windows.

e. Use low energy parking lot and streetlights (i.e., sodium).

f. Use energy efficient interior lighting.

g. Use low energy traffic signals (i.e., light emitting diode).

h. Install door sweeps and weather stripping if more efficient doors and windows are not available.

Timing/Implementation: *Prior to issuance of Building or Architectural Permits*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department*

4.2.7.1. Newly Proposed Mitigation Measures

In compliance with ICAPCD rules, Condition of Approval AQ-1 has been identified to reduce construction-related air quality impacts.

Condition of Approval AQ-1: Enhanced Dust Control Plan

Prior to the commencement of construction for each subsequent development activity or infrastructure improvement, the project applicant shall submit an Enhanced Dust Control Plan to the ICAPCD for approval. The Enhanced Dust Control Plan will identify all sources of PM10 emissions and associated mitigation measures during the construction and operational phases (see

Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Enhanced Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control and address the following parameters as stipulated in ICAPCD *Regulation VIII - Fugitive Dust Control Measures:*

a. All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.

b. All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.

c. All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.

d. The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.

e. All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area.

f. Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.

g. The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.

With implementation of Condition of Approval AQ-1, construction impacts related to fugitive dust emissions would be less than significant. No additional mitigation would be required.

Timing/Implementation: *Prior to issuance of Building or Architectural Permits*

Enforcement/Monitoring: *ICPDSD and ICAPCD.*

4.2.8 Level of Significance After Mitigation

With implementation of MM 4.3.2a, MM 4.3.2b, MM 4.3.2c and Condition of Approval AQ-1, air quality impacts would be less than significant.

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4.3 Biological Resources

4.3.1 Introduction

This section provides the supplemental analysis required to assess potential biological resource impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment. It also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) as identified in the Certified EIR.

The following discussion addresses the existing conditions in the Project area, identifies applicable regulations, identifies and analyzes environmental impacts (including impacts on sensitive species and habitat). This section also identifies specific and detailed measures from the Certified EIR that apply to the Project, or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse impacts on biological resources.

Report and Survey Results

Information used in preparing this section and in the evaluation of potential impacts to biological resources was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037) as well as from the Bio*logical Resources and Habitat Assessment Report prepare for the McCabe Ranch II Tract Map 994 and Specific Plan Amendment* (Biology Report) prepared by Barrett Biological Enterprises (Barrett Biological, 2025: Appendix C).

To identify the potential for occurrence of sensitive plant and animal species, vegetation communities, and habitats that could support sensitive plant and animal species, Barrett's biologists conducted a general reconnaissance survey and burrowing owl protocol surveys within the proposed Project Biological Survey Area (BSA). The BSA consists of the 351.2-acre Project area and a 500-foot buffer zone around the perimeter of the proposed TM 994 area (**Figure 4.3-1**). General biological surveys and burrowing owl protocol surveys were conducted on April 9th, April 30th, May 24th and June 19, 2024 (**Table 4.3-1**).

TABLE 4.3-1: FIELD SURVEY SCHEDULE

Date/Time Conditions	Start and End Time	Surveyors	Survey Duration (Hours)
4/09/24 64-76ºF clear, 7-10 mph	0735 - 0945	Glenna Barrett/Jacob Calanno/Michel Remington	6.3
4/30/24 65-75ºF clear, 0-3 mph	0705 - 0835	Glenna Barrett/Adolpho Ng/Jeremy Sheffler	4.5
5/24/24 70-74ºF clear, 4-8 mph	0700 - 0830	Glenna Barrett/ Adolpho Ng/Jeremy Sheffler	4.5

TABLE 4.3-1: FIELD SURVEY SCHEDULE

Date/Time Conditions	Start and End Time	Surveyors	Survey Duration (Hours)
6/14/24 79-89ºF clear, 0-8 mph	0700 - 0845	Glenna Barrett/Adolpho Ng Michel Remington	5.25
		Total Survey Hours	**20.55**

Source: Barrett Biological, 2025 (Appendix C)

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. The following provides a summary of the biological resource issues raised by the CDFW. A detailed listing is provided in **Table 2-1**.

- The Draft EIR should include an assessment of the various habitat types located within the project footprint and adjoining off-site habitat areas that could be directly or indicated impacted as well as a map that identifies the location of each habitat type.
- The Draft EIR should include information from the California Natural Diversity Database (CNDDB) and a general biological inventory of the fish, amphibians, reptile, bird, and mammal species that are present or have the potential to be present on-site and within off-site adjacent areas that could be affected.
- The Draft EIR should include a complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and adjoining off-site habitat areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (California Fish and Game [Fish & G.] Code, § 3511).
- Imperial County should follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012) including conduct of a habitat assessment, surveys and an impact assessment.
- A thorough, recent, floristic-based assessment of special status plants and natural communities should be included in the Draft EIR.
- The Draft EIR should include a discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage.
- The Draft EIR should include a discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint,

- The Draft EIR should include an evaluation of impacts to adjacent open space lands from construction, operation and maintenance of the project .
- The Draft EIR should include a cumulative effects analysis developed as described under CEQA Guidelines section 15130.
- The Draft EIR should describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects.
- The Draft EIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to an extent feasible.
- When proposing mitigation measures to avoid, minimize, or mitigate impacts, the Draft EIR should consider fully protected species; sensitive plant communities; California Species of Special Concern; the removal and/or translocation of species; Nesting Birds and Migratory Bird Treaty Act Surveys; and Habitat Revegetation/Restoration Plans.
- A California Endangered Species Act (CESA) Incidental Take Permit (ITP) should be obtained if the Project has the potential to result in "take" of State-listed CESA species, either through construction or over the life of the project.
- If it is determined that the proposed Project activities may substantially adversely affect CDFW jurisdictional drains/canals and associated fish and wildlife resources then a Lake and Streambed Alteration (LSA) Agreement must be obtained.
- Water-wise concepts should be incorporated in any Project landscape design plans.
- The Draft EIR should include an analysis of construction-related noise impacts to wildlife and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.
- The Draft EIR should include lighting design specifications for all artificial nighttime lighting, an analysis of the direct and indirect impacts of artificial nighttime lighting on biological resources, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.

4.3.2 Summary of Certified EIR Findings

Potential biological resource impacts associated with development within the McCabe Ranch II Specific Plan Area (SPA) were evaluated in Section 4.4 of the Certified EIR. Due to the developed nature of the study area and surrounding vicinity, native vegetation communities and naturally-occurring habitats were not found. Vegetation within and adjacent to the BSA was found to consist primarily of agriculture and urban communities.

A total of nine (9) special status plant species were found to have the potential to occur on or within the immediate vicinity of the SPA.. However, because the entire SPA had been disturbed by agricultural uses, no special-status plant species were identified during surveys for the Certified EIR. The CNDDB data search conducted for the Certified EIR identified the occurrence of a single special-status plant, Abrams' spurge (*Chamaesyce abramsiana*), within one mile of the SPA; however, the SPA did not contain suitable habitat to support this species.

Additionally, surveys for the Certified EIR found five (5) special-status wildlife species had the potential to occur in the SPA including:

- Colorado River toad (*Bufo alvarius*)[1],
- Mountain plover (*Charadrius montanus*),
- White-faced ibis (*Plegadis chihi*),
- Vermilion flycatcher (*Pyrocephalus rubinus*), and
- Western burrowing owl (*Athene cunicularia hypugaea*).

Similarly, the Certified EIR recorded western burrowing owls and western yellow bat within one (1) mile of the SPA. The SPA was not found to contain suitable habitat to support the western yellow bat due to the lack of roosting habitat.

A small, depressed area, was found at the SPA's northeastern boundary near the southwest corner of McCabe Road and Dogwood Road. The Certified EIR found this feature was dominated by cattails (*Typha* sp.) and exhibited evidence of ponding water. This potential Waters of the U.S. were not formally delineated nor verified by the U.S. Army Corps of Engineers (ACOE) and ACOE jurisdiction was not determined.

The Certified EIR found that implementation of the McCabe Ranch II Specific Plan could result in the following impacts which could be potentially significant:

- The loss of populations or habitat for the Colorado River toad (California Species of Special Concern);
- The loss of populations or essential habitat for special-status avian species including the mountain plover, white-faced ibis, and vermillion flycatcher (California Species of Special Concern);
- The loss of populations or essential habitat for the western burrowing owl (California Species of Special Concern in 2010 and now currently petitioned for listing as threatened or endangered pursuant to the CESA in 2025); and

[1] Presumed to be extirpated from California (County of Imperial, 2010).

- The loss of jurisdictional waters of the U.S., including wetlands.

The Certified EIR determined that implementation of mitigation measures MM 4.4.1, MM 4.4.2, MM 4.4.3a through e, and MM 4.4.4 would reduce direct, indirect and cumulative impacts to biological resources to below a level of significance.

4.3.3 Environmental Setting

4.3.3.1 Regional Setting

Imperial County contains a broad range of biotic communities with the cultivated/ruderal plant community being the most predominant. This plant community consists of cropland, pasture land, and orchards. Approximately 20 percent of land is irrigated for agricultural purposes, most notably the central area known as Imperial Valley (Imperial County, 1996). The valley floor historically consisted of a creosote scrub plant community but was replaced by agricultural activity after 1900. The dominant crops now being cultivated in the valley include cotton, chard, lettuce, and alfalfa.

Most of the Imperial Valley is nearly level dry lake bed. Fluvial erosion and deposition and eolian deflation and deposition are the main geomorphic processes (USDA, 1997). All drainage is toward the Salton Sea, which is located about 30 miles north of the study area. The Alamo and New Rivers are the main channels through which the Colorado River historically overflowed into the Salton Basin.

4.3.3.2 Biological Study Area

The BSA consists of the proposed McCabe Ranch II TM 994, an approximately 351.2-acre portion of the 468-acre McCabe Ranch II Specific Plan Area, plus a 500-foot buffer around the perimeter of TM 994. The BSA is generally located north of the Community of Heber and south of the City of El Centro, in the County of Imperial, California (**Figure 4.3-1, Biological Study Area**). The BSA is bounded by West McCabe Road on the north, Dogwood Road on the east, State Route 86 (SR-86) on the west, and the western extension of Correll Road on the south. The BSA is located in Section 20, Range 14 East, Township 16 South within the U.S. Geological Survey (USGS) Heber, California 7.5-minute topographic quadrangle. No open space, mitigation or conservation lands occur within or adjacent to the BSA.

4.3.3.3 Vegetation Communities

Field surveys were conducted in April, May and June 2024. Vegetation within and immediately surrounding the study area consists primarily of agriculture and urban communities (Figure 4.3-2). These communities are described below. Due to the developed nature of the BSA and surrounding vicinity, native vegetation communities and naturally-occurring habitats are not found (Barrett Biological, Appendix C). A list of plant and animal species observed during the field surveys is

provided as Appendix C of the Biology Report (Appendix C). The survey identified the presence of sparse riparian vegetation (cattails and phragmites) on site in the area of Date Drain 3.

Agriculture

Agricultural areas occur on a variety of land types throughout California. This is the primary biotic community throughout the study area. For the purposes of this community description, the agricultural biological community includes field and vegetable crops. Presently, crops grown in the study area include Bermuda grass (*Cynodon dactylon*), alfalfa, hay and various vegetables. Typically, agricultural fields in California are monotypic; however, some ruderal (weedy) vegetation can be found along roadsides, at field edges, and between rows.

Typically, agricultural lands can transition into any community or habitat type. In the study area, agricultural lands are associated with urban areas. Transitions between habitats are generally abrupt, marking the edge of cultivated areas. Because of their high degree of disturbance, agricultural areas generally have a low habitat value for wildlife, although a number of species adapted for disturbed conditions can utilize these areas. Field crops and pastures can provide food and cover for squirrels, numerous birds, raccoons (*Procyon lotor*), ring-necked pheasant (*Phasianus colchicus*), American crows (*Corvus brachyrhynchos*), coyotes (*Canis latrans*), and striped skunk (*Mephitis mephitis*). Seasonally flooded pastures and fields can provide important habitat for migratory waterfowl.

Urban

This community typically includes residential and commercial landscaping materials. Lawns, shrubs, and trees of various size, density, and arrangement are found adjacent to the study area. A distinguishing characteristic of urban habitats is the mixture of native and exotic plant species. Also included in the urban designation are ruderal communities that occur in areas of disturbance such as along roadsides and sidewalks. These communities are subjected to ongoing or past disturbances (e.g., vehicle activities and mowing). Areas of disturbance that are recolonized by invasive, non-native forb species are typically referred to as ruderal. Ruderal habitat in these disturbed areas supports a diverse weedy flora.

4.3.3.4 Jurisdictional Waters

The IID's Dogwood (Lateral) Canal and the Date Drain No. 3 traverse the Specific Plan Area in a north-south direction. The Date Drain No. 3-A is located along the southernmost boundary of the SPA and runs in an east-west direction. These features do not meet the criteria for wetlands or waters of the U.S. (WOUS) by the U.S. Army Corps of Engineers (USACE) or for wetlands or waters of the state (WOS) by CDFW; the habitat should not be considered jurisdictional by either agency (**Figure 4.3-3, Biological Features**). There are no blue line waterways on the map (Quadrangle Map: Heber) (Appendix C). Dogwood Lateral 2 runs north to south through the Project area. This water body would be considered jurisdictional by CDFW. Since all wastewater

will be contained on site the Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES) under the Porter-Cologne Water Quality Control Act would not be invoked. Date Drain 3 and the Dogwood Lateral 2 are operated by the IID.

The Certified EIR identified a small depressional area located at the northeastern study area boundary along McCabe Road that was dominated by cattails (*Typha* sp.) and exhibited evidence of ponding water. The Certified EIR noted that this feature was not formally delineated nor verified by the USACE as a wetland. Further, its presence was not identified during the 2024 biological survey (Appendix C).

4.3.3.5 Sensitive Plant Species

The Project site is currently in agricultural production. The *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018) state that it is appropriate to conduct a botanical field survey when:

- Natural (or naturalized) vegetation occurs in an area that may be directly or indirectly affected by a project (project area), and it is unknown whether or not special status plants or sensitive natural communities occur in the project area.

Appendix A of the Biology Report contains a detailed CNDDB/California Native Plant List (CNPS) list of species known from the vicinity of the Project area. These species were evaluated to determine if they could potentially occur within the BSA. No natural or naturalized vegetation occurs in this agriculture culture. This property has been dedicated to agricultural and urban uses for decades (over 50 years), thus, eliminating any native species through practices which include use of agriculture equipment and practices such as discing, plows, harrows, levelers, tractors, pesticide applications, harvesting activities. Therefore, no special status native plant population surveys would be needed.

4.3.3.6 Sensitive Wildlife Species

The following special status wildlife species were identified as potentially occurring in the Certified EIR:

- California river toad;
- Mountain plover;
- White-faced ibis;
- Vermillion flycatcher; and
- Western burrowing owl.

Of these, only the western burrowing owl was determined to occur or have the potential to occur during the 2024 biological survey. Mountain plover, white-faced ibis and vermillion flycatcher

could occasionally forage dependent upon crops planted and irrigation schedules. **Table 4.3-2** lists the special status wildlife species with potential to occur on site from the 2024 survey (Appendix C).

TABLE 4.3-2. SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR IN THE PROJECCT AREA

Species Common Name (*Scientific Name*)	Status		Found	Potential for Occurrence
	Federal	State		
Western burrowing owl (*Athene cunicularia*)	None	SC [(a)]	Yes	Four protocol surveys were performed. Individual burrowing owls and occupied burrows were found onsite and on the IID ROW between McCabe Road and Correll Road.
Flat-tailed horned lizard (*Phrynosoma mcallii*)	None	SC	No	The Project site is a highly disturbed agricultural area. No loose, sandy soil occurs on site. No flat-tailed horned lizard, scat or tracks were identified in the general biological survey. This area is not within a flat-tailed horned lizard Management Area. Not expected to occur. Very low potential.
Northern Harrier (*Circus cyaneus*)	None	SC	No	Sparse populations of prey observed; could be found hunting in area but not nesting. Project site has no habitat for this bird; the area is fields, not wetlands. Not observed and potential to occur on site is very low.
Loggerhead shrike (*Lanius ludovicianus*)	BCC	SC	No	The Project site is highly disturbed acreage with sparse available nesting opportunities. Lizards which are prey were not seen. Not observed and potential to occur on site is very low.
Yuma clapper rail (Ridgeway Rail) (*Rallus longirostris yumanensis*)	FE	ST	No	Species was not observed or heard; cattails /phragmites not found in dense stands. Not expected to occur.

Source: Barrett Biological, 2025.

(a) Petitioned for listing as threatened or endangered pursuant to the CESA.

1 FE = Federal endangered; BCC = Birds of Conservation Concern
SE = State endangered; ST = State threatened; SC = California species of special concern.

2 Potential for occurrence ranking is based on the following criteria:

High = Recent or historical record of the species occurring within the Project sites or within 1 mile of the Project sites and/or the habitat requirements for the species occur within Project site

Moderate = either a recent or historical record exists of the species within 1 mile of the Project sites or the habitat requirements for the species occur within the Project site

Low = No recent or historical records exist of species occurring within the Project sites or within 1 mile of Project site, and/or the habitats needed to support the species on the site are of poor quality.

Western Burrowing Owl – SC - Petitioned for listing as Protected Species under CESA.

Burrowing owl (Athene cunicularia), also called western burrowing owl, is a CDFW Species of Special Concern that occupies open areas of the desert and high desert and is frequently encountered in Imperial County. This small owl occurs in a wide range of mostly open habitats in California, including grasslands, shrub-steppe, deserts, pastures, and agricultural areas. The California Fish and Game Commission approved naming the western burrowing owl (Athene cunicularia hypugaea) as a candidate for potential listing as a protected species pursuant to CESA

in October 2024. CDFW's report indicating whether the further protection is warranted is due on or by October 25, 2025 (CDFW, 2025).

The location of burrowing owls, as well as active and occupied burrows found within or near the BSA during the four (4) protocol level burrowing owl surveys conducted in 2024 are presented on **Figure 4.3-3**. During the surveys a total of four (4) adult BUOWs, three (3) occupied burrows and three (3) active burrows were found.

- Burrow #1 was found on-site within the Phase 1B development area;
- Burrow #2 was found on-site within the Phase 2A development area, along the Date Drain No. 3;
- Burrow #3 was also found on-site within the Phase 2A development area, along the Date Drain No. 3; and,
- Burrow #4 was found on-site within Phase 1B development area between the Date Drain 3 and Dogwood Lateral 2.

Several depressions and erosions were also found along the IID ROW that could possibly be utilized as a burrow. Nesting activities observed included BUOW pairing; decorations around burrow; vocalization; and occasional bobbing. Appendix D of the Biology Report (Appendix C) discusses the results of the protocol level burrowing owl surveys in greater detail.

Flat-tailed Horned Lizard - SC

This species is restricted to areas of fine sand and sparse vegetation in desert washes and desert flats in central Riverside, eastern San Diego and Imperial counties. Its elevational range extends from below sea level to about 180 meters (600 feet). It is probably most abundant in areas of creosote bush and is found in desert scrub, wash, succulent shrub, and alkalai scrub habitats. The present range and abundance in that range has been greatly reduced over recent times by human activities such as development and recreational use of prime habitat (CDFW, 2000). The Project site is a highly disturbed agricultural area and the flat-tailed Horned lizard's potential to occur within the area is very low.

Northern Harrier - SC

This species occurs from annual grasslands up to lodgepole pine and alpine meadow habitats, as high as 3,000 meters (10,000 feet). It breeds from sea level to 1,700 meters (0-5,700 feet) in the Central Valley and Sierra Nevada, and up to 800 meters (3,600 feet) in northeastern California. This species frequents meadows, grasslands, open rangelands, desert sinks, fresh and saltwater emergent wetlands; seldom found in wooded areas. It is a permanent resident of the northeastern plateau and coastal areas; a less common resident of the Central Valley. It is a widespread winter resident and migrant in suitable habitat. The California population has decreased in recent decades,

but can be locally abundant where suitable habitat remains free of disturbance, especially from intensive agriculture. The breeding population is much reduced, especially in the southern coastal district. The destruction of wetland habitat, native grassland, and moist meadows, and burning and plowing of nesting areas during early stages of breeding cycle, are major reasons for the decline (CDFW, n.d.). This species was not observed and its potential to occur in the area is very low.

Loggerhead Shrike - SC

The loggerhead shrike is a common resident and winter visitor in lowlands and foothills throughout California. It prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. The highest density occurs in open-canopied valley foothill hardwood, valley foothill hardwood-conifer, valley foothill riparian, pinyon-juniper, juniper, desert riparian, and Joshua tree habitats. In the Great Basin, from Inyo County north, the population declines markedly from November through March. It is rare on coastal slopes north of Mendocino County, occurring only in winter. This species occurs only rarely in heavily urbanized areas but often found in open cropland. It sometimes uses edges of denser habitats (CDFW, n.d.). This species was not observed and its potential to occur on Project site is very low.

Yuma Clapper Rail – FE, ST

Dense emergent freshwater marsh vegetation is the general habitat type utilized by breeding populations of the Yuma Clapper Rail. Other important features of suitable habitat include relatively shallow water depth, close proximity to the land-water interface, a surface mat of dead, fallen vegetation, and a supply of prey, such as crayfish, beetles, and snails (SJM 2000). This species was not observed or heard; and is not expected to occur.

4.3.3.7 Wildlife Movement

The ability for wildlife to freely move about an area and not become isolated is considered connectivity and is important to allow dispersal of a species to maintain exchange genetic characteristics; forage (food and water) and escape from predation. Drainages, which are a network of interconnected rivers, streams, and other water bodies that collect, channel, and convey water from higher elevations to lower points, generally serve as movement corridors because wildlife can move easily through these areas, and fresh water is available. Corridors also offer wildlife unobstructed terrain to forage in and for the dispersal of young individuals. There are no natural wildlife movement corridors within the BSA.

4.3.4 Regulatory Setting

4.3.4.1 Federal

Endangered Species Act

The federal Endangered Species Act of 1973 (ESA) provides a framework for the protection of plant and animal species that are at risk of becoming extinct. It is administered by the U.S. Fish and Wildlife Service (USFWS). Section 7 of the ESA requires each federal agency to consult with the USFWS about projects that may adversely affect species listed as threatened or endangered under the ESA ("listed species"). Habitat critical to these listed species may also be separately designated under the ESA.

The Section 7 consultation process requires each federal agency to prepare a "Biological Assessment" (BA) to determine if the project is likely to adversely affect listed species or designated critical habitat. In response, the USFWS prepares a "Biological Opinion" (BO) for listed species or a "Conference Opinion" (CO) for species proposed for listing, which states the USFWS position on whether the project would likely jeopardize the continued existence of the listed species or adversely modify designated critical habitat.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The MBTA is enforced by USFWS. This act prohibits the killing of any migratory birds. Any activity which contributes to unnatural migratory bird mortality could be prosecuted under this act. With few exceptions, most birds are considered migratory under this act.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c) prohibits anyone without a permit issued by the USFWS from "taking" bald and golden eagles including their parts, nests, or eggs. The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." For purposes of these guidelines, "disturb" means: "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

Federal Water Pollution Control Act (Clean Water Act)

The Clean Water Act (CWA) provides a structure for regulating discharges into the waters of the U.S. The Environmental Protection Agency (EPA) is given the authority to implement pollution control programs. Section 404 of the CWA regulates the discharge of dredged, excavated, or fill

material in wetlands, streams, rivers, and other U.S. waters. U.S. Army Corps of Engineers (USACE) is the federal agency authorized to issue 404 Permits for certain activities conducted in wetlands or other U.S. waters. Section 401 of the CWA grants each state the right to ensure that the State's interests are protected on any federally permitted activity occurring in or adjacent to Waters of the State. In California, the Regional Water Quality Control Boards (RWQCB) are the agency mandated to ensure protection of the State's waters. For a Preferred Action that requires an USACE CWA 404 permit and has the potential to impact Waters of the State, the RWQCB will regulate the project and associated activities through a Water Quality Certification determination.

4.3.4.2 State

California Endangered Species Act

The California Endangered Species Act of 1984 (CESA) provides a framework for the listing and protection of wildlife species determined to be threatened or endangered in California.

California Fish and Game Code 3503.5

Raptors (birds of prey) and active raptor nests are protected by the California Fish & G. 3503.5. This code prohibits the "taking" of any birds of prey or their nests or eggs unless authorized.

California Fish and Game Code 3513

Protects California's migratory birds by making it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame birds.

California Fish and Game Code, Section 1600, as amended

Under Section 1602 of the Fish & G. Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources. Section 1602 of the Fish & G. Code requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake or use materials from a streambed to notify the CDFW before beginning the project. If the CDFW determines that the project may adversely affect existing fish and wildlife resources within a CDFW-jurisdictional water, a Lake or Streambed Alteration Agreement (i.e., 1602 Permit) is required.

California Code, Fish and Game Code § 2081

CDFW may authorize the incidental take of listed species under CESA through issuance of an incidental take permit pursuant to Fish & G. Code, Section 2081, subdivisions (b) and (c).

These provisions of the code, coupled with CDFW's "CESA Implementing Regulations" (14 CCR 783.0 et seq.), authorize CDFW to issue an Incidental Take Permit for a project as proposed if all of the following conditions are met:

(1) The take is incidental to an otherwise lawful activity;

(2) The impacts of the taking are minimized and fully mitigated by measures that are roughly proportional in extent to the project-related impact to the species, maintain the applicant's objectives to the maximum extent possible and are capable of successful implementation. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation. For purposes of this section only, impacts of taking include all impacts on the species that result from any act that would cause the proposed taking;

(3) The applicant ensures adequate funding to implement the measures and for monitoring compliance with and effectiveness of those measures; and

(4) The issuance of the permit would not jeopardize the continued existence of the species.

Porter-Cologne Water Quality Control Act, as amended

The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the RWQCBs power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the federal CWA. Any person proposing to discharge waste into a water of the State must file a Report of Waste Discharge with the regional board that has jurisdiction over the area.

4.3.4.3 Local

County of Imperial General Plan

Relevant County of Imperial General Plan policies related to biological resources are provided below. **Table 4.3-3** summarizes the project's consistency with the County's General Plan policies.

While this EIR analyzes the project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Planning Commissioners and Board of Supervisors ultimately determine consistency with the General Plan.

TABLE 4.3-3: CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL & NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element (COSE) (a)		
COSE Goal 1: Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value. • **COSE Objective 1.1:** Encourage uses and activities that are compatible with the fragile desert environment and foster conservation. • **COSE Objective 1.4:** Ensure the conservation and management of the County's natural and cultural resources.	Yes	The proposed Project conserves environmental resources by avoiding, minimizing, and/or mitigating environmental impacts that may occur within the Project site and will comply with the Mitigation Monitoring and Reporting Program (MMRP) included in this EIR.
COSE Goal 2: The County will integrate programmatic strategies for the conservation of critical habitats to manage their integrity, function, productivity, and long-term viability. • **COSE Objective 2.1:** Designate critical habitats for Federally and State-listed species. • **COSE Objective 2.2:** Develop management programs, including preservation of habitat for flat-tailed horned lizard, desert pupfish, and burrowing owl. • **Objective 2.3:** Support investigation of long-term climate change effects on biological resources. • **COSE Objective 2.4:** Use the CEQA and NEPA process to identify, conserve and restore sensitive vegetation and wildlife resources. • **Objective 2.6:** Attempt to identify, reduce, and eliminate all forms of pollution; including air, noise, soil, and water.	Yes	A Biological Resources Assessment Report was prepared for the Project, which included a burrowing owl survey. No critical habitats for federally or state listed threatened or endangered species occur on-site and no off-site designated habitats would be affected by the Project. Focused biological surveys were conducted at the project site for burrowing owls, and a general reconnaissance of the site was conducted for special status species. The surveys were conducted in accordance with USFWS and CDFG regulations. Mitigation measures have been developed to reduce impacts to burrowing owls (see Biological Resources Assessment Report prepared by Barrett in 2025). The Biology Report concludes the only special status species that would be impacted would be the Western burrowing owl. Potential impacts to burrowing owls will be avoided by implementation of Mitigation Measures MM BIO-6 through MM BIO-9.

TABLE 4.3-3: CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL & NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
Biological Resource Conservation Policy: Provide a framework for the conservation and enhancement of natural and created open space which provides wildlife habitat values. **Program:** Projects within or in the vicinity of a Resource Area should be designed to minimize adverse impacts on the biological resources it was created to protect. **Program:** Protect riparian habitat and other types of wetlands from loss or modification by dedicating open space easements with adequate buffer zones, and by other means to avoid impacts from adjacent land uses. Road crossings or other disturbances of riparian habitat should be minimized and only allowed when alternatives have been considered and determined infeasible.	Yes	The Project has been designed to minimize impacts on biological resources. Mitigation measures have been identified that will reduce impacts to all biological resources that could not be avoided. Potential impacts to riparian habitat will be avoided by implementation of Mitigation Measure 4.3.7. Federally protected wetlands do not occur within the Project area and, therefore, would not be affected.
Open Space and Recreation Conservation Policy: The County shall participate in conducting detailed investigations into the significance, location, extent, and condition of natural resources in the County. **Program:** Allow only compatible land uses and consistent zoning adjacent to protected areas. **Program:** Notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat.	Yes	A Biology Report was prepared for the project. The CDFW has provided input on the project. The Project has been designed to minimize impacts on biological resources. Mitigation measures have been identified that will reduce impacts to all biological resources that could not be avoided reduce to below a level of significant.
Water Element (b)		
Protection of Surface Waters Policy: Preservation of riparian and ruderal habitats as important biological filters, and as breeding and foraging habitats for native and migratory birds and animals.	Yes	Any impacts to riparian habitats would be resolved through implementation of Mitigation Measure 4.3.7.

TABLE 4.3-3: CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL & NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
Water Element (b)		
Coordinated Water Management Policy: Encourage and provide inter-agency and inter-jurisdictional coordination and cooperation for the management and wise use of water resources for contact and noncontact recreation, groundwater recharge, hydroelectric energy production, and wildlife habitat as well as for domestic and irrigation use.	Yes	A Water Supply Assessment has been prepared and is included as Appendix F of the EIR.

Sources: (a) County of Imperial 1997 (b) County of Imperial 1997 and 2016

4.3.5 Thresholds of Significance

A project would be considered to have a significant impact if it would:

1. 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 CDFW or USFWS?
2. 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 CDFW or USFWS?
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
4. 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?
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Approach to Impact Assessment

Consistent with the requirements of CEQA and local regulations, the significance of potential impacts is evaluated through the application of the significance criteria described above. The objective of the biological resources analysis is to identify potential adverse effects and/or significant impacts on biological resources. Avoidance is the preferred approach for the management of biological resources; however, it is not always possible to completely avoid

impacts. If impacts can be avoided through project design, establishment of exclusion zones, or other means, then specific mitigation measures may be unnecessary. However, appropriate mitigation measures to avoid or minimize impacts are identified, as appropriate, including procedures to be followed if significant biological resources are discovered during construction.

The following discussion provides an overview of the direct, indirect, and operation impacts that are expected to occur with the development of the Project.

Direct and Indirect Impacts

The CEQA Guidelines define direct impacts as those impacts that result from the project and occur at the same time and place. These include but are not limited to the removal of vegetation, disturbance to wildlife from construction activities, or the crushing of burrows. Indirect impacts are caused by the project but can occur later in time or farther removed in distance while still reasonably foreseeable and related to the project. Indirect impacts can include the disruption of the native seed bank, the spread of invasive plant species, or changes to soil or hydrology that adversely effects native species overtime, and the disruption of prey base or increased predation through alterations of the physical landscape from project features (i.e., fencing, walls or light poles) that provide perch sites or shelter for predators. Indirect impacts may also include increased traffic and human disturbance.

Temporary Impacts

Temporary impacts are usually considered to be activities short in duration (i.e., 6 to 12 months) that do not result in a permanent land use conversion. These impacts include construction-phase ground disturbance activities, noise, human disturbance, vehicle traffic, and land or habitat changes that are subject to restoration at the completion of the project. The construction of each phase of the Project would require approximately two to four years to complete.

Permanent Impacts

Project impacts are generally considered permanent if they involve the conversion of land to a new use, such as with the construction of the waste disposal cells, diversion berms, etc. Therefore, permanent impacts for certain species may include the footprint of the Project area. Where this standard is applied specific language associated with each impact and a justification or rationale will be provided to support the conclusion. Permanent impacts that affect biological resources may also be associated with noise, dust generation or management actions such as weed abatement. These effects are described in more detail below under operational impacts.

4.3.6 Analysis of Project Impacts and Significance Determination

Impact 4.3-1: 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 CDFW or USFWS.

Previously Identified Level of Significance

The Certified EIR determined that the Project would have a potentially significant impact on special status species including the following:

Amphibians

- California River Toad, a California species of special concern.

Avian

- Western burrowing owl
- White-face ibis
- Vermillion flycatcher
- Mountain Plover

Mitigation Measure 4.4.1 from the Certified EIR, which requires pre-construction focused surveys for any construction that would occur during the toad's active period (March through July), was incorporated to reduce impacts to the California river toad to below a level of significance.

Mitigation Measure 4.4.2, which requires pre-construction surveys for nesting birds for local avian species (March 1 to August 31), would reduce the potential impacts to the white-faced ibis, vermillion flycatcher, and mountain plover to below a level of significance.

Additionally, the Certified EIR identified Mitigation Measures 4.4.3a through 4.4.3e, which prohibit disturbance of occupied burrowing owl burrows during the nesting season, require pre-construction surveys during the nesting season, requires the permanent protection of foraging habitat, and passive relocation of owls, to reduce the impacts to below a level of significance.

Proposed Project Impact Analysis

No changes in the location, size, or boundaries of the Specific Plan area have occurred since adoption of the Specific Plan in 2010. The proposed McCabe Ranch II TM 994 and Specific Plan Amendment would not result in changes to the location, size, or boundaries, or disturbance identified for the Specific Plan. Thus, implementation of the proposed Project would have potentially significant impacts to special status wildlife species identified in **Table 4.3-2** as well as Appendix C of the Biological Technical Report (Appendix C). These impacts would occur

during the construction phase of the Project when ground is being disturbed, and the Project is under construction.

The more recent biological survey and additional desk top research determined that habitat for the California River Toad is not present, and that the species itself has not been identified in Imperial County since the mid-1950s. Thus, the species is deemed extirpated from the County. Therefore, the Project would have no impact on the California River Toad and Mitigation Measure 4.4.1 is not carried forward. Additionally, Mitigation Measure 4.4.2 (Pre-Construction Nesting Bird Surveys) is replaced by Mitigation Measures BIO-1 through BIO-5 which would reduce impacts to white-faced ibis, vermillion flycatcher, and mountain plover to below a level of significance.

Implementation of the proposed Project would have potentially significant impacts to the Western burrowing owl, which has been petitioned for listing as threatened or endangered pursuant to the CESA[2] and is present on the Project site and within the buffer area of the BSA. The Certified EIR determined implementation of Mitigation Measure 4.4.3a through 4.4.3e would reduce impacts to below a level of significance. However, the *Staff Report on Burrowing Owl Mitigation* was published by CDFW in March 2012, which is after the release of the Certified EIR. This document outlines updated mitigation measures for impacts to the Western burrowing owl. Thus, Mitigation Measures 4.4.3a through e are replaced by Mitigation Measures BIO-2 and BIO-6 through BIO-9 which would reduce impacts to the Western burrowing owl to below a level of significance.

Indirect impacts could result from construction-related habitat loss and modification of adjacent habitats related to dust, noise, vibration, stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. Potential significant impacts and measures to reduce impacts to less than significant are presented below.

Impact 4.3-2: 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 CDFW or USFWS?

Previously Identified Level of Significance

The Certified EIR did not identify the presence of riparian habitat or other sensitive natural communities. Thus, there would be no impact.

[2] Pursuant to the provisions of Section 2074.2 of the California Fish and Game Code, the California Fish and Game Commission, at its October 9-10, 2024 meeting, accepted for consideration the petition submitted to list western burrowing owl (Athene cunicularia hypugaea) as threatened or endangered under the California Endangered Species Act (CESA).

Proposed Project Impact Analysis

The general biological survey identified the presence of sparse riparian vegetation (cattails and phragmites) on site in the area of Date Drain 3. Date Drain 3 is proposed for undergrounding which would result in the loss of riparian vegetation. This would be a potentially significant impact. Implementation of Mitigation measure MM BIO-10 would reduce this impact to below a level of significance.

Impact 4.3-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Previously Identified Level of Significance

The Certified EIR determined that the implementation of the proposed Project may result in the loss of jurisdictional waters of the U.S, including wetlands. This would be considered a potentially significant impact. However, implementation of mitigation measure MM 4.4.4, which requires a formal wetland delineation be performed and submitted to the USACE for verification. If the USACE determines that there are jurisdictional waters in the study area, the applicant shall ensure that the project will result in no-net-loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact.

Proposed Project Impact Analysis

No USACE jurisdictional wetlands or waters of the U.S. were identified on site; therefore, implementation of the Project would have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. There are no blue line washes found within the influence of the project in the Heber Quadrangle map. However, in the event wetlands or waters of the U.S. are identified. Implementation of Mitigation Measure 4.4.4 would reduce impacts to below a level of significance.

The most recent biological survey found that Dogwood Lateral 2 is considered jurisdictional by CDFW and the RWQCB under the Porter Cologne Act. Approximately 0.371 acres of CDFW/RWQCB Waters of the State would be permanently affected by the Project (**Table 4.3-4**). California Fish & G. Code Section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or

- Deposit debris, waste or other materials that could pass into any river, stream or lake.

Note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and water courses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify the Project that would eliminate or reduce harmful impacts to fish and wildlife resources. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (Public Resources Code Section 21065). Early consultation with CDFW is recommended since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. Implementation of mitigation measure MM BIO-11 would reduce this impact to below a level of significance.

TABLE 4.3-4 TEMPORARY AND PERMANENT IMPACTS TO JURISDICTIONAL WATERS

Agency	Temporary (acres)_	Permanent (acres)	TOTAL (acres)
CDFW	0	0.371	0.371
RWQCB	0	0.371	0.371
USACE	0	0	0

Notes: CDFW = California Dept. of Fish and Wildlife RWQCB = Regional Water Quality Control Board
USACE = United States Army Corps of Engineers

Impact 4.3-4: Would the project substantially interfere with the movement of 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?

Previously Identified Level of Significance

No wildlife corridors are present within the Project area, therefore, there would be no impact.

Proposed Project Impact Analysis

The proposed Project is in a predominately developed and agricultural community. The Project area is bisected by several agricultural laterals and drains and several improved dirt roads and because of these existing barriers, the Project will not interfere substantially with the currently restricted movement of any native resident or migratory fish or wildlife species or with established

native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Thus, the impact would be less than significant.

Impact 4.3-5: Would the project conflict with local policies or ordinances protecting biological resources?

Previously Identified Level of Significance

Compliance with local policies or ordinances protection biological resources was not evaluated as part of the Certified EIR.

Proposed Project Impact Analysis

The *Imperial County General Plan Open Space and Conservation Element* (Imperial County, 2016) contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. As noted above, implementation of the proposed Project has the potential to result in significant impacts to candidate, sensitive, or special status species. Such impacts could conflict with policies of the Open Space and Conservation Element and are considered potentially significant. Implementation of MM BIO-1 through MM BIO-11 would reduce these impacts to below a level of significance.

4.3.7 Mitigation Measures

4.3.7.1 Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

The Certified EIR recommended several measures to reduce impacts to biological resources. These measures are presented below, verbatim, and are numbered to match their numbering in the Certified EIR. ~~Strikeout~~ formatting is used to depict those previously approved mitigation measures that are no longer applicable to the proposed Project. Newly proposed/replacement mitigation measures are also listed below.

~~**MM 4.4.1 Pre-construction Surveys for Colorado River Toad**~~

~~For any project development within the McCabe Ranch II Specific Plan Area, if construction is to take place during the Colorado River toad's active period, March through July, pre-construction focused surveys shall be conducted by a qualified biologist to determine the presence/absence of this species within the study area. Surveys shall be conducted within appropriate habitats (ditches and canals that traverse the study area). Should the Colorado River toad be detected during surveys, CDFG shall be consulted regarding appropriate methods/techniques for relocation of the toads. The preferred mitigation for impacts to this special-status species is avoidance of habitat (canals and ditches). If it is not possible to completely avoid impacts to habitat, other measures may~~

include relocating the toads to a nearby suitable habitat area or establishing a buffer around suitable habitats within the study area. If establishing a buffer is chosen, the appropriate buffer size shall be determined during consultation with CDFG, but may be up to 50 feet from edge of bank.

Timing/Implementation: Prior to the initiation of construction activities that would occur during March through July..

Enforcement/Monitoring: ICPDSD.

MM 4.4.2 Pre-Construction Nesting Bird Surveys

If proposed construction activities are planned to occur within the McCabe Ranch II Specific Plan area during the nesting season for local avian species (typically March 1 through August 31), the applicant shall retain a qualified biologist to conduct a focused survey for active nests of special-status birds in the vicinity of the construction area no more than 30 days prior to ground disturbance. The focused survey shall be conducted no less than 100 feet outside project boundaries, where possible. If an active nest is located within the 100-foot survey area, CDFG shall be consulted and may place limitations on construction activities. Restrictions/limitations on construction activities may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 100 feet around the nest as confirmed by the appropriate resource agency) or alteration of the construction schedule to a period either prior to or following fledging of chicks. Fledgling typically occurs by July or August. Reference to this requirement and to the MBTA shall be included in the construction specifications.

Timing/Implementation: No more than 30 days prior to ground disturbance.

Enforcement/Monitoring: ICPDSD.

MM 4.4.3a Burrowing Owl Avoidance

Occupied western burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFG verifies through non-invasive methods that either: (1) the birds have not begun egg-laying and incubation; or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Timing/Implementation: During creation of construction agreements and prior to construction activities.

Enforcement/Monitoring: ICPDSD.

MM 4.4.3b Pre-construction Burrowing Owl Surveys

If required, any mitigation actions shall be carried out prior to the nesting season, from September 1 to January 31. In addition, pre-construction surveys of suitable habitat on the study area and 150-foot buffer zones shall be conducted within 30 prior to construction.

Timing/Implementation: September 1 to January 31; up to 30 days prior to construction.

Enforcement/Monitoring: Imperial County Planning and Development Services Department.

MM 4.4.3c Foraging Habitat Conservation

If avoidance is possible, then no disturbance of occupied burrows shall occur within 50 meters (approximately 160 feet) 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. Foraging habitat shall be permanently preserved contiguous with occupied burrow sites for each pair of breeding burrowing owls or single unpaired resident bird, or as approved by CDFG.

Timing/Implementation: September 1 to January 31; up to 30 days prior to construction.

Enforcement/Monitoring: ICPDSD.

MM 4.4.3d Foraging Habitat Permanent Protection

When destruction of occupied burrows is unavoidable, in order to offset the loss of foraging and burrow habitat, foraging habitat per pair or unpaired resident bird shall be permanently protected in a location and configuration acceptable to CDFG. New burrows shall be created at a ratio or 2:1 in the protected habitat, or as approved by CDFG.

Timing/Implementation: During creation of construction agreements and during construction activities.

Enforcement/Monitoring: Imperial County Planning and Development Services Department.

MM 4.4.3e Passive Relocation

If owls must be moved away from the disturbance area, passive relocation techniques shall be used. Passive relocation shall incorporate the following guidance, subject to approval by CDFG: Owls should be excluded from burrows in the immediate impact zone and within a 50-meter (approximately 160 feet) buffer 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 48 hours to ensure owls have left the burrow before excavation.

Timing/Implementation: Prior to the initiation of construction activities.

~~*Enforcement/Monitoring: Imperial County Planning and Development Services Department.*~~

MM 4.4.4 Formal Wetland Delineation

Should any future projects within the Phase 3B area of the McCabe Ranch II Specific Plan Area propose development of, or activities within, the potential wetland feature at the northeast end of the Plan area, a formal wetland delineation shall be performed and ~~be~~ submitted to the ACOE for verification. Prior to issuance of any permits, including clearing, grubbing, and grading permits for activities that would impact jurisdictional aquatic resources, the Project Applicant shall provide the County of Imperial with evidence that the ACOE has determined the water features are not jurisdictional, or that appropriate measures have been incorporated to offset losses to the satisfaction of ACOE staff. If the ACOE determines that the water features within the study area are not jurisdictional, no additional mitigation is required. If the ACOE determines that there are jurisdictional waters in the study area, the applicant shall ensure that the project will result in no-net-loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact. Compensatory mitigation may consist of: (a) obtaining credits from a mitigation bank; (b) making a payment to an in-lieu fee program that will conduct wetland, stream or other aquatic resource restoration, creation, enhancement, or preservation activities; these programs are generally administered by government agencies or nonprofit organizations that have established an agreement with the regulatory agencies to use in-lieu fee payments collected from permit applicants; and/or (c) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement and/or preservation activity. This last type of compensatory mitigation may be provided at or adjacent the impact site (i.e., onsite mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., offsite mitigation). The project proponent/permit applicant retains responsibility for the implementation and success of the mitigation project.

Timing/Implementation: Prior to the initiation of construction activities.

Enforcement/Monitoring: ICPDSD and the Army Corps of Engineers

4.3.7.2 Newly Proposed Mitigation

The following Mitigation Measures would replace Mitigation Measures 4.4.3a through e and reduce impacts to the western burrowing owl to below a level of significance.

MM BIO-1 Pre-Construction Nesting Bird Surveys

Construction activities for any development phase or development activity that would occur under TM 994 or the Specific Plan should commence outside of the peak bird breeding season (generally February 1 through August 31; January for raptors). Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than three (3) days prior to any project-related vegetation removal, site grading, or ground-disturbing activities in accordance with

the Migratory Bird Treaty Act and California Fish and Game Code sections 3503, 3503.5, and 3513. Qualified avian biologists are defined as individuals with demonstrated field expertise in ornithology, in particular, nesting behavior and nest detection. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts.

If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriately sized construction-avoidance buffer (i.e., nest buffer) around the nest to be marked on the ground using flagging or staking. Construction activities will not occur within a construction-avoidance buffer area until the nest is deemed inactive by a qualified biologist. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results.

The qualified avian biologist will physically delineate the no-work buffers in the field with flagging, fencing, or other appropriate barriers. and construction personnel shall be instructed on the sensitivity of nest areas. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist has determined whether the young have fledged or the nest is no longer active. Active nests and the adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined that the young have fledged or the project activity has been completed.

If an active nest is encountered during the Project construction, construction shall stop immediately until a qualified biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws. If occupied nests are found within the Project area or within 500 feet of the Project area, a qualified biologist shall limit construction activities to avoid impacting nests.

If migratory birds are not detected during the pre-construction survey, no further measures would be required, and construction activities may proceed.

Verification: Within 14 days prior to the nesting bird survey for any development phase or development activity that would occur under TM 994 or the Specific Plan, the names and credentials of the biologists conducting the survey shall be submitted to the ICPDSD for review and approval.

Reporting: Within 30 days of the completion of the monitoring efforts, the Project Applicant shall submit a Final Nesting Bird Survey Monitoring Report prepared by the qualified biologist to the ICPDSD and CDFW. The report shall include the time, date, and duration of the survey; identity and qualifications of the surveyor(s); list of species observed; results of the survey; and any designated buffer zones. The report(s) shall contain maps showing the location of all nests, species

nesting, status of the nest (e.g., incubation of eggs, feeding of young, near fledging); photographs of habitat areas during pre-construction, and other relevant summary information documenting that general compliance was achieved.

Timing/Implementation: *Up to14 days prior to construction; during construction; and within 30 days of completion of the monitoring efforts.*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-2 Implement a Worker Education and Awareness Program

The Project Applicant for any development phase or development activity that would occur under TM 994 or the Specific Plan, shall retain a qualified biologist to develop and implement a worker education and awareness program (WEAP) to educate on-site workers about each subsequent development activity's sensitive environmental issues. The qualified biologist can be the same as the biologist in MM BIO-1 or it can be an additional biologist.

A qualified biologist is an individual who holds a bachelor's degree from an accredited university and 1) is knowledgeable in relevant species' life histories and ecology, 2) can correctly identify relevant species, 3) has conducted field surveys for relevant species and biological resources found in or near the project area, 4) is familiar with relevant survey protocols, and 5) is knowledgeable of state and federal laws regarding the protection of sensitive species. OR has relevant education and experience that demonstrates the ability to carry out the tasks required of a qualified biologist . The resume(s) shall demonstrate to the satisfaction of the ICPDSD the appropriate education and experience to accomplish the assigned biological resources tasks.

The WEAP shall be presented by the qualified biologist or a designated biological monitor to all personnel prior to performing any work on-site, including but not limited to surveyors, engineers, inspectors, contractors, subcontractors, supervisors, employees, monitors, visitors, and delivery drivers. If the WEAP presentation is recorded on video, it may be presented by any competent project personnel.

The WEAP shall consist of a presentation from a qualified biologist or designated biological monitor with access to the qualified biologist that includes a brief discussion of the biology of the habitats and species identified as expected and/or present at the project site. The WEAP shall also include a brief discussion about the distribution and habitat needs of any protected species that may be present, legal protections for those species, penalties for violations, and Project specific protective measures included in this DEIR. Interpretation shall be provided for non-English- speaking workers, and the same instruction shall be provided for any new workers prior to their performing work on-site. The Permittee shall prepare and distribute wallet-sized cards or a fact sheet that contains this information for workers to carry on-site. Upon completion of the education program, employees shall sign a form stating they attended the education program and

understand all protection measures. These forms shall be filed at the worksite offices and be available to the ICPDSD and/or CDFW upon request. The education program shall be repeated annually for any part of the Project extending more than one (1) year. Copies of the education program materials shall be maintained at the Project site for workers to reference as needed.

Verification: At least 60 days prior to the start of ground-disturbing activities, Project Applicants for any development phase or development activity that would occur under TM 994 or the Specific Plan shall submit the WEAP presentation and associated materials to the ICPDSD and CDFW for review and approval.

Timing/Implementation: *Pre-construction and Construction Phases*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-3 Invasive Species Education Program

Project applicants shall include a brief invasive species education program for all persons working on the Project prior to the performing any work on-site. The education program shall consist of a presentation from a qualified biologist or designated biological monitor with access to the qualified biologist that includes a brief discussion of the invasive species currently present within the Project site as well as those that may pose a threat to or have the potential to invade the Project site. The brief discussion shall include a physical description of each species and information regarding their habitat preferences, local and statewide distribution, modes of dispersal, and impacts. The education program shall also include a brief discussion of BMPs to be implemented at the Project site to avoid the introduction and spread of invasive species into and out of the Project site. Note: the WEAP presentation shall not exceed 15-20 minutes.

The qualified biologist should be consulted immediately if a dead or injured bird is found on site.

Timing/Implementation: *Prior to the initiation of construction activities.*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-4 Artificial Nighttime Lighting

During construction of all phases of the Project and operations during the lifetime of the Project, the County shall ensure that the Project eliminates all nonessential lighting throughout the Project area and avoids or limits the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. The County shall ensure that all lighting for Project is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). The County shall ensure the use of LED

lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.

Timing/Implementation: *During the design phase.*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department.*

MM BIO-5 Indirect Noise Impacts

During construction of any development phase, development activity or infrastructure improvement that would occur under TM 994 or the Specific Plan, the County shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro hydroelectric systems, or small wind turbine systems. The County shall ensure use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means should be below the 55-60 dB range within 50-feet of the source.

Timing/Implementation: *During the design phase.*

Enforcement/Monitoring: *ICPDSD.*

MM BIO-6 Pre-Construction Surveys for Burrowing Owl

A qualified biologist will complete an initial take avoidance survey 14 day**s** prior to ground disturbance activities and within 24 hours prior to ground disturbance activities using the recommended methods described in the Detection Surveys found in the *Staff Report on Burrowing Owl Mitigation, California Department of Fish and Game* (CDFG 2012 or the most recent version). Prior to the initiation of construction activities (i.e., grading, grubbing, clearing, staging, digging), focused burrowing owl surveys shall be conducted by a qualified biologist according to the CDFW Staff Report on Burrowing Owl Mitigation, *California Department of Fish and Game* (CDFG, 2012 or most recent version) for each development area and surrounding 500 ft radius. If work is stopped for longer than 30 days, the area will be resurveyed prior to restarting construction.

Take avoidance surveys shall be conducted no less than 14 days prior to the start of project-related activities. Burrowing owls may re-colonize a site after only a few days. Time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to initiating ground disturbance in accordance with the Staff Report on Burrowing Owl Mitigation, *California Department of Fish and Game* (CDFG 2012 or the most recent version).

If the surveys confirm the presence of burrowing owls, active burrows or signs thereof, project activities shall be immediately halted. If impacts to occupied burrowing owl habitat or burrows

cannot be fully avoided, consultation with CDFW is warranted to discuss acquiring an Incidental take Permit (ITP) prior to any ground disturbing activities, pursuant Fish and Game Code Section 2081 subdivision (b). Full mitigation often involves the permanent conservation of quality habitat benefiting the species through a conservation easement, along with habitat enhancement and ongoing management funded appropriately. Passive relocation, performed according to the Staff Report on Burrowing Owl Mitigation (CDFG, 2012) may be authorized through the ITP as a minimization measure.

If burrowing owl(s) are not detected, construction may proceed.

Timing/Implementation: *14 days prior to ground disturbance activities and within 24 hours prior to ground disturbance activities.*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-7 Implementation of Burrowing Owl Avoidance and Minimization Measures (Burrowing Owl Plan)

Implementation of burrowing owl avoidance and mitigation measures would be triggered by positive owl presence on the site where project activities will occur. The development of avoidance and minimization approaches would be informed by monitoring the burrowing owls prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused take avoidance preconstruction surveys, the qualified biologist and Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities.

The Burrowing Owl Plan shall describe proposed avoidance, monitoring, passive relocation, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat consistent with the "Mitigation Impacts" section of the *Staff Report on Burrowing Owl Mitigation, California Department of Fish and Game* (CDFW 2012) and shall implement CDFW approved mitigation prior to initiation of Project activities.

If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby,

details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan.

MM BIO-8 Passive Relocation of Burrowing Owls

If occupied burrows are found on site, and if necessary, the burrows shall be passively relocated by a qualified biologist outside of nesting season and an appropriate number of artificial burrows shall be installed if no acceptable natural burrows are found adjacent to Project site. If possible, these burrows shall be installed as close as possible to the passively relocated burrows. A Burrowing Owl Plan should be prepared to address activities and conservation efforts and submitted to CDFW.

Timing/Implementation: *Within two to three weeks of the initiation of construction activities.*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-9 Shelter in Place

If occupied burrows are found but are not in the active construction areas, the occupied burrows can be sheltered in place with appropriate materials under the supervision of a qualified biologist and accordance with the approved Burrowing Owl Plan. If occupied burrows are sheltered, a biological monitor shall monitor areas of active construction; schedule to be determined by qualified biologist. This biologist will ensure that the project complies with these mitigation measures and, after consultation with CDFW, will have the authority to halt activities if they are not in compliance. The biologist will inspect the construction areas periodically for the presence of BUOWs.

Timing/Implementation: *Prior to the initiation of construction activities or staging of equipment.*

Enforcement/Monitoring: *ICPDSD and CDFW.*

MM BIO-10 Riparian Habitat Mitigation

Loss of riparian habitat associated with undergrounding the IID canal can be mitigated by reaching out to support the IID Wetlands Mitigation Project or the New River/Alamo Wetlands projects with plant purchases.

Timing/Implementation: *Based on negotiations during planning and construction to conclude prior to completion of project.*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department and CDFW.*

MM BIO-11 Section 1602 Lake and Streambed Alteration Agreement

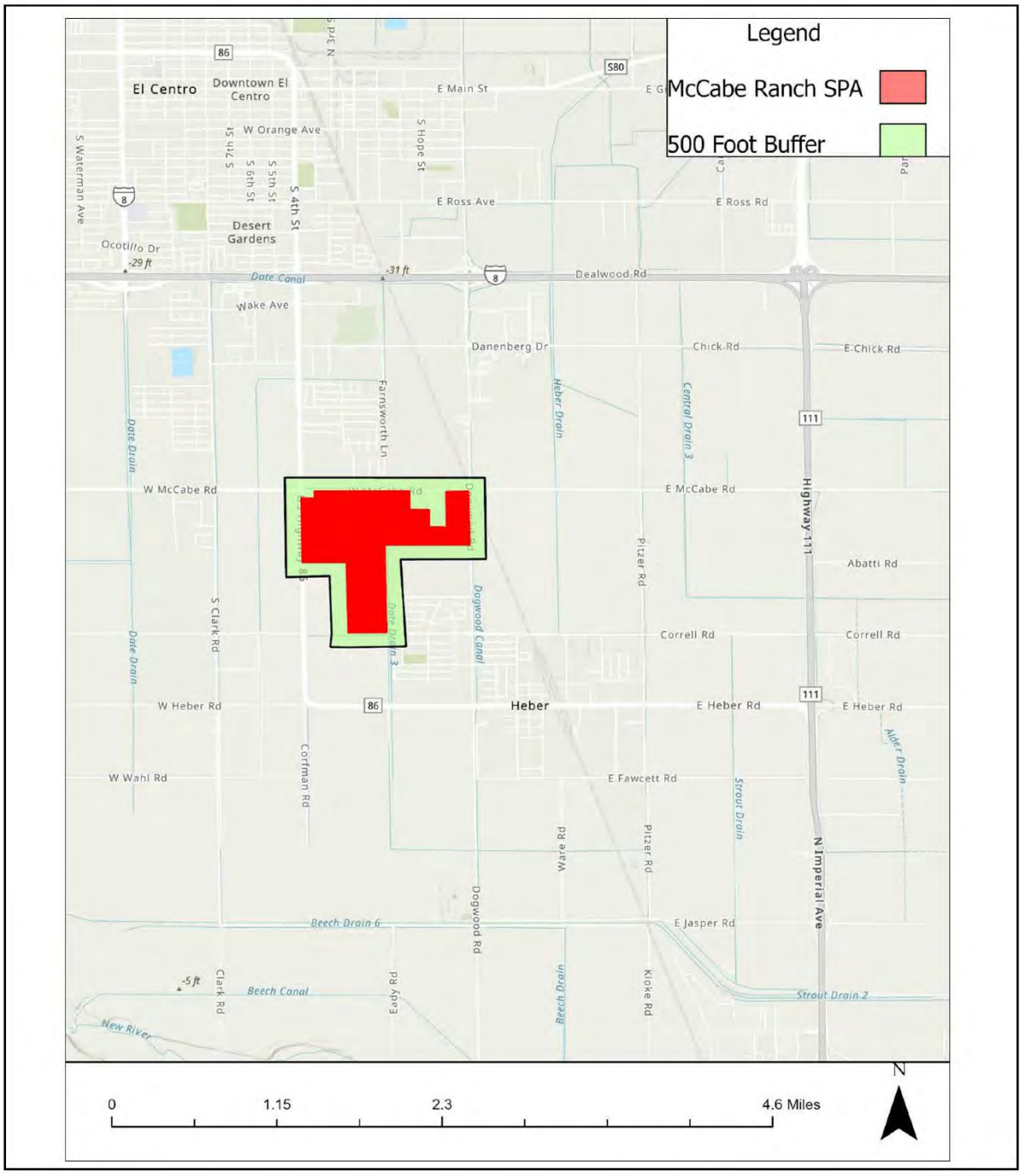
Prior to Project-activities and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the CDFW stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Timing/Implementation: *Prior to the initiation of construction activities and issuance of any grading permit.*

Enforcement/Monitoring: *Imperial County Planning and Development Services Department and CDFW.*

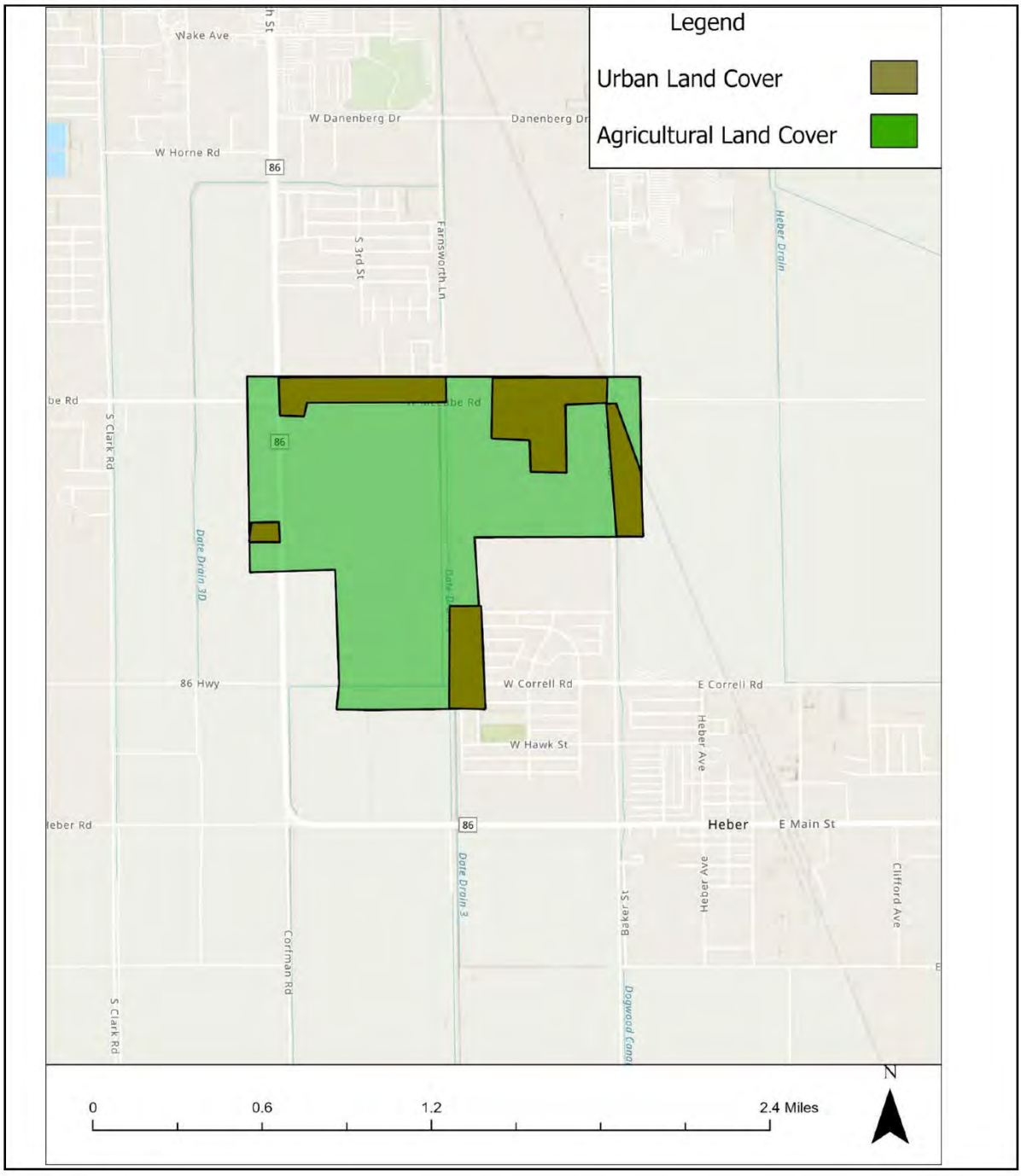
4.3.8 Level of Significance After Mitigation

The Project will have less than significant impacts after implementation of Mitigation Measures MM 4.4.4 and MM BIO-1 through MM BIO-11M because these measures require the performance of professionally accepted and legally compliant procedures for the avoidance; preservation and/or and restoration; and monitoring of sensitive biological resources.



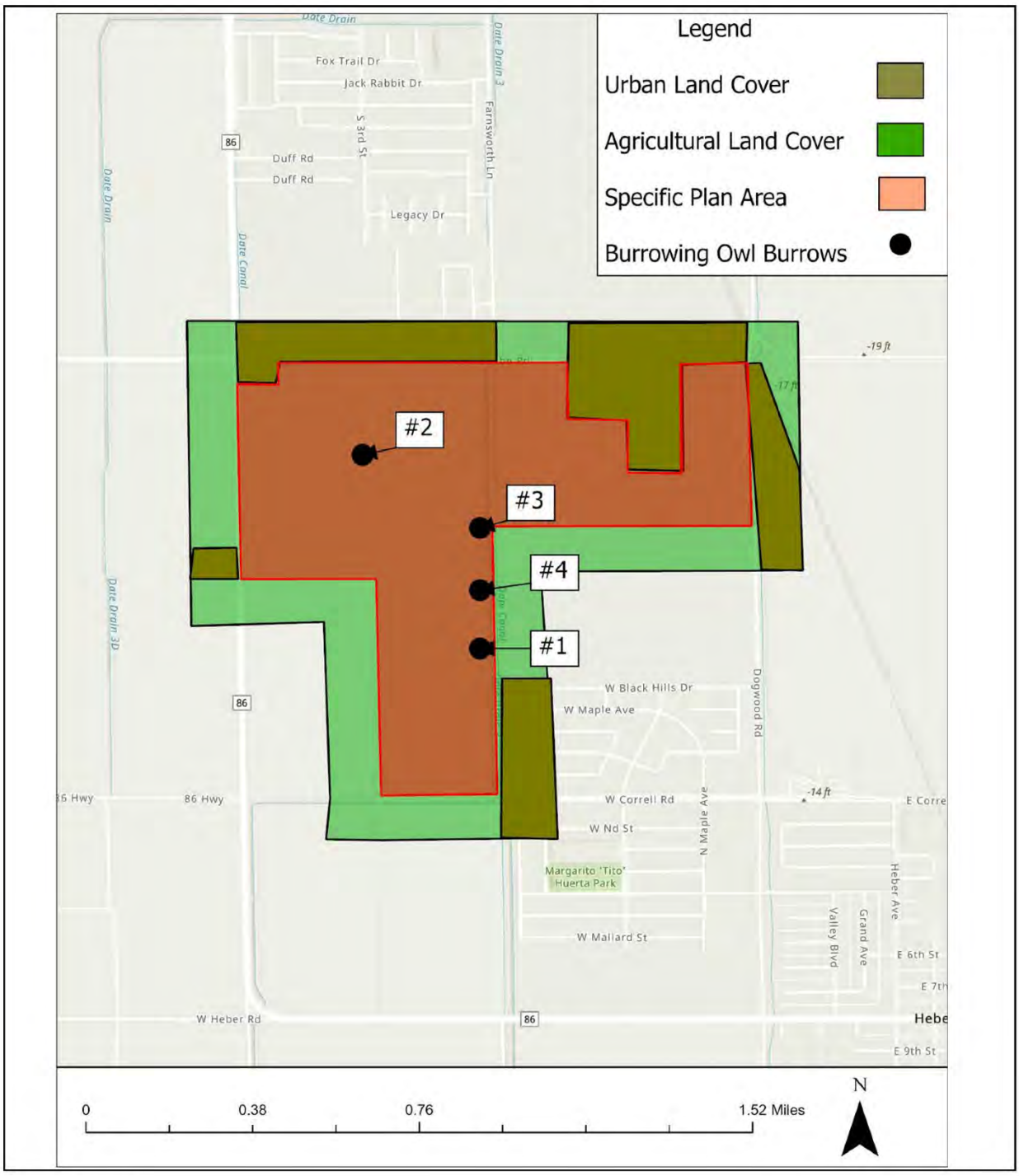
Source: ESRI, 2024

Biological Study Area
McCabe Ranch II Tract Map 994 and SPA
Figure 4.3-1



Source: ESRI, 2024

Land Cover Type
McCabe Ranch II Tract Map 994 and SPA
Figure 4.3-2



Source: ESRI, 2024

Biological Resources
McCabe Ranch II Tract Map 994 and SPA
Figure 4.3-3

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4.4. Energy

4.4.1 Introduction

This section provides the supplemental analysis required to assess the proposed McCabe Ranch II TM 994 and Specific Plan Amendment's potential use of energy, including electricity, natural gas and gasoline, and diesel fuels.

The following discussion identifies existing energy use patterns and examines whether the proposed Project (including development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner. The analysis is this section is based on the *Energy Calculation Memorandum for the McCabe Ranch II Specific Plan Project*, prepared by Birdseye Planning Group, February 2025 (BPG, 2025b; Appendix D).

Please refer to Section 4.6, Greenhouse Gas Emissions, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 4.11, Utilities and Service Systems, for a discussion of the Project's water demands.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from agencies and the public. No comments related to energy systems were received.

4.4.2 Summary of Certified EIR Findings

While the McCabe Ranch II Specific Plan's Resource Management Plan identified various design features and measures to encourage the conservation of energy resources, this topic was not addressed in the Certified EIR.

4.4.3 Environmental Setting

The Project site is located within the Imperial Valley area in the south-central part of Imperial Count. The Imperial Valley and is bound by Mexico on the south, the Algodones Sand Hills on the east, the Salton Sea on the north and San Diego County on the northwest, and the alluvial fans bordering the Coyote Mountains and the Yuha Desert to the southwest. The Imperial Irrigation District (IID) supplies electricity to most users in the Imperial Valley and natural gas services are provided by the Southern California Gas Company.

4.4.4 Regulatory Setting

Energy conservation is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the U.S. Environmental Protection Agency's [USEPA] EnergyStar™ program) and transportation (e.g., fuel efficiency standards). At

the state level, Title 24 of the California Code of Regulations (CCR) sets forth energy standards for buildings. Further, the State provides rebates/tax credits for installation of renewable energy systems and offers the Flex Your Power program which promotes conservation in multiple areas. At the local level, individual cities and counties establish policies in their general plans and climate action plans related to the energy efficiency of new development and land use planning and to the use of renewable energy sources.

4.4.4.1. Federal

Energy Policy and Conservation Act, and CAFE Standards

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration (NHTSA), part of the U.S. Department of Transportation (DOT), is responsible for revising existing fuel economy standards and establishing new vehicle economy standards.

The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Compliance with the CAFE standards is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the country. The USEPA calculates a CAFE value for each manufacturer based on the city and highway fuel economy test results and vehicle sales. The CAFE values are a weighted harmonic average of the USEPA city and highway fuel economy test results. Based on information generated under the CAFE program, the DOT is authorized to assess penalties for noncompliance. Under the Energy Independence and Security Act of 2007 (described below), the CAFE standards were revised for the first time in 30 years.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. The EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The EPAct provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the EPAct in setting out a comprehensive national energy strategy for the 21st century.

4.4.4.2. State

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission (CPUC) regulates privately-owned utilities in the energy, rail, telecommunications, and water fields.

State of California Energy Action Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 2003 California Energy Action Plan (2008 update). The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs; and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030,

significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). Further, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports, Governor Davis directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand levels by 2020.

Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to: "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety" (Public Resources Code [PRC] Section 25301(a)). This work culminated in the Integrated Energy Policy Report (IEPR).

CEC adopts an IEPR every two years and an update every other year. The 2017 IEPR is the most recent IEPR, which was adopted March 16, 2018. The 2017 IEPR provides a summary of priority energy issues currently facing the State, outlining strategies and recommendations to further the State's goal of ensuring reliable, affordable, and environmentally responsible energy sources. Energy topics covered in the report include progress toward statewide renewable energy targets and issues facing future renewable development; efforts to increase energy efficiency in existing and new buildings; progress by utilities in achieving energy efficiency targets and potential; improving coordination among the State's energy agencies; streamlining power plant licensing processes; results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand; future energy infrastructure needs; the need for research and development efforts to statewide energy policies; and issues facing California's nuclear power plants.

Senate Bill 1078: California Renewables Portfolio Standard Program

SB 1078 (Chapter 516, Statutes of 2002) establishes a renewable portfolio standard (RPS) for electricity supply. The RPS requires that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide 20 percent of their supply from renewable sources by 2017. This target date was moved forward by SB 1078 to require compliance by 2010. In addition, electricity providers subject to the RPS must increase their renewable share by at least one (1) percent each year. The outcome of this legislation will impact regional transportation powered by electricity. As of 2016, the State has reported that 21 percent of electricity is sourced from certified renewable sources (see Section 5.6.2, "Environmental Setting").

Senate Bill X1-2: California Renewable Energy Resources Act

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

Senate Bill 100: California Renewables Portfolio Standard Program

SB 100 requires that all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Energy Action Plan

The first Energy Action Plan (EAP) emerged in 2003 from a crisis atmosphere in California's energy markets. The State's three major energy policy agencies (CEC, CPUC, and the Consumer Power and Conservation Financing Authority [established under deregulation and now defunct]) came together to develop one high-level, coherent approach to meeting California's electricity and natural gas needs. It was the first time that energy policy agencies formally collaborated to define a common vision and set of strategies to address California's future energy needs and emphasize the importance of the impacts of energy policy on the California environment.

In the October 2005 Energy Action Plan II, CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues and research and development activities. The CEC recently adopted an update to the EAP II in February 2008 that

supplements the earlier EAPs and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. The CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. In 2016, the CEC updated the California Energy Code again, effective January 1, 2017. The CEC estimates that the 2016 California Energy Code is 28 percent more efficient than 2013 California Energy Code for residential construction and is 5 percent more efficient for non-residential construction.

The 2019 California Energy Code was adopted by CEC on May 9, 2018, and will apply to projects constructed after January 1, 2020. The 2019 California Energy Code is designed to move the State closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)4). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency standards will result in a 53 percent reduction in new residential construction as compared to the 2016 California Energy Code. Non-residential buildings are anticipated to reduce energy consumption by 30 percent as compared to the 2016 California Energy Code primarily through prescriptive requirements for high-efficiency lighting (CEC 2018). The California Energy Code is enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

Assembly Bill 32, Senate Bill 32, and Climate Change Scoping Plan and Update

In December 2008, the CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons (MMT) of carbon dioxide-equivalent (CO_2e) emissions, or approximately 21.7 percent from the State's projected 2020 emission level of 545 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 47 MMT CO_2e, or almost 10 percent, from 2008 emissions). In May 2014, the CARB released and has since adopted the First Update to the Climate Change Scoping Plan to identify the next steps in reaching AB 32 goals and evaluate progress that has been made between 2000 and 2012 (CARB 2014). According to the update, California is on track to meet the near-term 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020 (CARB 2014). The update also reports the trends in GHG emissions from various emissions sectors (e.g., transportation, building energy, agriculture).

In August 2016, Governor Brown signed SB 32 and AB 197, which serve to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by Executive Order (EO) B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050. Achievement of these goals will have the co-benefit of reducing California's dependency of fossil fuels and making land use development and transportation systems more energy efficient.

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by CARB, outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). In 2015, electricity generation accounted for 11 percent of the State's GHG emissions. California plans to significantly reduce GHG emissions from the energy through the development of renewable electricity generation in the form of solar, wind, geothermal, hydraulic, and biomass generation. The State is on target meet the SB X1-2-33 percent renewable energy target by 2020 and will continue to increase statewide renewable energy to 50 percent by 2030, as directed by SB 350. Additionally, the State will further its climate goals through improving the energy efficiency of residential and non-residential buildings by continual updates (i.e., every 3 years) to the California Energy Code, which contains mandatory and prescriptive energy efficiency standards for all new construction.

More details about the statewide GHG reduction goals and 2017 Scoping Plan measures are provided in the regulatory setting of Section 5.7, "Greenhouse Gas Emissions and Climate Change."

Senate Bill 375

SB 375, signed by the Governor in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocation in each MPO's Regional Transportation Plan. The CARB, in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035. Implementation of SB 375 will have the co-benefit of reducing California's dependency of fossil fuels and making land use development and transportation systems more energy efficient.

The Southern California Association of Governments (SCAG) serves as the MPO for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. The Project site is located within Imperial County. The SCAG adopted its 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy in 2020. The final recommended reduction targets established for SCAG are to achieve an 8 percent per-capita reduction compared to 2012 emissions from cars and trucks by 2020 and a 13 percent per-capita reduction by 2035.

Executive Order B-30-15

On April 20, 2015, Governor Edmund G. Brown Jr. signed EO B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32, discussed above). California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers

by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB, 2016).

4.4.4.3. Local

Southern California Association of Government's (SCAG) Connect SOCAL 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Imperial County General Plan

The purpose of the Imperial County General Plan is to guide growth throughout the County. Urban development is directed to areas where public infrastructure can be readily extended to areas with limited health and safety hazards. Likewise, development should avoid natural, cultural, and economic resources.

The General Plan includes ten elements: Land Use; Housing; Circulation and Scenic Highways; Noise; Seismic and Public Safety; Conservation and Open Space; Agricultural; Renewable Energy and Transmission; Water; Parks and Recreation. These elements satisfy the California Government Code requirements for general plan elements. Each element includes goals, objectives, and implementing policies and programs. It should be noted that the General Plan does not include any specific policies related to energy conservation. Relevant County of Imperial General Plan policies related to land use are provided below.

4.4.5 Thresholds of Significance

A project would be considered to have a significant impact if it would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.4.6 Analysis of Project Effects and Significance Determination

Impact 4.2-1 Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Project construction would utilize common methods for site preparation, grading and installation of all infrastructure. Techniques are not expected to be wasteful or otherwise result in inefficient use of fuels or other sources of energy. The proposed Project would be required to comply with California Energy Code Title 24 requirements in effect at the time buildings are being designed. A less than significant impact would occur.

Design standards incorporated into the Specific Plan, such as street sections with less pavement and more green space, along with other pedestrian friendly development techniques will foster conservation of energy resources. Additionally, future residential builders within the Plan area are encouraged to use energy efficient appliances and lighting in their homes and develop homes with efficient solar orientation. Future builders are also encouraged to make solar power options available to future buyers if market conditions make this option economically feasible.

Implementation of the following McCabe Ranch II Specific Plan project measures (**Table 4.4-1**) encourage energy conservation practices within the Specific Plan area.

TABLE 4.4-1: MCCABE RANCH III SPECIC PLAN ENERGY CONSERVATION MEASURES

Strategy	Project Measure
Energy efficient building design	Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sunscreens to reduce energy use.
Energy efficient building design	Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
Energy efficient building design	Install light colored “cool” roofs, cool pavements, and strategically placed shade trees.
Energy efficient households	Install energy efficient heating and cooling systems, appliances and equipment and control systems, double-paned windows.
Energy efficient households	Install door sweeps and weather stripping if more efficient doors and windows are not available.
Energy efficient lighting	Use low-energy parking lot and streetlights (i.e., sodium).

Source: McCabe Ranch II Specific Plan, 2025.

The following tables present the estimated gasoline demand for construction workers (**Table 4.4-2**) and construction equipment (**Table 4.4-3**) for each of implementation of the proposed McCabe Ranch II TM 994 (Phases 1 – 3) and for the remainder of the Specific Plan Area (Phase 4). All fuel

calculations are based on the total Carbon Dioxide Equivalent (CO2e) value calculated for each construction phase and vehicle miles traveled (VMT) using the California Emission Estimator Model (CalEEMod) version 2022.1. Data are reported in annual metric tons of CO2e for the duration of each construction phase. Metric tons are converted to kilogram CO2e and then divided by a conversion factor used by the USEPA to estimate gallons of gasoline (8.87) and diesel fuel (10.18) consumed based on carbon emissions.

4.4.6.1. Construction Demand

Table 4.4-2 shows the gasoline demand for construction workers by phase and the diesel fuel demand for construction equipment operation. For the purpose of determining fuel demand, it was assumed that all worker vehicles would be gasoline fueled and all construction equipment would diesel fueled.

TABLE 4.4-2: CONSTRUCTION WORKER GASOLINE DEMAND & CONSTRUCTION EQUIPMENT DIESEL DEMAND

Construction Activity - (Year)	Gasoline Gallons	Diesel Fuel Gallons
Phase 1	50,357	**83,487**
Phase 2	**156,020**	**106,905**
Phase 3	**161,940**	**106,907**
Phase 4	**316,988**	**139,931**
TOTAL	**685,305**	**437,230**

Source: Birdseye Planning Group, 2025b (Appendix D).

4.4.6.2. Operational Demand

Table 4.4-3 shows the estimated electricity and natural gas demand during operations of each phase of the Project. Combined demand for all phases would be 34,226,080 kWh of electricity and 53,176,043 BTUs of natural gas. The estimates assume all vehicles would be fueled using gasoline for a combined annual fuel demand of 2,015,557 gallons per year.

TABLE 4.4-3: ESTIMATED OPERATIONAL ELECTRICITY, NATURAL GAS & GASOLINE DEMANDS

Development Phases	Electricity Kilowatt hours (kWh)	Natural Gas British Thermal Units (BTUs)	Estimated Gasoline Demand (Gallons Annually)
Phase 1	2,932,523	11,167,195	241,713
Phase 2	6,264,813	4,087,958	492,897

TABLE 4.4-3: ESTIMATED OPERATIONAL ELECTRICITY, NATURAL GAS & GASOLINE DEMANDS

Development Phases	Electricity Kilowatt hours (kWh)	Natural Gas British Thermal Units (BTUs)	Estimated Gasoline Demand (Gallons Annually)
Phase 3	5,640,101	17,990,278	408,230
Phase 4	19,388,643	19,930,612	872,717
TOTAL	**34,226,080**	**53,176,043**	**2,015,557**

Source: Birdseye Planning Group, 2025b (Appendix D).

Implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment would consume energy in multiple forms. This impact was not specifically identified in the Certified EIR. Although implementation of the Project would increase energy usage compared to current conditions, the County's and the State's requirements for energy-efficient design, would ensure the Project does not waste energy or consume energy in an inefficient or unnecessary manner. This impact would be *less than significant*, and no mitigation is required.

Impact 4.2-2 Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As shown in **Table 4.4-3**, development of the proposed Project would result in an increased use of electricity and natural gas and gasoline. The Project would result in approximately 34,226,080 kWh/yr, 53,176,043 BTU/yr, and an annual gasoline demand of 2,015,557 gallons of approximately 30,727,891. However, the Projects' electrical and natural gas use would be more efficient due to state and local building code requirements and the specific plan area's proximity to transit services. Building efficiency has improved, and the Propjet would not result in energy being used in a wasteful manner. The Specific Plan Update is consistent with State and local plans to use all forms of energy in an efficient manner. This impact is less than significant.

4.4.7 Mitigation Measures

No mitigation is required.

4.4.8 Level of Significance After Mitigation

No significant land use and planning impacts would occur with implementation of the Project. No mitigation is required.

4.5. Environmental Justice

4.5.1 Introduction

The California Environmental Quality Act (CEQA) does not explicitly require analyses of environmental justice. The California Public Resources Code (PRC §21002) requires that an environmental document prepared to meet CEQA requirements evaluate adverse effects to the physical environment, and the ways in which project alternatives and mitigation measures could reduce such effects. An agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]" (PRC, § 21083, subd. (b)(3). CEQA documents may identify existing adverse environmental conditions in the document's discussion of the environmental setting, or in a discussion of cumulative impacts.

This section evaluates the potential for the McCabe Ranch II TM 994 and Specific Plan Amendment to result in disproportionately high and adverse environmental effects on disadvantaged communities (DACs), consistent with the intent of Senate Bill (SB) 1000 and CEQA's requirements for equitable environmental analysis.

As defined by the State of California, environmental justice is the equal treatment of people of all races, cultures and incomes when it comes to environmental laws, regulations and policies (Government Code Section 65040.12(e)). Consistent with State policies, this report addresses the subject of environmental justice with respect to the proposed Project. The evaluation includes the identification of environmental justice communities in the project vicinity as well as a characterization of existing environmental stressors. The potential effects of the Project on both environmental justice communities a are assessed.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from agencies and the public. No comments related to energy systems were received.

4.5.2 Regulatory Setting

State of California

Beginning in 1999, the State of California enacted a series of bills that incorporated the concepts of environmental justice into state law. As a result of these enactments, the term and concept of "environmental justice" has been defined in the California Government Code. Government Code Section 65040.12 (e) defines "environmental justice" as:

> *The fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies.*

California legislation, state agency programs, and guidance have been issued in recent years that aim to more comprehensively address environmental justice issues, including SB 1000 (2016), SB 535 (2012) and Assembly Bill (AB) 1550 (2016), AB 617 (2017), the California Department of Justice Bureau of Environmental Justice, the California Communities Environmental Health Screening Tool (CalEnviroScreen), and the Governor's Office of Planning and Research's (OPR's) 2020 General Plan Guidelines, Environmental Justice Element.

Senate Bill 535 and Assembly Bill 1550

Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the cap-and-trade program is one of several strategies that California uses to reduce greenhouse gases (GHGs) that cause climate change. The state's portion of the cap-and-trade auction proceeds are deposited in the Greenhouse Gas Reduction Fund (GGRF) and used to further the objectives of AB 32. In 2012, the California Legislature passed SB 535 (de Leon), directing that 25 percent of the proceeds from the GGRF go to projects that provide a benefit to disadvantaged communities (DACs). In 2016, the legislature passed AB 1550 (Gomez), which now requires that 25 percent of proceeds from the GGRF be spent on projects located in DACs. The law requires the investment plan to allocate (1) a minimum of 25 percent of the available moneys in the fund to projects located within and benefiting individuals living in DACs; (2) an additional minimum of 5 percent to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the state; and (3) an additional minimum of 5 percent either to projects that benefit low-income households that are outside of, but within 0.5 mile of, DACs, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within 0.5 mile of, DACs. The California Environmental Protection Agency (CAL EPA) identifies Heber and its surrounding census tract as a DAC (CalEPA 2022).

Senate Bill 1000 (SB 1000)

SB 1000, enacted in 2016, requires local governments in California to incorporate Environmental Justice (EJ) into their General Plans when they update two or more elements concurrently. Its purpose is to address disproportionate environmental burdens on disadvantaged communities and promote equitable access to healthy environments.

California Communities Environmental Health Screening Tool

California Public Resources Code Section 71113 directs Cal EPA to address environmental justice concerns throughout the agency's five departments. An element of this statute directs Cal EPA to "[r]ecommend procedures for collecting, maintaining, analyzing, and coordinating information relating to an environmental justice strategy." In response to this directive, Cal EPA identified the Office of Environmental Health Hazard Assessment (OEHHA) as the lead state agency for the assessment of health risks posed by environmental contaminants.

As identified by Cal EPA and OEHHA, understanding and addressing the cumulative vulnerability of communities most impacted by pollution is critical to minimizing environmental health and justice disparities. The agencies define cumulative vulnerability as "the exposure, public health, or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released accounting for sensitive populations and socio-economic factors" (OEHHA 2021).

To assess varying levels of vulnerability throughout the state, the OEHHA has developed a screening tool (CalEnviroScreen or CES) that can be used to develop a comprehensive picture of the burdens California communities face from environmental pollutants and their vulnerability to health and economic impacts. The fourth iteration of this tool (CalEnviroScreen 4.0) was released in October 2021.

Imperial County

The County commenced efforts to prepare an Environmental Justice Element in 2017. The Environmental Justice (EJ) Element is a legally required part of a General Plan, which is the overall planning document that sets the County's policies for planning, development, and conservation. Under SB 1000, jurisdictions like Imperial County that contain environmental justice communities that are disproportionately affected by environmental pollution and other hazards are required to develop and adopt an EJ Element upon the update of two or more General Plan elements. The goal of an EJ Element is to address the compounded social, economic, and health issues faced by environmental justice communities, to promote community engagement in the public decision-making process, and to identify objectives and policies that prioritize improvements and programs that address the needs of environmental justice communities.

In 2017, the County took steps to promote sustainable, affordable housing by incorporating ADU language into the County's Land Use Ordinance. The County made additional changes to the Land Use Ordinance in 2019 regarding cannabis and industrial hemp uses, and in 2020 made additional changes to Divisions 4, 5, 8, 10, 12, 14, and 16 of the Land Use Ordinance.

From 2020 to 2023, the County updated the Housing Element and Seismic and Public Safety Element to be consistent with State law. These update processes included a review of disadvantaged unincorporated communities, evaluating potential housing sites in hazard prone areas, and a Climate Change Vulnerability Assessment that identified which populations are most vulnerable to climate change hazards.

In 2021, the County adopted the Multi-Jurisdictional Hazard Mitigation Plan (MHMP) as part of the Seismic and Public Safety Element. In 2022, the County updated Divisions 5, 8, 14, and 16 of the Land Use Ordinance pursuant to recent FEMA Floodplain Management Regulations.

As of the date of publication of this Supplemental EIR, the EJ Element has not been completed and is under preparation to align with the six basic concepts adopted by the Board of Supervisors in support of the County's overall General Plan:

- Quality of life
- Safety for people and property
- Wide selection of social and economic opportunities
- Efficient use of natural, human, and financial resources
- Clean air, water, and land
- Quiet, beautiful communities and rural areas

Environmental justice issues also are addressed by goals and policies set forth in various Elements of the Imperial County General Plan. These include, but are not necessarily limited to the Conservation and Open Space Element, Housing Element, Land Use.

4.5.3 Thresholds of Significance

Guidelines for Determination of Significance

As noted earlier, currently there are no formal requirements or procedures to evaluate potential environmental justice impacts under CEQA. CEQA is an informational statutory process that addresses impacts of a project that can or will potentially cause a physical change to the environment. However, the following assessment of potential disproportionate environmental effects to low-income and minority populations is generally consistent with the environmental justice guidelines for the National Environmental Policy Act (NEPA) identified in the federal document: Environmental Justice: Guidance Under the National Environmental Policy Act (Council on Environmental Quality, 1997). The criterion below was used to determine if the Proposed Project would result in an environmental justice impact:

1. If high and adverse project impacts disproportionately affect an Environmental Justice Community.

4.5.4 Analysis of Project Effects and Significance Determination

Impact 4.5-1: Would the Project result high and adverse project impacts that disproportionately affect an Environmental Justice Community?

CalEnviroScreen is a science-based mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. The tool uses environmental, health, and socioeconomic information to produce scores for every census tract[1] in the state. The scores are mapped so that different communities can

be compared. For example, an area with a high score is one that experiences a much higher pollution burden than areas with low scores.

The CalEnviroScreen tool is composed of a suite of 21 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's adverse health effects. The indicators fall into four broad categories, including "Exposures", "Environmental Effects", "Sensitive Populations", and "Socioeconomic Factors", as defined below.

Pollution Burden	**Exposures**	**Contact with Pollution**
	Environmental Effects	**Adverse Economic Conditions Caused By Pollution**
Population Characteristics	Sensitive Populations	Populations with biological traits that may magnify the effects of exposure to pollution
	Socioeconomic Factors	Community characteristics that result in increased vulnerability to pollution

These broad categories are further divided into the following measurable indicators.

Pollution Burden		**Population Characteristics**
Exposures		**Sensitive Populations**
Ozone (an air pollutant)	$PM_{2.5}$ (fine dust; an air pollutant)	Asthma Emergency Department Visits
Diesel Particulate Matter Emissions	Drinking Water Contaminants	Cardiovascular Disease (Emergency Department Visits for Heart Attacks)
Children's Lead Risk from Housing	Pesticide Use	Low-birth weight infants
Toxic Releases from Facilities	Traffic Impacts	NA
Environmental Effects		**Socioeconomic Factors**
Toxic Cleanup Sites		Educational Attainment
Groundwater Threats from Leaking Underground Storage Sites and Cleanups		Housing Burdened Low Income Households
Hazardous Waste Facilities and Generators		Linguistic Isolation
Impaired Water Bodies		Poverty
Solid Waste Sites and Facilities		Unemployment

CalEnviroScreen ranks communities based on data that are available from state and federal government sources. The model uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract throughout the state. Once all characteristics are scored, the model calculates a final CalEnviroScreen score by multiplying the pollution burden and population characteristics components together. The model then compares the

score to all other census tracts in the state and assigns a comparative rating presented in the form of a percentile. The lower the percentile, the less polluted and/or less sensitive the area is. Thus, the percentile measures the relative pollution burdens and vulnerabilities in a census tract compared to all others in the state. It is not a measure of health risk. Nor does it describe the magnitude of the difference between two or more areas. For example, an area ranked in the 30th percentile is not necessarily three times more impacted than an area ranked in the 10th percentile.

CalEnviroScreen Results

McCabe Ranch II Specific Plan area information for Census Tract 6025011300 ,developed by CalEnviroScreen for each of the 21 indicators, is presented in **Table 4.5-1**. According to CalEnviroScreen data, this census tract ranks high in multiple pollution indicators including:

Pollution Exposure

- PM2.5 (Fine Particulate Matter): Elevated levels due to dust and agricultural emissions.
- Ozone: High concentrations, likely influenced by regional transport and vehicle emissions.
- Diesel PM: Significant exposure from freight and agricultural equipment.
- Pesticide Use: Among the highest in the state, reflecting intensive agricultural practices.
- Drinking Water Contaminants: Elevated risk from nitrate and other pollutants.
- Traffic Density: Moderate, with exposure from highways and border-related traffic.
- Toxic Releases: Present, though not dominant.

Environmental Characteristics

- Groundwater Threats: Present due to agricultural runoff and legacy contamination.
- Hazardous Waste Sites: Identified within or near the tract.
- Cleanup Sites: Active or legacy sites requiring remediation.
- Impaired Water Bodies: Nearby water sources show signs of pollution.

Population Characteristics

This tract also shows high vulnerability due to:

- Poverty: High percentage of households below the poverty line.
- Unemployment: Elevated rates compared to state averages.

To establish a comprehensive CalEnviroScreen score that measures both the pollution burden and population characteristics, the model combines the individual scores to derive an overall result. For the residents of the census tract , the combined score indicates that residents of this census tract are

exposed to a cumulative environmental justice burden than is greater than that for 88 percent of all census tracts in California. See the Overall CES Score in **Table 4.5-1.**

TABLE 4.5-1 CALENVIROSCREEN RESULTS FOR MCCABE RANCH II SPECIFIC PLAN (CENSUS TRACT 6025100300)

Category	Indicator	Score	Percentile
Pollution Burden: Exposure Indicators			
Ozone	Mean of summer months (May-October) of the daily maximum 8-hour ozone concentration (ppm), averaged over three years (2017 to 2019).	0.05	62.70
PM2.5	Annual mean concentration of PM2.5 (weighted average of measured monitor concentrations and satellite observations, µg/m3), over three years (2015 to 2017).	9.41	43.37
Diesel Particulate Matter	Spatial distribution of gridded diesel PM emissions from on-road and non-road sources 2016 (tons/year).	0.079	29.32
Drinking Water Contaminants	Drinking water contaminant index for selected contaminants (2011 to 2019)	481.79	58.32
Children's Lead Risk from Housing	Potential risk for lead exposure in children living in low-income communities with older housing.	40.84	38.30
Pesticide Use	Total pounds of 132 selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile, averaged over three years (2017 to 2019).	1,721.75	92.14
Toxic Releases from Facilities	Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration (averaged over 2017 to 2019 and including releases from Mexican facilities averaged over 2014 to 2016).	175.15	32.07
Traffic Impacts	Sum of traffic volumes adjusted by road segment length (vehicle-kilometers per hour) divided by total road length (kilometers) within 150 meters of the census tract (traffic volumes estimates for 2017).	556.83	25.25
Pollution Burden: Environmental Effects Indicators			
Cleanup Sites	Sum of weighted sites within each census tract. (Data downloaded July 2021)	2	25.63
Groundwater Threats[3]	Sum of weighted GeoTracker leaking underground storage tank sites within buffered distances to populated blocks of census tracts	18.3	65.66
Hazardous Waste Generators and Facilities	Sum of weighted permitted hazardous waste facilities, hazardous waste generators, and chrome plating facilities within each census tract.	0.95	84.49
Impaired Water Bodies	Impaired water bodies, sum of number of pollutants across all impaired water bodies within buffered distances to populated blocks of census tracts.	26	99.52
Solid Waste Sites and Facilities	Solid Waste Information System (SWIS) and Closed, Illegal, and Abandoned (CIA) Disposal Sites Program, California Department of Resources Recycling and Recovery – CalRecycle	22.6	98.88
Population Characteristics: Sensitive Population Indicators			
Asthma	Spatially modeled, age-adjusted rate of ED visits for asthma	68.86	77.59

TABLE 4.5-1 CALENVIROSCREEN RESULTS FOR MCCABE RANCH II SPECIFIC PLAN (CENSUS TRACT 6025100300)

Category	Indicator	Score	Percentile
	per 10,000 (averaged over 2015-2017)		
Cardiovascular Disease	Spatially modeled, age-adjusted rate of emergency department (ED) visits for Acute myocardial infarction (AMI) per 10,000 (averaged over 2015-2017).	18.86	83.72
Low Birth Weight Infants	Percent low birth weight, (averaged over 2009-2015).	4.5	38.71
Population Characteristics: Socioeconomic Factor Indicators			
Educational Attainment	Percent of the population over age 25 with less than a high school education (5-year estimate, 2015-2019).	34.7	84.92
Housing Burdened Low Income Households	Housing Burdened Low Income Households. Percent of households in a census tract that are both low income (making less than 80% of the HUD Area Median Family Income) and severely burdened by housing costs (paying greater than 50% of their income to housing costs). (5-year estimates, 2013-2017).	14.3	34.8
Linguistic Isolation	Percent limited English-speaking households, (2015-2019).	28.1	94.63
Poverty	Percent of the population living below two times the federal poverty level (5-year estimate, 2015-2019).	48.6	80.34
Unemployment	Percent of the population over the age of 16 that is unemployed and eligible for the labor force. Excludes retirees, students, homemakers, institutionalized persons except prisoners, those not looking for work, and military personnel on active duty (5-year estimate, 2015-2019).	7.7	73.41
	Pollution Burden Summary Score	**56.73**	**6.93**
	Population Characteristics Summary Score	**7.33**	**80.94**
	Overall CES 4.0 Score	**50.80**	**88.64**

Source: California OEHHA, CalEnviroScreen 4.0, CES4Results Data Dictionary; October 2021; obtained October 2025.

Census Tracts in the top 25% (75th percentile and above) are considered Disadvantaged Communities (DACs) under SB 535 and SB 1000. Therefore, as shown on **Table 4.5-1**, the McCabe Ranch II SPA is considered a "Disadvantaged Community".

Imperial County Comparative CalEnviroScreen Results

Imperial County-specific information developed by CalEnviroScreen for the Pollution Burden Summary and Population Characteristics Summary Scores, together with the Overall CES 4.0 Score, are set forth in **Table 4.5-2.**

TABLE 4.5-2 CALENVIROSCREEN SCORES FOR IMPERIAL COUNTY CENSUS TRACTS

Census Tract	Nearest Community	Pollution Burden Percentile	Pop. Characteristic Percentile	CES 4.0 Percentile
6025012100	Calexico	91.56	91.55	**96.03**
6025012200	Calexico	**92.35**	87.01	94.70
6025011400	El Centro	81.01	92.31	92.41
6025010400	Brawley	65.49	**98.06**	91.05
6025010200	Unincorp. Imperial County area	61.31	97.47	88.84
6025011300	Unincorp. Imperial County area	85.76	83.23	88.64
6025010500	Brawley	64.52	93.47	86.83
6025011500	El Centro	63.53	92.79	85.88
6025010600	Brawley	83.15	77.45	85.21
6025011900	Unincorp. Imperial County area	88.71	70.52	84.29
6025010700	Brawley	47.80	96.79	82.17
6025010102	Unincorp. Imperial County area	63.14	86.28	81.69
6025011202	El Centro	55.47	91.84	81.66
6025012001	Calexico	50.74	94.93	81.56
6025011100	Seeley	71.10	77.95	80.19
6025011700	El Centro	46.88	92.08	77.55
6025012002	Calexico	54.10	86.11	77.42
6025011000	Unincorp. Imperial County area	82.90	62.27	75.88
6025010300	Unincorp. Imperial County area	63.37	75.05	74.84
6025011600	El Centro	41.08	87.36	71.58
6025010900	Holtville	35.27	85.91	67.83
6025011802	El Centro	45.24	75.43	66.67
6025011201	Unincorp. Imperial County area	60.20	56.48	61.99
6025010800	Unincorp. Imperial County area	55.08	56.00	59.33
6025012400	Unincorp. Imperial County area	44.82	**50.38**	50.52
6025011803	El Centro	29.23	60.97	49.51
6025012302	Unincorp. Imperial County area	**16.63**	67.21	44.15
6025011801	El Centro	19.95	56.69	40.77
6025940000	Unincorp. Imperial County area	28.13	47.38	40.12
6025012301	Unincorp. Imperial County area	23.93	45.21	**36.06**
6025010101	Unincorp. Imperial County area	42.75	NA	NA
All	**MEAN**	**56.62**	**75.36**	**70.82**

Note: The highest value in each column is indicated in **red font**. The lowest value in each column is indicated in **green font**.
Sources: CalEnviroScreen 4.0 Results for 31 census tracts in Imperial County obtained October 2025.

In general, residents of census tract 6025011300 have a similar overall pollution burden when compared with other rural census tracts in the County. On balance, the combination of the moderate pollution burden and high population characteristics yields an Overall CES 4.0 percentile score that

indicates that the area in the vicinity of the McCabe Ranch II Specific Plan is burdened with more adverse environmental effects than similar areas of Imperial County as described in Table 4.5-2.

Environmental Justice Results

With respect to Statewide environmental justice standards, the Heber census tract is among the most environmentally burdened communities in California. As proposed, the McCabe Ranch II TM 994 and Specific Plan Amendment Project would not result in adverse environmental justice effects for the following reasons:

For seven (7) indicators of environmental pollution for which the Heber Census is above the 50th percentile (Ozone, Drinking Water Contaminants Pesticide Use, Groundwater Threats, Hazardous Waste Generators and Facilities, and Impaired Water Bodies) implementation of the Project would not significantly contribute to the generation or release of any of these pollutants.

- Development of the McCabe Ranch II TM would replace the agricultural use of the site thereby reducing the use of pesticides.
- No changes in cultivation or crops are contemplated for the proposed dairy expansion; hence, there would be no change in the use of pesticides on the project site. For drinking water threats, the project is consistent with state and County policies to protect surface waters during project construction and operation. Additionally, the SPA, once annexed into the Heber Public Utilities District would be served by an urban water provider.
- Implementation of the Project would not adversely influence or increase existing socioeconomic factors such as educational attainment, poverty, or unemployment that could heighten area residents' sensitivity to environmental pollutants. In fact, the proposed commercial business park uses would provide new employment opportunities to the area.
- While not an environmental pollutant included in CalEnviroScreen, odor is an issue of community concern in agricultural areas. As noted in Section 4.2 of the Supplemental EIR (Air Quality), the Project is not expected to result in emissions such as those leading to odors that would adversely affect a substantial number of people.
- Because of the linguistic isolation of Heber residents, any public outreach or distribution of flyers or other documents associated with the Noise Control Plan, be made available in Spanish in addition to English.

4.5.5 Mitigation Measures

No significant adverse impacts to environmental justice resulting from the Proposed Project are anticipated. Therefore, no mitigation measures beyond those previously identified in Chapter 4 of the Supplemental EIR are required.

4.5.6 Level of Significance After Mitigation

The proposed Project would not result in significant impacts associated with environmental justice.

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4.6. Greenhouse Gas Emissions

4.6.1 Introduction

This section provides the supplemental analysis required to assess the McCabe Ranch II TM 994 and Specific Plan Amendment's potential to cumulatively contribute to greenhouse gas (GHG) emission impacts. No single project is large enough to result in a measurable increase in global concentrations of GHG emissions; therefore, impacts of the proposed Project are evaluated on a cumulative basis. This section also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR.

The following discussion also addresses the proposed Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing GHG emissions.

Information used in preparing this section and in the evaluation of potential impacts to biological resources was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037. Additionally, the analysis in this was derived from the *Air Quality/Greenhouse Gas Study for the McCabe Ranch II TM 994 and Specific Plan Amendment* prepared by Birdseye Planning Group (Birdseye, 2025a; Appendix B).

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. No issues related to greenhouse gas emissions were raised.

4.6.2 Summary of Certified EIR Findings

Potential climate change and greenhouse gas impacts associated with development within the McCabe Ranch II Specific Plan were evaluated in Section 4.16 of the Certified EIR. The Certified EIR found that that long-term operations of the McCabe Ranch II Specific Plan would result in substantial net increases in GHG and "carbon dioxide equivalent"(CO2e) [(1)] emissions, either directly or indirectly generating greenhouse gas emissions, that may have a significant impact on the environment. This impact was considered potentially cumulatively considerable. The Certified EIR also identified Specific Plan design features and mitigation measure MM 4.16.1 to reduce impacts to less than significant.

4.6.3 Environmental Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are

[1] Carbon Dioxide Equivalent.

formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, CH_4 has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis.

In 2021, California produced 381.3 million metric tons of carbon dioxide equivalent (MMTCO2e) in GHG emissions. This represented a 3.4% increase from 2020. However, these emissions were still 5.7% lower than the pre-pandemic 2019 level and 11.5% below the 1990 level. The major source of GHG in California is transportation, contributing 39.9 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state's GHG emissions. California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In July 2017, California's state legislature passed Assembly Bill (AB) 398 to reauthorize and extend until 2030 the state's economy-wide GHG reduction program. California has established a GHG target of at least 40% below the 1990 level of emissions by 2030.

4.6.4 Regulatory Setting

State

Executive Order S-3-05

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 states that by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels. In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report

recommended various strategies that the state could pursue to reduce GHG emissions. These strategies could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture.

Assembly Bill 32 and CARB' Scoping Plan

To further the goals established in EO S-3-05, the Legislature passed Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, the California Air Resources Board (CARB) is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2e). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following:

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33%;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions;

4. Establishing targets for transportation related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan (CARB 2008), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020) absent GHG reducing laws and regulations (referred to as "business as usual (BAU)). To calculate this percentage reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document, CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7% (down from 28.5%) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009–2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 28.5%) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050. Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands.

The First Update identifies key recommended actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal.

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050". These technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the Intergovernmental Panel on Climate Change (IPCC). Using the recalculated 1990 emissions level (431 MMT CO_2e) and the revised 2020-emissions-level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 28.5% or 16%) from the BAU conditions.

In January 2017, CARB released, *The 2017 Climate Change Scoping Plan Update*, for public review and comment. This update proposes CARB's strategy for achieving the state's 2030 GHG target as established in SB 32, including continuing the Cap-and-Trade Program through 2030, and includes a new approach to reduce GHGs from refineries by 20%. The Second Update incorporates approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document that was adopted by CARB in March 2017), acknowledges the need for reducing emissions in agriculture, and highlights the work underway to ensure that California's natural and working lands increasingly sequester carbon. During development of the Second Update, CARB held a number of public workshops in the Natural and Working Lands, Agriculture, Energy, and Transportation sectors to inform development of the 2030 Scoping Plan Update. The Second Update has not been considered by CARB's Governing Board at the time this analysis was prepared.

Executive Order S-01-07

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

Assembly Bill 939 and Senate Bill 1374

AB 939 requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill (SB) 1374 requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004, suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Senate Bill 1368

SB 1368 is the companion Bill of AB 32 and was adopted September 2006. SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007, and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by the CPUC and the California Energy Commission (CEC).

Senate Bill 97

SB 97 was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under CEQA.

SB 97 directed the Governor's Office of Planning and Research (OPR), now known as the Governor's Office of Land Use and Climate, to develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010. Pursuant to the requirements of SB 97 as stated above, on December 30, 2009, the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010, and are summarized below:

1. Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.

2. Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.

3. When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies or recommended by experts.

4. New amendments include guidelines for determining methods to mitigate the effects of

greenhouse gas emissions in Appendix F of the CEQA Guidelines.

5. OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."

6. OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

7. EIRs must specifically consider a project's energy use and energy efficiency potential.

Senate Bills 1078, 107, and X1-2 and Executive Orders S-14-08 and S-21-09

SB 1078 requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 changed the target date to 2010. EO S-14-08 was signed on November 2008 and expands the State's Renewable Energy Standard to 33 percent renewable energy by 2020. EO S-21-09 directed CARB to adopt regulations by July 31, 2010, to enforce S-14-08. SB X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations Title 24, Part 6

California Code of Regulations (CCR) Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions. The Energy Commission adopted 2008 Standards on April 23, 2008, and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. All buildings for which an application for a building permit is submitted on or after July 1, 2014, must follow the 2013 standards. The 2013 commercial standards are estimated to be 30 percent more efficient than the 2008 standards; 2013 residential standards are at least 25 percent more efficient. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

Senate Bill 375

SB 375 was adopted in September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a Sustainable Communities Strategy (SCS) or alternate

planning strategy (APS) that will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable community's strategy or alternate planning strategy for consistency with its assigned targets.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, CEQA incentivizes, through streamlining and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as "transit priority projects."

Senate Bill X7-7

SB X7-7, enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

California Green Building Standards (Title 24, Parts 6, 11 and Title 20)

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the CEC (and revised if necessary) (California Public Resources Code, Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402(d)) and cost effectiveness (California Public Resources Code, Sections 25402(b)(2) and (b)(3)). These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2019 Title 24 building energy efficiency standards and became effective on January 1, 2020, and addressed lighting, heating, cooling, ventilation, and water heating standards. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards and strengthens ventilation standards.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as "CALGreen," and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards initially took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low- rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2019 standards became effective on January 1, 2020. The CALGreen 2022 standards are the most current and became effective January 2023. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance;
- Diversion of 65% of construction and demolition waste from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle board.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs (24 CCR Part 11).

The California Public Utilities Commission, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include the following: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030. As most recently defined by the CEC in its 2015 Integrated Energy Policy Report, a ZNE code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's Time Dependent Valuation metric.

In November 2022, CARB released a proposal to set new targets for renewable energy, clean buildings, carbon removal, and clean fuels in the transportation sector. If adopted by CARB, this plan will implement actions to build out a 100% clean energy grid, achieve carbon neutrality by 2045.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the California Energy Commission (CEC) to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-30-15

Executive Order B-30-15 (EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B- 30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO_2e. EO B-30-15 also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

SB 350— Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

8. Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 45 percent by 2027.

9. Double the energy efficiency in existing buildings by 2030. This target will be achieved through the CPUC, the CEC, and local publicly-owned utilities.

10. Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

SB 100

On September 10, 2018, Governor Brown signed SB 100, which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of

electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18

On September 10, 2018, Governor Brown signed Executive Order B-55-18, which established a new statewide goal to achieve carbon neutrality as soon as possible and no later than 2045. The executive order also states that California will achieve and maintain net negative emissions thereafter.

AB 2127

AB 2127 promotes better planning for EV infrastructure build-out across all vehicle classes. AB 2127 would help the state meet the goal of having 5 million zero-emission vehicles (ZEV) on the road by 2030.

Local and CEQA Requirements

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State California Environmental Quality Act (CEQA) Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions.

The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents but contain no suggested thresholds of significance for GHG emissions. Instead, lead agencies are given the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant.

The California Supreme Court addressed the issue of GHG emissions and the evaluation of potential impacts in CEQA documents, in the Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming case, (2015) 224 Cal.App.4th 1105 (CBD vs. CDFW), also known as the “Newhall Ranch” case. The justices examined one of the most common approaches to GHG analyses for development projects which was evaluating the efficiency of a project’s emissions reduction in the context of the AB 32’s 2020 reduction goal, as presented in the statewide CARB Scoping Plan, using a comparison to an unregulated, BAU emissions scenario. As discussed in the Newhall Ranch decision, determining consistency with local GHG reduction plans or Climate Action Plans that qualify under Section 15183.5 of the CEQA Guidelines may be the most effective strategy for local governments to assess the significance of GHG emissions from proposed land development projects. Qualified CAPs also provide a workable option for addressing

post-2020 GHG emissions and resolving issues that arise out of project-level GHG analyses raised in the Court's decision.

The Imperial County Transportation Commission adopted a Climate Action Plan (June 2021); however, no specific quantitative thresholds are provided to evaluate whether specific projects would have adverse impacts with respect to GHG emissions. As stated in Section 15064.7(c) of the CEQA Guidelines, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the lead agency's decision is supported by substantial evidence. Thus, in the absence of any GHG emissions significance thresholds, the projected emissions are compared to the SCAQMD numeric threshold of 3,000 metric tons of CO2e annually. This threshold is also appropriate as the SCAQMD GHG thresholds were formulated based on similar geography and climate patterns as found in Imperial County and are used for determining the significance of GHG emissions in the Riverside County portion of the Salton Sea Air Basin, the air basin where the project is located.

Therefore, the 3,000 metric ton of CO2e threshold is appropriate for analysis of the proposed Project. The Project is also evaluated for consistency with regulations or requirements adopted by the 2017 CARB Climate Change Scoping Plan and 2022 Scoping Plan Update. GHG emissions were modeled using CalEEMod 2022.1, the statewide land use emissions computer model designed to estimate air and GHG emissions associated with both construction and operations from land development projects.

General Plan Consistency

No specific GHG regulations pertaining to projects within the County of Imperial have been developed by the County or the ICAPCD. Both entities rely upon the CEQA Guidelines that govern the evaluation of impacts associated with GHG emissions, as well as on guidance provided by OPR in its technical advisory document, CEQA and Climate Change: Addressing Climate Change through CEQA Review, published in October 2008.

4.6.5 Analysis of Project Effects and Significance Determination

4.6.5.1. Guidelines for Determination of Significance

Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed Project would be significant if the project would:

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

2. Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

Methodology

GHG emissions associated with construction and operation of the proposed project and existing development have been estimated using California Emissions Estimator Model (CalEEMod) version 2022.1.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily associated with the operation of construction equipment, worker trips and truck trips required for hauling excavation spoils, materials and equipment. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used on-site at one time. Air districts such as the SDAPCD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Complete CalEEMod results and assumptions can be viewed in the Appendix.

Operational Emissions

Default values used in CalEEMod version 2022.1 are based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions of CO2, N2O and CH4. This methodology has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC; and therefore, is considered reasonable and reliable for use in GHG impact analysis pursuant to CEQA. It is also recommended by CAPCOA (January 2008).

Emissions associated with area sources (i.e., consumer products, landscape maintenance, and architectural coating) were calculated in CalEEMod based on standard emission rates from CARB, USEPA, and district supplied emission factor values (CalEEMod User Guide, 2022). Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste

(CalEEMod User Guide, 2022). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. Emissions from mobile sources were quantified based on trip generation rates in Trip Generation Memorandum (June 2023).

4.6.5.2. Impact Analysis

Impact 4.6-1: Would the Project result in the generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Previously Identified Level of Significance

The Certified EIR determined that implementation of the McCabe Ranch II Specific Plan had the potential to result in a substantial increase in the emission of GHGs during the construction and operational phases. Given the recommended guidance from the Attorney General and Office of Planning and Research at the time the Final EIR was certified, the analysis still considered all feasible measures that could reduce GHG emissions were considered. To that end, air quality mitigation measures MM 4.3.1 through MM 4.3.2, as well as several project design features, were found to help reduce GHG emissions from project construction and operations. **Table 4.6-1** (presented as Table 4.16-1 in the Certified EIR) summarizes the overall design features and/Specific Plan Policies that could reduce GHG emissions from motor vehicles, energy use, water consumption, or construction activities.

TABLE 4.6-1 PROJECT FEATURES THAT IMPLEMENT FEASIBLE MITIGATION MEASURES TO REDUCE GHG EMISSIONS

Strategy	Source Category	Project Measure
Reduce VMT	Transportation	The inclusion of commercial and other residential-serving land uses will help reduce VMT for residents of the proposed project.
Reduce vehicle emissions	Transportation	Provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles.
Reduce vehicle emissions	Transportation	Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.
Reduce VMT	Transportation	On and off-site pedestrian and bicycle improvements to encourage non-motorized forms of transportation, secure bike storage at parks and recreation areas and retail facilities, new bicycle lanes.
Reduce VMT	Transportation	Provide facilities for buses and other transit options.
Reduce VMT	Transportation	Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.

TABLE 4.6-1 PROJECT FEATURES THAT IMPLEMENT FEASIBLE MITIGATION MEASURES TO REDUCE GHG EMISSIONS

Strategy	Source Category	Project Measure
Energy efficient building design	Energy	Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
Energy efficient building design	Energy	Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
Energy efficient building design	Energy	Install light colored "cool" roofs, cool pavements, and strategically placed shade trees.
Energy efficient households	Energy	Install energy efficient heating and cooling systems, appliances and equipment and control systems, double-paned windows.
Energy efficient households	Energy	Install door sweeps and weather stripping if more efficient doors and windows are not available.
Energy efficient lighting	Energy	Use low-energy (low sodium) parking lot and streetlights.
Water-wise households	Water	Install high-efficiency fixtures and equipment to reduce energy and water usage, including Energy Star equipment, low-flow plumbing fixtures .
Water-wise operations	Water	Create water-efficient landscapes.
Water-wise operations	Water	Install water-efficient irrigation systems and devices such as soil moisture-based irrigation controls.
Water-wise operations	Water	Design buildings to be water-efficient. Install water-efficient fixtures and appliances.
Water-wise operations	Water	Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.
Reduce waste flows	Waste	Provide interior and/or exterior storage areas where appropriate for recyclables and green waste and adequate recycling containers located in public areas if such recycling programs are available.

Source: McCabe Ranch II Specific Plan Final Environmental Impact Report, 2018 (Table 4.16-1).

Proposed Project Impact Analysis

Construction of proposed improvements would generate GHG emissions. Site preparation activities, site grading, exhaust from vehicles transporting construction materials and personnel, and emissions from heavy-duty construction equipment would generate GHG emissions. Construction emissions would vary based on the number and types of heavy-duty vehicles and equipment in use, the intensity of construction activities, the number of construction personnel involved, and the length of time over which these construction activities would occur. Implementation would generate GHG emissions from truck and employee/vendor trips and use of heavy equipment. The Project would not produce electrical power or offset emissions associated with carbon-based fuels.

Construction Emissions

The construction activity analysis is based on the anticipated three-year construction period for Phases 1, 2 and 3. Modeling assumed construction would begin in 2025 and conclude in 2033 with the completion of Phase 4. Development within Phase 4 (i.e., that portion of the McCabe Ranch II Specific Plan area outside of proposed Tract Map 994), may develop prior to, concurrently with, or subsequent to the Tract Map 994. To provide a conservative assessment, Phase 4 was assumed to begin in 2034 and conclude in late 2037. Based on CalEEMod results, construction activity for the Phases 1, 2 and 3 would generate an estimated 9,989 metric tons of carbon dioxide equivalent (CO_2E). Phase 4 would generate 4,233 metric tons CO_2E as shown in **Table 4.6-2**. Amortized over a 30-year period (the assumed life of the project), construction of Phase 1, 2 and 3 of the Project would generate 332 metric tons of CO_2E per year. Phase 4 is anticipated to generate 141 CO_2E per year.

TABLE 4.6-2. ESTIMATED CONSTRUCTION RELATED GREENHOUSE GAS EMISSIONS

Year	Annual Emissions (metric tons CO_2E)
PHASE 1, 2 AND 3	
Phase 1	
2025	166
2026	681
2027	592
2028	326
Phase 2	
2029	479
2030	776
2031	921
2032	1,007
2033	427
Phase 3	
2034	475
2035	773
2036	924
2037	996
2038	1,011
2039	435
Subtotal	**9,989**
AMORTIZED OVER 30 YEARS	**332**

TABLE 4.6-2. ESTIMATED CONSTRUCTION RELATED GREENHOUSE GAS EMISSIONS

Year	Annual Emissions (metric tons CO_2E)
Phase 4	
2034	780
2035	1,402
2036	1,400
2037	651
Total	**4,233**
AMORTIZED OVER 30 YEARS	**141**

Notes: See Appendix for CalEEMod software program output.

Source: ICAPCD, 2017 (Table 4); /Birdseye Planning Group, 2025a (Appendix B)

Operational Emissions

Long-term operational emission would be generated by the following:

- Consumption of energy, both electricity and natural gas;
- Electricity generated to supply and convey water demand for the project and emissions generated by the disposal of solid waste;
- Transportation (i.e., Mobile) emissions; and
- Refrigerants and other area emission.

Table 4.6-3 combines construction, operational, and mobile GHG emissions associated with the proposed Project. Phases 1, 2 and 3 would generate approximately 16,650 metric tons of CO_2E (MT CO_2E) annually. Phase 4 would generate approximately 14,534 MT CO_2E annually; for a combined total of 40,276 MT CO2E.

Compared to the threshold of 3,000 MT CO_2E annually, the GHG emissions generated by each individual phase of the Project annually and the annual combined GHG emissions of all four phases would cumulatively exceed the 3,000 MT CO_2E screening threshold. Emissions shown on **Table 4.6-3** for water and solid waste are unmitigated; thus, actual emissions, assuming a 20% reduction in water consumption required per SB X7-7 and a 75% reduction in landfilled solid waste required per AB 939 would result in fewer GHG emissions associated with each project phase. However, similar to the Certified EIR's analysis, even with a reduction in water and solid waste emissions, construction and operational GHG emissions would exceed the 3,000 MT CO_2E annual threshold. Implementation of mitigation measure MM 4.16.1 would reduce impacts to below a level of significance.

TABLE 4.6-3. COMBINED ANNUAL GREENHOUSE GAS EMISSIONS

Emission Source	Annual Emissions (CO_2E) Metric Tons
Phase 1	
Construction	58
Operational	
Energy	1,204
Water/Solid Waste	207
Area Sources	4
Refrigerants	1
Mobile	2,101
Subtotal	**3,575**
Phase 2	
Construction	120
Operational	
Energy Water/	2,313
Solid Waste	385
Area Sources	8
Refrigerants	1
Mobile	4,176
Subtotal	**7,003**
Phase 3	
Construction	154
Operational	
Energy	2,130
Water/Solid Waste	342
Area Sources	8
Refrigerants	1
Mobile	3,437
Subtotal	**6,072**
Phases 1, 2 and 3 Subtotal	**16,650**
Phase 4	
Construction	141
Operational	
Energy	5,311
Water/Solid Waste	633
Area Sources	15
Refrigerants	663
Mobile	7,741
Subtotal	14,534

TABLE 4.6-3. COMBINED ANNUAL GREENHOUSE GAS EMISSIONS

Emission Source	Annual Emissions (CO_2E) Metric Tons
COMBINED TOTAL	**31,184**

Notes: See Appendix B for CalEEMod software program output.

Source: Birdseye Planning Group, 2025a (Appendix B).

Impact 4.6-2: Would the Project conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Previously Identified Level of Significance

The Certified EIR evaluated the Project's consistency with AB 32, which at the time, was the only adopted applicable plan that reduced GHG. The Previous Final 2010 FEIR found that there was no simple metric available to determine if a single project would help or hinder meeting the AB 32 emission goals. This impact was considered potentially cumulatively considerable. The Certified EIR found that the project design features shown on **Table 4.6-1** (presented as Table 4.16-1 in the Certified EIR) along with implementation of mitigation measures MM 4.3.1, MM 4.3.2 and MM 4.16.1 would reduce this impact to less than cumulatively considerable.

Proposed Project Impacts

As stated, the County of Imperial does not have a Climate Action Plan and the Imperial County Transportation Commission June 2021 Climate Action Plan does not provide GHG emission thresholds for CEQA purposes. However, the applicant would be required to implement California Energy Code Title 24 requirements in place at the time individual phases or components thereof, are submitted for design review and approval. These requirements would address energy and water use reduction, promotion of green building measures, waste reduction and reduction in vehicle miles traveled. Further, the proposed Project would be required to implement all mandatory green building measures for new residential, commercial/retail and school facility development under the CALGreen Code. This would require the project phases be designed to minimize water consumption, increase building system efficiencies, divert construction waste from landfills and maintain buildings systems. Implementation of these building and appliance standards would result in the efficient use of water and energy and reduce the volume of landfilled solid waste during both construction and operation.

The Energy Code, which is published by the California Building Standards Commission as part of the California Building Standards Code, reduces GHG emissions by making buildings more energy efficient; encouraging the use of energy efficient heat pumps for space and water heating; using clean energy generated onsite by solar panels in combination with battery storage; and shifting times of energy use to avoid peak periods of the day when dirty and inefficient powerplants are supplying more power to the grid.

There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the Project's operational year is post-2020, the Project would be designed to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at the Project level is not addressed. The proposed project would not conflict with statewide plans and regulations. The following summarizes project consistency with Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and the 2017 CARB scoping plan and 2022 Scoping Plan Update.

Connect SoCal 2020-2045 RTP/SCS Consistency. On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that uses land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people to improve the lives of Southern California Residents, includes those in Imperial County.

Further, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG emission reduction goals and federal CAA requirements. Because the Project would utilize the existing street network for primary access to the area it would not conflict with plans to integrate the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The Project would be consistent with or would not conflict with any of the goals identified in Connect SoCal.

SB 32/2017 Scoping Plan Consistency. The 2017 Scoping Plan Update reflects the statewide 2030 target of a 40% reduction in GHG emissions below 1990 levels, set by EP B-30-15 and codified by SB 32. **Table 4.6-4** summarizes the Projects' consistency with applicable action elements of the 2017 Scoping Plan.

TABLE 4.6-4 - 2017 SCOPING PLAN CONSISTENCY SUMMARY

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	California Public Utility Commission (CPUC), California Energy Commission (CEC) and	**No Conflict**. The Project would use energy from the Imperial Irrigation District (IID). IID has met or exceed the renewable portfolio standard of 33% by 2020.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	California Air Resources Board (CARB)	**No Conflict.** The Project would not interfere with or obstruct IID's energy source diversification effort
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load- serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		**No Conflict.** The Project would be constructed in compliance with current CBC requirements including the 2019 Building and Energy Efficiency Standards and the 2022 California Green Building Standard requirements or those requirements in place at the time individual project components are submitted for design review.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB

TABLE 4.6-4 - 2017 SCOPING PLAN CONSISTENCY SUMMARY

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
		efforts to implement Medium- and Heavy- Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low- NOX standard.		**Not Applicable.** This measure is not related to the project scope.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3 –7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		**No Conflict.** The majority of all project trips would be new trips. If the project triggers a VMT reduction strategy, then one would be prepared as part of the overall traffic impact evaluation process.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**No Conflict.** The project would not exceed the SCAQMD GHG emission standards and would implement all applicable code requirements to reduce GHG emissions as conditions of approval. The project would not conflict with GHG reduction efforts.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF),	**No Conflict.** The project would not conflict with use of adjacent streets by pedestrians, bicycles or transit service provided by Imperial Valley Transit.

TABLE 4.6-4 - 2017 SCOPING PLAN CONSISTENCY SUMMARY

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
	California Transportation Commission (CTC), Caltrans	
By 2019, develop pricing policies to support low-GHG transportation (e.g., low emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, California Transportation Commission (CTC), OPR, SGC, CARB	**Not Applicable.** This measure is not related to the project scope.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, California Natural Resource Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	**No Conflict.** This measure would apply to all trucks accessing the project site. It is presumed that heavy trucks would comprise a small percentage of overall traffic volumes.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is unrelated to the project scope.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**No Conflict.** When adopted, this measure would apply to all fuel sold on site and purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, California Department of Food and Agriculture (CDFA), California State Water Resource Control Board (SWRCB), Local Air Districts	**No Conflict.** The Project would be required to comply with this measure and reduce any Project- source SLPS emissions accordingly. The Project would not obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**No Conflict.** The Project would be required to comply with applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable**. The Project site is not an identified property that needs to be conserved.

TABLE 4.6-4 - 2017 SCOPING PLAN CONSISTENCY SUMMARY

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		**Not applicable**. The entire site is planned for development.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**No Conflict.** To the extent appropriate for the proposed commercial buildings, wood products would be used in construction, including roof structure. Additionally, the Project includes landscaping using native species.t
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Not applicable.** This measure is unrelated to the project scope.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within State Agencies & Local Agencies	**Not applicable.** This measure is unrelated to the project scope.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.		**Not applicable.** This measure is unrelated to the project scope.

Source: ICAPCD, 2017 (Table 4); Birdseye Planning Group, 2025a (Appendix B).

2022 Scoping Plan Consistency CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy ZEV buses and trucks. Additional transportation policies include the Off- Road Zero Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation.

The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential development. These efficiency improvements correspond to reductions in secondary GHG emissions. Energy saving measures, such as Title 24, reduces GHG emissions from the power

generation facilities by reducing load demand. The 2022 Scoping Plan Appendix D provides local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D focuses on Residential and Mixed-Use Projects. The 2022 Scoping Plan Appendix D lists potential actions that support the State's climate goals. However, the 2022 Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features, mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency. As individual phases or components of each phase are submitted for design review, it is anticipated that each would include standard conditions and mitigation measures to reduce construction and operational emissions. For example, the 2022 Scoping Plan's construction actions include enforcing idling time restrictions on construction vehicles and requiring construction vehicles to operate highest tier engines commercially available. The project would include a majority of the feasible operational mitigation measures listed in the 2022 Scoping Plan Appendix D as design features. Some of the recommended operational measures would include providing bicycle parking, creating on- and off-site safety improvements for bike, pedestrian, and transit connections, requiring solar panels, drought-tolerant landscaping, and energy conserving appliances. As discussed above, the Project would be consistent with all applicable plan goals and applicable regulatory programs designed to reduce GHG emissions generated by land use projects.

Further, the Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by California Building Standards Code Title 24 – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. As shown above, the majority of the Project's emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan actions described above. The County has no control over vehicle emissions; however, these emissions would decline in the future because of Statewide measures as well as cleaner technology and fleet turnover. Many State plans and policies would contribute to a reduction in the Project's mobile source emissions, including the following:

CARB's Advanced Clean Truck Regulation: Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero- emission medium-and heavy-duty vehicles from Class 2b to Class 8.

Executive Order N-79-20: Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."

CARB's Mobile Source Strategy: CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.

CARB's Sustainable Freight Action Plan: The Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. This Plan applies to all trucks accessing the Project site and may include existing trucks or new trucks that are part of the Statewide goods movement sector.

CARB's Emissions Reduction Plan for Ports and Goods Movement: CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted.

The Project would not obstruct or interfere with efforts to increase zero emission vehicles (ZEVs) or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100/renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that Project operations would benefit from applicable measures enacted to meet State GHG reduction goals. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Thus, impacts related to consistency with the 2022 Scoping Plan would be less than significant. The Project would not conflict with the applicable plans and regulatory programs that are discussed above; and therefore, with respect to this particular threshold, the Project does not have a significant impact.

As discussed, the Project would exceed 3,000 MT of annual CO2e emissions as stated above per Significance Threshold 1; however, it would be consistent with Connect SoCal RTP/SCS and the 2017 CARB scoping plan and the 2022 Scoping Plan goals intended to reduce overall regional GHG emissions. The Project will not impede or delay local or statewide initiatives to reduce GHG emissions. Impacts would be less than significant.

Design measures implemented by the project per Title 24 of the California Energy Code and Calgreen code intended to reduce overall GHG emissions would also contribute to GHG reduction goals mandated by AB 32 and further address in EO S-3-05 and SB 32. Thus, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.

4.6.6 Mitigation Measures

4.6.6.1. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

In addition to the Project features listed in Table 4.6-1; the Certified EIR identified air quality mitigation measures MM 4.3.1, MM 4.3.2a, 4.3.2b, 4.3.2c, Condition of Approval AQ-1 and MM 4.16 to help reduce GHG emissions from Project construction and operations. As described in Section 4.2, MM 4.3.1 from the Certified EIR has been updated to reflect current ICAPCD current rules, regulation and mitigation.

MM 4.16.1 Obtain and Hold Carbon Credits.

The Master Developer or individual builders shall obtain and hold for the duration of project construction, sufficient carbon credits to fully offset construction-phase GHG emissions ("project carbon offsets"). Prior to completion of project construction, the Applicant shall provide proof of participation in a Carbon Offsets Program, which must be provided to the satisfaction of the Imperial County Air Pollution Control District. The Master Developer or individual builders shall prepare a detailed written summary of the project carbon offsets and proof of compliance shall include quantification of emission reduction. The Master Developer or individual builders shall also provide to the Imperial County Air Pollution Control District an independent verification opinion statement(s), from a verification body registered with the California Climate Action Registry, Chicago Climate Exchange, or the CARB, for the credits to be applied**.**

At project build-out the Master Developer or individual builders shall purchase carbon offsets to offset the project's CO_2e emissions from operations to a less than significance threshold the Applicant shall provide proof of participation in a Carbon Offsets Program, which must be provided to the satisfaction of the Imperial County Air Pollution Control District. The Master Developer or individual builders shall prepare a detailed written summary of the project carbon offsets and proof of compliance shall include quantification of emission reduction. The Master Developer or individual builders shall also provide to the Imperial County Air Pollution Control District an

independent verification opinion statement(s), from a verification body registered with the California Climate Action Registry, Chicago Climate Exchange, or the CARB, for the credits to be applied**.**

The Project applicant is responsible for all costs to determine the emission reductions associated with the projects.

Timing/Implementation: *Prior to recordation of final map.*

Enforcement/Monitoring: *Imperial County Air Pollution Control District.*

4.6.6.2. Newly Proposed Mitigation Measures

No additional mitigation measures beyond those required in the previously approved FEIR are necessary.

4.6.7 Level of Significance After Mitigation

With implementation of mitigation measures MM 4.3.1, MM 4.3.2a, MM 4.3.2b, MM 4.3.2c and Condition of Approval AQ-1, the Project would not conflict with any applicable plan, policy or regulation of an agency for the purpose of reducing greenhouse gases it’s contribution to GHG emissions would be less than cumulatively considerable.

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4.7. Land Use and Planning

4.7.1. Introduction

This section provides the supplemental analysis required to assess potential land use and planning impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment. It also compares land use and planning impacts from the proposed Project to those that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) as identified in the Certified EIR.

The following discussion addresses the existing conditions within the McCabe Ranch II Specific Plan Area, identifies applicable regulations, and assesses the proposed Project's consistency with applicable plans and policies. This section also identifies specific and detailed measures from the Certified EIR that apply to the Project, or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse land use and planning impacts.

Information used in preparing this section and in the evaluation of potential land use and planning impacts to biological resources was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037). Additionally, applicable planning documents, including the Imperial County General Plan and the County Land Use Ordinance

4.7.2. Summary of Certified EIR Findings

Potential land use and planning impacts associated with development within the McCabe Ranch II Specific Plan area were evaluated in the Certified EIR. The Certified EIR found McCabe Ranch II Specific Plan to be compatible with the applicable planning documents, including the Imperial County General Plan and the County Land Use Ordinance. The Certified EIR also found that the Specific Plan policies shown on **Table 4.7-1** include specific, enforceable requirements and/or restrictions and corresponding performance standards to ensure consistency with applicable plans and reduce potential land use incompatibilities.

TABLE 4.7-1. MCCABE RANCH II SPECIFIC PLAN LAND USE POLICIES

Policy No.	McCabe Ranch II Specific Plan Land Use Policies
Policy LU-1	Implement the Specific Plan to address land use mix, design features, parking, pedestrian movement, traffic and circulation, and open space interconnectedness.
Policy LU-2	To encourage communication between the County, nearby cities of Imperial and El Centro and the community of to ensure the opportunity to comment on actions having cross-border implications. To address other community interface issues, including land use compatibility, circulation and access, and development standards.

TABLE 4.7-1. MCCABE RANCH II SPECIFIC PLAN LAND USE POLICIES

Policy No.	McCabe Ranch II Specific Plan Land Use Policies
Policy LU-3	The Specific Plan will buffer residential areas from land use impacts of adjacent non-residential land uses through the use of landscaping, soundwalls, berms, fencing, open space setbacks, terrain features, greenbelts, building orientation and/or other similar techniques.
Policy LU-4	Review subsequent development proposals for residential development for compatibility with the character and scale of nearby neighborhoods, while providing a variety of densities and housing types as reflected by the Land Use Plan Designations of the Specific Plan.
Policy LU-5	The Specific Plan will buffer residential land uses locating adjacent to nonresidential land uses through the use of landscaping, soundwalls, berms, fencing, open space setbacks, terrain features, greenbelts, building orientation, and/or other similar techniques.
Policy LU-6	The Specific Plan will restrict single family residential units proposed to be located adjacent to non-residential land uses to a single story where appropriate.
Policy LU-7	The Specific Plan will allow a variety of compatible commercial, service and residential uses that will contribute to an active pedestrian environment. That can be made compatible through the use of landscaping, soundwalls, berms, fencing, open space setbacks, terrain features, greenbelts, building orientation and/or other similar techniques.
Policy LU-8	All future development proposals to submit project plans and specifications to the County of Imperial Department of Planning and Development Services, as well as to the County of Imperial Department of Public Works. These future development proposals would undergo departmental review for consistency with the County's standards prior to issuance of applicable grading, building, or occupancy permits, as determined on a project-specific basis by the County.

Source: McCabe Ranch Realty, 2025. Proposed Amendment to McCabe Ranch II Specific Plan.

Scoping Issues Addressed

During the scoping period for the proposed Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. No comments related to land use and planning were received.

4.7.3. Environmental Setting

The proposed McCabe Ranch II Tract Map 994 Project site includes approximately 351.2-acre portion of the 468-acre McCabe Ranch II Specific Plan Area (Specific Plan Area). The Specific Plan area is approximately 468 acres in size and is currently in multiple ownerships. McCabe Ranch Realty LLC is under ownership contract with the current owner, Tierra Partners LLC, of approximately 345 acres of the 468-acre total, consisting of APNs 054-130-078, 054-130-072, 054-130-077, and 054-130-076. The properties identified as APNs 054-130-079 and 054-130-042 are held in separate ownerships.

The Specific Plan Area consists of generally flat terrain with very gently topography sloping to the northwest. The site elevation is approximately 19 to 23 feet below mean sea level (msl). The area is under various phases of active cultivation with agricultural crops and contains canals and drains that are utilized to transport water to and from the agricultural fields. One lateral canal (the Dogwood lateral) and one drain (Date Drain #3) traverse the area in a north-south direction. Adjacent to Date Drain #3 is an above ground utility line owned by the Imperial Irrigation District that generally serves the area. Adjacent to both sides of the canal are unpaved access roads. The Date Drain #3-A runs in an east-west direction through the western half of the site in the approximate alignment of Black Hills Road.

Surrounding land uses include agricultural lands to the east and west of the Project site. There are several scattered single family residential structures to the northwest, northeast, and west. The residential subdivision known as "McCabe Ranch I Specific Plan" abuts the Project site on the south and east, and there is a small cluster of homes located along McCabe Road. The Heber Essential Services Facility housing, the Heber Public Utility District (HPUD), and the County Fire Department are located approximately one mile to the south along the east side of Dogwood Road. HPUD's water treatment plant is located east and south of the Heber Essentials Facility

Existing land uses on and surrounding the Project site are presented on T**able 4.7-2**.

TABLE 4.7-2: EXISTING LAND USES, ZONE CLASSIFICATION AND GENERAL PLAN DESIGNATION

Direction	Existing Land Uses	Zoning	General Plan
Project Site	Agriculture	Mc Ra 2 SPA	Specific Plan
North	Agriculture and Residential	A-1-U and A-2-U	Urban Area
South	Agriculture and Residential	A-2-G-SPA	Specific Plan
East	Agriculture	A-2-SPA	Specific Plan
West	Agriculture	A-2	Agriculture

4.7.4. Regulatory Setting

State

Cortese-Knox-Hetzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Cortese-Knox-Hertzberg Act; California Government Code Section 56000 et seq.) establishes procedures for local government changes of organizations, including annexations into a special district. The Cortese-Knox-Hertzberg Act delegates these processes to Local Agency Formation Commissions (LAFCOs). A LAFCO is a state agency that performs growth management functions, and has approval authority regarding the establishment, expansion, reorganization, and elimination of any

city and most types of special districts. LAFCOs establish spheres of influence (SOIs) for cities and special districts. A "sphere of influence" refers to the physical boundary and service area that a local governmental agency is expected to serve. It is necessary to establish this boundary to determine which governmental agencies can provide efficient services to the people and property in a given area. The sphere of influence requirement also aims to discourage urban sprawl by preventing overlapping jurisdictions and duplication of services.

In addition to the Cortese-Knox-Hertzberg Act, the Imperial County LAFCO has adopted the *Guide to the Policies, Standards and Procedures to Implement the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000* (2013 Edition). The purpose of this Guide is to establish clear procedures and policies by which the Imperial LAFCO conducts business.

Regional

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project Site is within SCAG's regional authority (SCAG, 2018, p. ES-1). In April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities

Strategy (SCS) ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP (SCAG, 2024). Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill (SB) 375 which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

Local

Imperial County General Plan

The purpose of the Imperial County General Plan is to guide growth throughout the County. Urban development is directed to areas where public infrastructure can be readily extended to areas with limited health and safety hazards. Likewise, development should avoid natural, cultural, and economic resources.

The General Plan includes ten elements: Agricultural; Circulation and Scenic Highways; Conservation and Open Space; Housing; Land Use; Noise; Parks; Renewable Energy and Transmission; Seismic and Public Safety; and Water. As of the date of publication of the SEIR, the County's first Environmental Justice Element was being prepared. These elements satisfy the California Government Code requirements for general plan elements. Each element includes goals, objectives, and implementing policies and programs. Relevant County of Imperial General Plan policies related to land use are provided below. **Table 4.7-3** summarizes the Project's consistency with the County's General Plan policies.

While this EIR analyzes the project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

Imperial County Land Use Ordinance – Title 9

The County of Imperial Land Use Ordinance (Title 9) provides the physical land use planning criteria, development standards, and zoning regulations for development in the unincorporated areas of the County. Title 9 specifies permitted and conditional uses for the various zoning designations within unincorporated areas of the County. Development and performance standards included in Title 9 are adopted to protect the health, safety, and general well-being of the public through the orderly regulation of land uses within the County.

TABLE 4.7-3: CONSISTENCY WITH GENERAL PLAN LAND USE GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Land Use Element (LUE) (a)		
LUE Objective 1.2: Discourage the location of incompatible development adjacent to or within productive agricultural lands.	Yes	The long-range vision for Imperial County involves non-agricultural development in the corridor between State Route (SR) 86 and SR 111. The proposed project is consistent with the General Plan designation for urban development. The majority of land outside of the SR 86/SR 111 corridor would continue to serve agricultural uses.

TABLE 4.7-3: CONSISTENCY WITH GENERAL PLAN LAND USE GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
LUE Goal 2: Diversify employment and economic opportunities in the County while preserving agricultural activity.	Yes	The proposed Project is located in an urbanizing area between SR 86 and SR 111 that has been identified for future development. The Project would result in new commercial and institutional uses, creating new employment and economic opportunities.
LUE Objective 2.1: Achieve a balanced and diversified local economy with a variety of economic and employment opportunities.	Yes	The project would result in new commercial and institutional uses, creating new employment and economic opportunities.
LUE Goal 3: Achieve balanced economic and residential growth while preserving the unique natural, scenic, and agricultural resources of Imperial County.	Yes	The proposed Project includes mitigation measures that reduce impacts on natural resources to below a level of significance. No impacts to scenic or agricultural resources would occur.
LUE Goal 9: Identify and preserve significant natural, cultural, and community character resources and the County's air and water quality.	Yes	The Project includes mitigation measures to reduce significant impacts to below a level of significance. No significant aesthetic/community character resources occur within the project vicinity
LUE Objective 9.6: Incorporate the strategies of the Imperial County Air Quality Attainment Plan (AQAP) in land use planning decisions and as amended. **LUE Objective 9.7:** Implement a review procedure for land use planning and discretionary project review which includes the Imperial County Air Pollution Control District.	Yes	The Air Quality Report for the Project includes an evaluation of the Project's consistency with the AQAP. The AQAP includes the rules and regulations promulgated by the ICAPCD that are applicable to land use projects in Imperial County. The proposed Project must comply with applicable ICAPCD rules and regulations, either through project design or inclusion of mitigation, to qualify for the necessary permits to implement construction and operation (See mitigation measures in Section 4.2 of this Supplemental EIR). The Imperial County Air Pollution Control District is identified as a Responsible Agency for the proposed project and as such is included in the discretionary review of the proposed Project.
Circulation and Scenic Highways Element (CSHE) (b)		
CSHE Goal 1: The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment. **CSHE Objective 1.2.** Require a traffic analysis for any new development which may have a significant impact on County roads.	Yes	A Limited Mobility Analysis has been prepared for the Project, which evaluated project-related impacts on intersections and street segment in the vicinity of the SPA. The LMA also identified improvements /mitigation measures that are consistent with County and Caltrans' standards, as needed (Appendix G).

TABLE 4.7-3: CONSISTENCY WITH GENERAL PLAN LAND USE GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
CSHE Objective 1.3. Ensure safe and coordinated traffic patterns, contiguous growth, and promote a planned and consistent development around city/township areas. Require that coordination with other jurisdictions, including the cities and CALTRANS results in a coordinated system that is consistent in classification, R/W and improvement standards. When annexations are proposed, projects must provide consistent roadway standards. This is intended to "throughways" that allow for the flow of traffic at LOS "C" or better throughout the system, both in cities as well as the County.		
CSHE Objective 1.5. Encourage the balance of employment, services, and housing throughout the County to preclude future traffic congestion. The result of balancing housing and employment demands at a community scale allows residents to live and work in the same area, potentially decreasing demand on inter-regional transportation facilities.	Yes	The proposed McCabe Ranch II TM 994 and Specific Plan Amendment includes a mixture of residential, commercial and business park uses that
CSHE Objective 1.11. Improve County circulation system roadways in concert with land development to ensure sufficient levels of service.	Yes	The Local Mobility Analysis identified circulation system improvements required for each phase of development (see Section 4.10.6) of this SEIR.
CSHE Objective 1.12. Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on existing roadways and intersection to a level of service (LOS) worse than "C" without providing appropriate mitigations to existing infrastructure.	Yes	Implementation of Mitigation Measure 4.14.6, Provide Required Off-Street Parking, will ensure that any subsequent development within the McCabe Ranch II Specific Plan area will provide off-street parking spaces in accordance with the Imperial County Code of Ordinances, Section 90402.01.

Source: (a) County of Imperial Land Use Element, 2015.
(b) County of Imperial Circulation and Scenic Highway Element, 2008.

Imperial County Airport Land Use Compatibility Plan

The *Airport Land Use Compatibility Plan for Imperial County Airports* (as amended 1996), sets forth the criteria and policies which the Imperial County Airport Land Use Commission (ALUC) uses in assessing the compatibility between the principal airports in the County and proposed land use development in the areas surrounding them (Imperial County, 1996). The emphasis of the Airport Land Use Compatibility Plan (ALUCP) is on the review of local general and specific plans and specifically pertains to the six (6) existing publicly owned airports in the County and the Naval

Air Facility El Centro. An update to the ALUCP was undertaken in 2024 and a *Draft Airport Land Use Compatibility Plan Update* was published in June 2025. Once approved, the ALUCP Update will replace the 1996 ALUCP.

Any proposal by a county or city to adopt a general plan or specific plan must be referred to the Airport Land Use Commission (ALUC) for review if the boundaries of the general or specific plan encompass the influence area of a public-use airport. Amendments to such plans also must be referred to the ALUC, which must take place prior to the local jurisdiction's action to adopt or amend the plan (California Public Utilities Code Section 21676(b)). The two public use airports nearest the SPA are the Imperial County Airport and the Calexico International Airport. The Imperial County Airport, also known as the Boley Field, is located in the City of Imperial approximately six (6) miles northwest of the Project site on SR-86. The Imperial County Airport is primarily a general aviation facility but is served by one commercial airline (County of Imperial, 1996). The Calexico International Airport, a general aviation facility, is located in the City of Calexico approximately eight (8) miles south of the Project site near the U.S.-Mexico Border, west of SR-111 (County of Imperial, 1996).

The Project site is not located within the Airport Influence Area (AIA) of either airport as identified in the ALUCP (County of Imperial, 1996). However, the proposed Project would exceed $500,000 in cost and therefore review by the Airport Land Use Commission would be required.

4.7.5. Thresholds of Significance

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. Physically divide an established community.
2. 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.

4.7.6. Analysis of Project Effects and Significance Determination

Impact 4.7-1: Would the Project result in the physical division of an Established Community?

Summary of Certified EIR Findings

Potential land use and planning impacts associated with development within the McCabe Ranch II Specific Plan area were evaluated in the Certified EIR. The Certified EIR found that the McCabe Ranch II Specific Plan would not cause the physical division of an established community. and would be compatible with the applicable planning documents, including the Imperial County General Plan and the County Land Use Ordinance. The Certified EIR also found that the Specific Plan policies LU-1 through LU-8 (see **Table 4.7-1)** include specific, enforceable requirements

and/or restrictions and corresponding performance standards to ensure consistency with applicable plans and reduce potential land use incompatibilities.

Proposed Project Impact Analysis

The proposed Project includes a Tract Map for development of a portion of the McCabe Ranch II Specific Plan area with residential, recreation, parks and school uses along with an amendment to the adopted McCabe Ranch II Specific Plan. This project would be developed within an area currently used for agriculture and approved for development of the Specific Plan.

The proposed Project would not change the proposed footprint, land use types or land use densities of the adopted McCabe Ranch II Specific Plan and therefore, and would not result in the division of an established community. Further, the Project would result in land use and planning impacts that would be consistent with those evaluated in the Certified EIR . Impacts under this criteria would be less than significant.

Impact 4.7-2: Would the Project result in significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Summary of Certified EIR Findings

The Certified EIR found that the McCabe Ranch II Specific Plan would be compatible with the Imperial County General Plan and the County Land Use Ordinance. The Certified EIR also found that the Specific Plan Policies LU-1 through LU-8 (see **Table 4.7-1**) include specific, enforceable requirements and/or restrictions and corresponding performance standards to ensure consistency with applicable plans and reduce potential land use incompatibilities.

Proposed Project Impact Analysis

Project Consistency with Imperial County General Plan

An analysis of the project's consistency with the General Plan goals and objectives relevant to the project is provided in **Table 4.7-2**, Consistency with General Plan Land Use Goals and Objectives. While **Table 4.7-2** demonstrates the project's consistency applicable goals and objectives of both the Land Use Element and the Circulation and Scenic Highway Element of the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Planning Commission and Board of Supervisors retain ultimate authority for the determination of the project's consistency with the General Plan.

Project Consistency with Imperial County Airport Land Use Compatibility Plan

The Project is not located within the AIA of either the Imperial County or Calexico public airport. For this reason, the proposed Project would be not be subject to, and would not conflict with the

Imperial County's Airport Land Use Compatibility Plan (County of Imperial, 1996). No significant impact would occur.

Project Consistency with SCAG's 2024-2050 RTP/SCS

As previously noted, in April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) ("RTP/SCS"); also referred to herein as "Connect SoCal 2024." The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of the RTP/SCS is presented on Table 4.7- 4, Analysis of Consistency with SCAG Draft 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Goals. As indicated the Project would not conflict with any of the RTP/SCS goals, and no impact would occur. Additionally, while some of the Policy Planning Statements are intended to be implemented by SCAG on a regional level, the proposed Project nonetheless includes features which are consistent with these policies.

4.7.7. Mitigation Measures

4.7.7.4 Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Specific Plan Policies LU-1 through LU-8 would ensure the Project would not result is significance land use and planning impacts. No additional mitigation is required.

4.7.8. Level of Significance After Mitigation

No significant land use and planning impacts would occur with implementation of the proposed Project. No mitigation is required.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
MOBILITY		
System Preservation and Resilience		
01.	Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
02.	Promote transportation investments that advance progress toward the achievement of asset management targets, including the condition of the National Highway System pavement and	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
	bridges, and transit access (rolling stock, equipment, facilities, and infrastructure)	
	Complete Streets	
03.	Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	**Consistent.** As part of the Project, the Project Applicant(s) would accommodate improvements to SR-86, McCabe Road, and Dogwood Road adjacent to the Project site and would also install pedestrian sidewalks/connectors throughout the McCabe Ranch II Specific Plan Area. These improvements would promote non-vehicular modes of transportation in the local areas.
04.	Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project. Nevertheless, the infrastructure improvements included in the Project, as well as the intersection and street segment improvements/mitigation measures identified in Section 4.10.6 of the SEIR, ensures the implementation of Complete Streets.
05.	Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
06.	Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety, and access to opportunities.	**Not Applicable.** The McCabe Ranch II Specific Plan is not located with the boundaries of a "Priority Equity Community," as defined in the Connect SoCal 2024 Plan.
	Transit and Multimodal Integration	
07.	Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility, and safety.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
08.	Support connections across the public, private and nonprofit sectors to develop transportation projects and programs that result in improved connectivity.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
09.	Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project. The proposed Project includes a mix of residential and employment uses within the SPA and therefore, would be consistent with this policy.
10.	Support the implementation of transportation projects in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety, and access to opportunities.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
11.	Create a resilient transportation system by preparing for emergencies and the impacts of climate change.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Transportation System Management		
12.	Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
13.	Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Transportation Demand Management		
14.	Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.)	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
15.	Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
16.	Encourage municipalities to update existing (legacy) TDM ordinances by incorporating new travel modes and new technology and by incorporating employment and residential sites of certain populations – for example, employers who have less than 250 employees (below the 250 or more employees threshold identified in AQMD's Rule 2202).	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
Technology Integration		
17.	Support the implementation of technology designed to provide equal access to mobility, employment, economic opportunity, education, health and other quality-of-life opportunities for all residents within the SCAG region	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
18.	Advocate for data sharing between the public and private sectors to effectively evaluate the services' benefits and impacts on communities while protecting data security and privacy	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
19.	Advocate for technology that is adaptive and responsive to ensure it remains up to date and meets the evolving needs of users and stakeholders	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
20.	Promote technology that has the capacity to facilitate economic growth, improve workforce development opportunities, and enhance safety and security	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
21	Proactively monitor and plan for the development, deployment and commercialization of new technology as it relates to integration with transportation infrastructure	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Safety		
22.	Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
23.	Integrate the assessment of equity into the regional transportation safety and security planning process, focusing on the analysis and mitigation of disproportionate impacts on disadvantaged communities	**Consistent.** As noted in Section 4.5 of the SEIR, the proposed Project would not result in significant adverse environmental justice impacts.
24.	Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
25.	Support the use of transportation safety and system security data in investment decision-making, including consideration of new highway and transit/rail investments that would address safety and security needs.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Funding the System/User Fees		
26.	Promote stability and sustainability for core state and federal transportation funding sources	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
27.	Establish a user fee–based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and represents equitable distribution of costs and benefits	**Not Applicable**. RTP/SCS Policy 27 provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project. Additionally, the Project's Traffic Analysis (SEIR *Technical Appendix G2*) identifies improvements, fair share contributions, and fee contributions to the County's DIF programs, which would ensure that all study area intersections would operate at an acceptable Level of Service (LOS).
28.	Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
29.	Promote national and state programs that include return-to-source guarantees while maintaining the flexibility to reward regions that continue to commit substantial local resources.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
30.	Leverage locally available funding with innovative financing tools to attract private capital and accelerate project delivery	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
31.	Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability and resilience	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
	Communities	
	Priority Development Areas	
32.	Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
33.	Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
34	Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
Housing the Region		
35.	Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region	**Consistent.** A total of 2,300 single and multiple-family residences are planned in the adopted McCabe Ranch II Specific Plan which would develop housing in an area with access to important resources and amenities and increase housing access across the region.
36.	Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	**Consistent.** A total of 2,300 single and multiple-family residences are planned in the adopted McCabe Ranch II Specific Plan, which would increase housing opportunities and implement housing development that could support future transit in the local area. Additionally, the McCabe Ranch II Specific Plan area is planned as a walkable community with a mix of supporting uses, including on-site elementary and middle school sites as well as community and neighborhood park facilities. The SPA is also located within one-half miles of the Imperial Valley Mall and Mall transit substation. This puts these amenities and transit services within easy reach, promoting a healthier and more connected community.
37.	Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	**Consistent.** A total of 2,300 single and multiple-family residences are planned in the adopted McCabe Ranch II Specific Plan, which would increase housing opportunities in the local area, which would contribute to meeting additional housing needs in the region.
38.	Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
39.	Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
40.	Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
	communities with the greatest needs and vulnerabilities	
41.	Support efforts to increase housing and services for people experiencing homelessness across the region.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
15-Minute Communities		
42.	Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses	**Consistent.** A total of 2,300 single and multiple-family residences are planned in the adopted McCabe Ranch II Specific Plan, which would increase housing opportunities in the local area and would establish development intensities that could support future transit in the local area.
43.	Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
44.	Encourage efforts that elevate innovative approaches to increasing access to neighborhood destinations and amenities through an array of people-centered mobility options	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Equitable Engagement and Decision-Making		
45.	Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
46.	Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
47.	Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in the planning process.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Environment		

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
Sustainable Development		
48.	Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience	**Consistent.** As presented throughout this SEIR, the Project's impacts to the environment would be less than significant or would be reduced to the maximum feasible extent with the implementation of mitigation measures. Additionally, the analysis presented in SEIR Subsection 4.5, *Energy,* with mandatory compliance with applicable federal and State regulations and requirements, including the provisions of the Title 24 Building Energy Standards, Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy.
49.	Support communities across the region to advance innovative sustainable development practices	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
50.	Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Air Quality		
51.	Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	**Consistent.** As evaluated herein and in EIR Subsections 4.2, *Air Quality,* and 4.6, *Greenhouse Gas Emissions,* mitigation measures have been imposed on the Project to reduce the Project's air quality and GHG emissions to less-than-significant levels.
52.	Support investments that reduce hazardous air pollutants and greenhouse gas emissions	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
53.	Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Clean Transportation		
54.	Accelerate the deployment of a zero- emission transportation system and use near-zero-emission technology to offer short-term benefits where	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
	zero- emissions solutions are not yet feasible or commercially viable	
55.	Promote equitable use of and access to clean transportation technologies so that all may benefit from them	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
56.	Consider the full environmental life cycle of clean transportation technologies, including upstream production and end of life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning and achievement of equity	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
57.	Maintain a technology-neutral approach in the study of, advancement of and investment in clean transportation technology	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Natural and Agricultural Lands Preservation		
58.	Prioritize the climate mitigation, adaptation, resilience and economic benefits of natural and agricultural lands in the region	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
59.	Support conservation of habitats that are prone to hazards exacerbated by climate change, such as wildfires and flooding	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
60.	Support regional conservation planning and collaboration across the region	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
61.	Encourage the protection and restoration of natural habitat and wildlife corridors	**Not Applicable.** RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project. Additionally, as evaluated in EIR Subsection 4.4, *Biological Resources*, mitigation measures have been imposed on the Project to reduce the Project's impacts to biological resources to below a level of significance.
62.	Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy	**Not Applicable**. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project. In addition, the Project site is located in an area that is planned for future development under the adopted McCabe Ranch II Specific Plan.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
63.	Encourage policy development of the link between natural and agricultural conservation with public health	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Climate Resilience		
64.	Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
65.	Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
66.	Support nature-based solutions to increase regional resilience of the natural and built environment	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
67.	Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
68.	Support an integrated planning approach to help local jurisdictions meet housing production needs in a drier environment	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Economy		
Goods Movement		
69.	Leverage and prioritize investments, particularly where there are mutual co- benefits to both freight and passenger/commuter rail	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
70	Goal Statement Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
71.	Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
72.	Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
73.	Ensure continued, significant investment in a safe, secure, clean and efficient transportation system – including both highways and rail – to support the intermodal movement of goods across the region	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Broadband		
74.	Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
75.	Develop networks that are efficient, scalable, resilient and sustainable to support transportation systems management, operations services and "tele-everything" strategies that reduce vehicle miles traveled, optimize efficiency and accommodate future growth of regional economies	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
76.	Encourage investments that provide access to digital activities that support educational, financial and economic growth	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
77	Advocate for current, accurate data to identify opportunity zones and solutions that support the development of broadband services to community anchor institutions and local businesses	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
78.	Promote an atmosphere that allows for healthy competition and speed-driven innovative solutions while remaining technologically neutral.	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
79.	Use a bottom-up approach to identify and support a community's broadband needs	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Universal Basic Mobility		
80.	Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
81.	Promote increased payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Workforce Development		
82.	Foster a positive business climate by promoting regional collaboration in workforce and	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional

TABLE 4.7-4. ANALYSIS OF CONSISTENCY WITH SCAG 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY GOALS

RTP/SCS Policy No.	Planing Policy Statement	Project Consistency Discussion
	economic development between cities, counties, educational institutions and employers	agency staff and decision makers, and is not applicable to the proposed Project.
83.	Encourage inclusive workforce development that promotes upward economic mobility	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
84.	Support entrepreneurial growth with a focus on underrepresented communities	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
85.	Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances and climate change)	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
86	Inform and facilitate data-driven decision-making about the region's workforce	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
Tourism		
87.	Consult and collaborate with state, county and local agencies within the region that are charged with promoting tourism and transportation	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.
88.	Encourage the reduced use of cars by visitors to the region by working with state, county and local agencies (e.g., park services, transportation agencies) to highlight and increase access to alternative options, including transit, passenger rail and active transportation	**Not Applicable.** This RTP/SCS Policy provides direction to County and regional agency staff and decision makers, and is not applicable to the proposed Project.

Source: SCAG, 2024.

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4.8. Noise

4.8.1 Introduction

This section provides the supplemental analysis required to assess potential noise and vibration impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment. It also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR.

This section describes the existing noise environment within and around the McCabe Specific Plan Area, and describes the regulatory framework for the regulation of noise and vibrations. This section also identifies specific and detailed measures from the Certified EIR that apply to the Project, or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse noise and vibration impacts during construction and operation.

Information used in preparing this section and in the evaluation of potential land use and planning impacts to biological resources was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037). Information was also derived from the *Noise Study for the McCabe Ranch II TM 994 and Specific Plan Amendment* prepared by Birdseye Planning Group (Birdseye, 2025c) provided in Appendix E.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. The following issues related to noise were raised by the CDFW and Caltrans are addressed in this section:

- Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-86.
- Discuss potential noise impacts on biological resources.

4.8.2 Summary of Certified EIR Findings

Potential noise and vibration impacts associated with construction and operation of developments included in the McCabe Ranch II Specific Plan were evaluated in Section 4.10 of the Certified EIR. The Certified EIR found that implementation of the McCabe Ranch II Specific Plan could result in construction and operational noise levels that exceed Imperial County standards from construction activities. Implementation of the Specific Plan could also result in significant ground-borne vibration impacts. The Certified EIR identified mitigation measures under the following three (3) general categories to reduce construction and operational noise and ground-borne vibration impacts to below a level of significance:

- Construction Noise Management: MM 4.10.1a, MM 4.10.1b, and MM 4.10.1c
- Site Specific Noise Analyses: MM 4.10.3a, MM 4.10.3b, MM 4.10.4, MM 4.10.5, MM 4.10.7, MM 4.10.8, and MM 4.10.9
- Vibration Studies/Plans: MM 4.10.10a , MM 4.10.10b, and MM 4.10.10c

4.8.3 Environmental Setting

The McCabe Ranch II Tract Map 994 Project site is an approximately 351.2-acre portion of the 468-acre McCabe Ranch II Specific Plan Area (Specific Plan Area). The Specific Plan area is approximately 468 acres in size and is currently in multiple ownerships. McCabe Ranch Realty LLC is under ownership contract with the current owner, Tierra Partners LLC, of approximately 345 acres of the 468-acre total, consisting of APNs 054-130-078, 054-130-072, 054-130-077, and 054-130-076. The properties identified as APNs 054-130-079 and 054-130-042 are held in separate ownerships.

McCabe Ranch II Specific Plan Area

The McCabe Ranch II Specific Plan Area (SPA) is surrounded by agricultural land to the east and west. There are several scattered single-family residential structures to the northwest, northeast, and west of the project site, including a small cluster of homes located along McCabe Road in the northeastern portion of the Project site. As stated, the Union Pacific Railroad Line is located northeast of the Project site. The single-family residential subdivision known as McCabe Ranch I Specific Plan abuts the SPA on the southeast north of Correll Road and west of Dogwood Road. Additionally, agricultural land is located south, east, and west of the SPA.

The two public use airports nearest the SPA are the Imperial County Airport and the Calexico International Airport. The Imperial County Airport, also known as the Boley Field, is located in the City of Imperial approximately six (6) miles northwest of the Project site on SR-86. The Imperial County Airport is primarily a general aviation facility but is served by one commercial airline (County of Imperial, 1996). The Calexico International Airport, a general aviation facility, is located in the City of Calexico approximately eight (8) miles south of the Project site near the U.S.-Mexico Border, west of SR-111 (County of Imperial, 1996). Because the Project site is not located within two miles of a public airport, peoples residing or working in the area would not be exposed to excessive noise levels. This issue will not be further discussed in this Draft SEIR.

Overview of Sound Measurement

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be

consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged to be twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations. Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (i.e., industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The way older homes in California were constructed (approximately 30 years old or older) generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units and office buildings construction to California Energy Code standards is generally 30 dBA or more.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be annoying). Typically, equivalent continuous sound level (Leq) is summed over a one-hour period. Lmax is the highest root mean squared (RMS) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period. The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 PM to 7 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL are also met.

4.8.3.1. Existing Noise Sources

The McCabe Ranch II Specific Plan Area is located within an urbanizing area within unincorporated Imperial County and located south of Interstate 8/SR-86 interchange and the City of El Centro. It is

generally bordered by SR-86 to the west, West McCabe Road to the north, Dogwood Road to the east and Correll Road (if extended) to the south. The most common and primary sources of noise in the vicinity are motor vehicles (e.g., automobiles and trucks) operating on SR-86, McCabe Ranch Road and Dogwood Road as well as the operation of agricultural equipment.

Aircraft overflights occur but do not noticeably contribute to the ambient noise environment.

Train noise is generated along the Union Pacific Railroad (UPRR) rail line, which is located approximately 130 feet east of the McCabe Ranch Road/Dogwood Road intersection and runs northwest to southeast.

The Specific Plan Area is within a noise impact zone, as defined by the Imperial County General Plan, Noise Element, because it meets the following criteria:

- Within 750 feet of the centerline of any railroad; and
- Within 1,320 feet of existing farmland which is in an agricultural zone.

To obtain ambient noise levels, noise measurements were taken on April 11, 2024. The location of the noise monitoring sites is shown on **Figure 4.8-1**, Ambient Noise Monitoring Locations and the measured Leq at each location is shown on **Table 4.8-1**. As shown on **Table 4.8-1**, ambient noise levels ranged from 49.2 dBA Leq at Measurement Site 3 to 67.6 dBA (Leq) at Measurement Site 2.

TABLE 4.8-1: AMBIENT NOISE MONITORING RESULTS

Measurement Locations		Primary Noise Source	Sample Time	Ex. Noise Level Leq (dBA)
Site 1.	Southeast corner of McCabe Ranch Road and SR-86.	Traffic	Weekday morning	66.6
Site 2.	SR-86 and Proposed Main Entry Parkway.	Traffic	Weekday morning	67.6
Site 3.	Western terminus of Correl Road.	Traffic	Weekday morning	49.2
Site 4.	Intersection of Black Hills Road and Dogwood Road.	Traffic	Weekday morning	66.8
Site 5.	Intersection of McCabe Ranch Road and Dogwood Road.	Traffic	Weekday morning	60.6
Site 6.	Intersection of McCabe Ranch Road and Farnsworth Road.	Traffic	Weekday morning	62.2

Source: Birdseye Planning Group, 2025c (Appendix E).

The 15-minute measurements were taking using an ANSI Type II integrating sound level meter. The predominant noise source was traffic. The temperature during monitoring ranged from 65 to 76 degrees Fahrenheit with no cloud cover or perceptible wind.

4.8.4 Regulatory Setting

4.8.4.1. Federal

The Federal Noise Control Act (1972) addressed the issue of noise as a threat to human health and welfare. To implement the Federal Noise Control Act, the U.S. Environmental Protection Agency (EPA) undertook a number of studies related to community noise in the 1970s. The EPA found that 24-hour averaged noise levels less than 70 dBA would avoid measurable hearing loss, levels of less than 55 dBA outdoors and 45 dBA indoors would prevent activity interference and annoyance (EPA 1972).

The U.S. Department of Housing and Urban Development (HUD) published a Noise Guidebook for use in implementing the HUD's noise policy. In general, HUD's goal is exterior noise levels that are less than or equal to 55 dBA Ldn. The goal for interior noise levels is 45 dBA Ldn. HUD suggests that attenuation be employed to achieve this level, where feasible, with a special focus on sensitive areas of homes, such as bedrooms (HUD 2009).

4.8.4.2. State

Title 24 of the California Code of Regulations (CCR) establishes standards governing interior noise levels that apply to all new single-family and multi-family residential units in California. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 as an upper limit on interior noise in all residential units.

In addition, the State of California General Plan Guidelines, provides guidance for noise compatibility. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

4.8.4.3. Local

Noise Standards

Construction Noise. Construction noise, from a single piece of equipment or a combination of equipment, shall not exceed 75 dB Leq when averaged over an 8-hour period, and measured at the

nearest sensitive receptor. This standard assumes a construction period, relative to an individual receptor of days or weeks.

The Noise Element of the County of Imperial General Plan (2015) defines a construction noise impact as noise generated from a single piece of construction equipment or a combination of equipment that exceeds 75 dBA Leq when averaged over an 8-hour period (Leq[8]) and measured at the nearest sensitive receptor (e.g., homes, schools, hospitals, parks, and office buildings, and for certain non-human species, including riparian bird species).

The Noise Element also limits construction equipment operation to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction operations are permitted on Sundays or holidays.

Operational Noise. The Property Line Noise Limits listed in Table 7 of the County of Imperial General Plan Noise Element and the County's Ordinance, Title 9, Division 7 (Noise Abatement and Control) Section 90702.00 Subsection A provides the following acceptable Sound Level limits based on the property zoning.

PROPERTY LINE SOUND LEVEL LIMITS

Land Use Zone	Time of Day	One Hour Average Sound Level (decibels)
1. Residential: All R-1	7 a.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
2. Residential: All R-2	7 a.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
3. Residential: R-3, R-4 and all other Residential	7 a.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
4. All commercial	7 a.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	55
5. Manufacturing, all other industrial, including agricultural and extraction industry	(anytime)	70
6. General industrial	(anytime)	75

Source: Imperial County Code of Ordinances Section 90702.00 (A).
Imperial County General Plan 2015 Noise Element, Table 7.

Stationary Noise. The applicable property line sound level limits provided above shall apply to noise generation from one property to an adjacent property. The standards imply the existence of a sensitive receptor on the adjacent, or receiving, property. In the absence of a sensitive receptor, an exception or variance to the standards may be appropriate. These standards do not apply to

construction noise. Stationary sources associated with the project (i.e., heating, ventilation and air conditioning [HVAC]) would have an adverse effect if they exceed baseline conditions at receiving properties.

The increase in noise levels generally results in an adverse impact to the noise environment. The Noise/Land Use Compatibility Guidelines are not intended to allow the increase of ambient noise levels up to the maximum without consideration of feasible noise reduction measures.

Traffic Noise. The Imperial County General Plan Noise Element (2015) (Table 7), provides a range of land uses and compatibility criteria based on exterior noise levels. These standards are the same as those referenced in the California State Office of Planning and Research 2017 updates to the General Plan Guidelines, Appendix D Noise Element Guidelines, Figure 2.

These data show that exterior noise levels up to 60 dBA (CNEL or Ldn) are normally compatible in rural residential areas. Noise levels up to 70 dBA (CNEL or Ldn) are conditionally compatible. For purposes of identifying potential traffic-related impacts associated with the proposed Project, these standards are used. Because baseline conditions exceed 60 dBA around the perimeter of the Specific Plan Area, an impact is determined based on whether the project would cause a 3 dBA or greater increase in noise levels over baseline conditions.

County of Imperial General Plan

The County of Imperial General Plan's Noise Element outlines the goals and objectives for identifying and managing existing and future noise sources in County of Imperial. The General Plan also contains plans and policies to protect the public from noise intrusion. **Table 4.82** identifies applicable General Plan policies, goals, and objectives applicable to the Project's consistency with the General Plan. While this SEIR analyzes the Project's consistency with the Noise Element (2015) of the County of Imperial General Plan pursuant to CEQA Guidelines, Section 15125(d), the County of Imperial Planning Commission and Board of Supervisors will determine the Project's consistency with the General Plan.

TABLE 4.8-2: CONSISTENCY WITH APPLICABLE GENERAL PLAN NOISE GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Noise Element (NE) [(a)]		
NE Goal 1: Provide an acceptable noise environment for existing and future residents in Imperial County. • **NE Objective 1.5:** Identify sensitive receptors with noise environments which are less than acceptable and evaluate measures to improve the noise environment.	Yes	A Noise Study, prepared for the McCabe Ranch II TM 994 and Specific Plan Amendment (August 2025; Appendix E), identifies sensitive receptors that would be affected by noise from construction and/or operational activities.

TABLE 4.8-2: CONSISTENCY WITH APPLICABLE GENERAL PLAN NOISE GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
• **NE Objective 1.6:** Collect data for existing noise sources in the County in order to improve the database and enhance the ability to evaluate proposed projects and land uses.		
NE Goal 2: Review proposed projects for noise impacts and require design which will provide acceptable indoor and outdoor noise environments.	Yes	The Noise Study prepared for the McCabe Ranch II TM 994 and Specific Plan Amendment (August 2025; Appendix E), provides an analysis of project noise levels. Significant noise impacts would be reduced to below a level of significance with the incorporation of mitigation measures identified in the Certified EIR and the Noise Study.
NE Goal 3: Provide for environmental noise analysis inclusion in long range planning activities which affect the County. • **Objective 3.1** Adopt procedures for the preparation of Specific Plans which include the requirement for a noise impact analysis.	Yes	The Noise Study prepared for the McCabe Ranch II TM 994 and Specific Plan Amendment (August 2025; Appendix E), provides an analysis of project noise levels. Significant noise impacts would be reduced to below a level of significance with the incorporation of mitigation measures identified in the Certified EIR and the Noise Study.
Conservation and Open Space Element (COSE) [(b)]		
COSE Objective 2.6: Attempt to identify, reduce, and eliminate all forms of pollution; including air, noise, soil, and water.	Yes	The Noise Study prepared for the McCabe Ranch II TM 994 and Specific Plan Amendment (August 2025; Appendix E), provides an analysis of project noise levels. Significant noise impacts would be reduced to below a level of significance with the incorporation of mitigation measures identified in the Certified EIR and the Noise Study.

Sources: (a) County of Imperial General Plan Noise Element, 2015.
(b) County of Imperial Conservation and Open Space Element, 2016.

4.8.4.4. Vibration Standards

Vibration is a unique form of noise as the energy is transmitted through buildings, structures and the ground whereas audible noise energy is transmitted through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

The Noise Ordinance of the County's Codified Ordinances and General Plan Noise Element do not provide vibration standards. However, various criteria have been established to assist in the evaluation of vibration impacts. For example, the California Department of Transportation (Caltrans) has developed vibration criteria based on potential structural damage risks and human annoyance. For the protection of fragile, historic, and residential structures, Caltrans recommends a threshold of 0.2 inches per second or PPV (94 VdB). This same threshold would represent the level at which vibrations would be potentially annoying to people in buildings; thus, 94 VdB is used to quantify potential vibration impacts to neighboring structures.

4.8.5 Thresholds of Significance

Methodology

Construction noise estimates are based upon noise levels reported by the Federal Highway Administration for construction equipment and the distance between sensitive properties and the project site. Reference noise levels are used herein to estimate noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 3 dBA for line sources such as haul roads and 6 dB per doubling of distance (line-of-sight method of sound attenuation) for stationary sources and construction equipment. For the purpose of CEQA review, noise levels along SR-86, McCabe Road, Dogwood Road and Clark Road were estimated based on traffic volumes provided by Linscott, Law and Greenspan Engineers, Inc., (August 2025; Appendix G).

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. 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.
2. Result in generation of excessive ground borne vibration or ground borne noise levels.

Additionally, the County of Imperial has also established following guidelines for the evaluation of significant noise impacts:

a) If the future noise level after the Project is completed will be within the "normally acceptable" noise levels shown in the Noise/Land Use Compatibility Guidelines but will result in an increase of 5 dB CNEL or greater, the Project will have a potentially significant noise impact and mitigation measures must be considered.

b) If the future noise level after the Project is completed will be greater than the "normally acceptable" noise levels shown in the Noise/Land Use Compatibility Guidelines, a noise

increase of 3 dB CNEL or greater shall be considered a potentially significant noise impact and mitigation measures must be considered.

4.8.6 Analysis of Project Effects and Significance Determination

Impact 4.8-1: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels?

Previously Identified Level of Significance

The Certified EIR determined that that implementation of the McCabe Ranch II Specific Plan would result in a substantial increase in temporary and permanent ambient noise levels during the construction and operational phases of the Project. These impacts were identified as being potentially significant. The Certified EIR incorporated mitigation measures (MM) 4.10.1a through MM 4.10.d; MM 4.10.3a through MM 4.10.3c; MM 4.10.4; MM 4.10.5; MM 4.10.7; and MM 4.10.8 to reduce impacts to a less than significant level.

Proposed Project Impact Analysis

Temporary Construction Noise

The primary source of noise during construction activities would be comprised of heavy machinery used during site preparation (i.e., clearing/grubbing), grading and clearing the site, as well as equipment used during building construction and paving. **Table 4.8-3** shows the typical noise levels associated with heavy construction equipment. As shown in **Table 4.8-3**, average noise levels associated with the use of heavy equipment at construction sites can range from 81 to 91 dBA at 25 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction (Birdseye Planning Group, 2025c; Appendix E).

TABLE 4.8-3: TYPICAL MAXIMUM CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment Onsite	Typical Maximum Level (dBA) 25 Feet from the Source	Typical Maximum Level (dBA) 50 Feet from the Source	Typical Maximum Level (dBA) 100 Feet from the Source
Air Compressor	86	80	74
Backhoe	86	80	74
Bobcat Tractor	86	80	74
Concrete Mixer	91	85	79
Loader	86	80	74
Bulldozer	91	85	79
Jack Hammer	94	88	82
Pavement Roller	91	85	79

TABLE 4.8-3: TYPICAL MAXIMUM CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment Onsite	Typical Maximum Level (dBA) 25 Feet from the Source	Typical Maximum Level (dBA) 50 Feet from the Source	Typical Maximum Level (dBA) 100 Feet from the Source
Street Sweeper	88	82	76
Man Lift	81	75	69
Dump Truck	90	84	78
Mobile Crane	89	83	77
Excavator/Scraper	91	85	79

Note: Noise levels are based on a noise attenuation rate of 6 dBA per doubling of distance.
Source: Birdseye Planning Group, 2025c (Appendix E)

Project construction would occur over the entire SPA as individual project components and phases are developed. Noise could impact on- and off-site receivers as each phase is constructed. Construction activities will vary in distance from the nearest on- and off-site sensitive properties; thus, noise levels will vary over the workday. The closest off-site receivers are located east of the proposed Phase 1 improvements, north/northwest of the proposed Phase 2 improvements, north of McCabe Road (Phases 2 and 3), and south of McCabe Road just west of the Dogwood Road intersection surrounded by Phase 3 improvements. Existing residences that were constructed as part of McCabe Ranch Phase 1, would be located south of the proposed Phase 4 improvements which are concentrated north of Black Hills Road between Dogwood Road (east) and Farnsworth Lane (west).

While construction noise would attenuate over the distance between the nearest receivers and the work area, construction noise would likely be audible at on- and off-site properties. It is possible that noise levels could periodically exceed 75 dBA at the property line and adjacent receivers, particularly if bulldozers, excavator/scrapers and similar types of equipment are used. However, this type of equipment is mobile and moves around the site during a typical workday. Thus, while noise levels may exceed 75 dBA during pass by events, they are not likely to exceed a 75 dBA average over an 8-hour workday. However, mitigation measures from the Certified EIR would be applicable to these impacts, as would new measures identified in the

Revised mitigation measures MM 4.10.1a, MM 4.10b and MM 4.10.1c; and new mitigation measures MM NOI-1 through MM NOI-4 would reduce temporary construction noise impacts to below a level of significance. These measures require the project applicant and/or construction contractor to develop construction noise management plans for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan. The modified and new mitigation measures would be implemented to ensure that noise levels during construction do not exceed the County of Imperial construction noise standards at on- and off-site receivers. These measures are presented in Section 4.10.7.

Indirect Noise Impacts on Biological Resources

The Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711) is an international treaty that makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Sections 3503, 3503.5, and 3800 of the California Department of Fish and Wildlife Code prohibit the take, possession, or destruction of birds, their nests, or eggs. Disturbances that cause nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) or loss of habitat upon which the birds depend could be considered "take" and constitute a violation of the MBTA.

Construction-related noise levels are estimated to be 81 dBA at 100 feet and 70 dBA at 400 feet from the noise source. Mitigation measure MM BIO-1 requires project applicants to retain a qualified biologist to conduct pre-construction nesting bird surveys for construction activities planned to occur within the McCabe Ranch II Specific Plan area during the nesting season for local avian species (generally February 1 through August 31, January for raptors). No additional mitigation would be required to address indirect noise impacts on biological resources.

Long-Term Operational Noise

Traffic would primarily be comprised of new trips as each phase is developed. Stationary sources include activities associated with development of the proposed commercial center, business parks and schools. As shown on **Table 4.10.6** of this SEIR (Project Trip Generation), development of Phase 1 is estimated to generate 2,691 new daily vehicle trips, development of Phase 2 is estimated to generate 6,324 new daily vehicle trips, development of Phase 3 is estimated to generate 5,521 new daily vehicle trips; and Phase 4 is estimated to generate 11,536 new daily vehicle trips. Total daily trips generated by the c, development of all combined phases is estimated to generate 26,342 new daily vehicle trips. Of the total, morning peak hour (i.e., the heaviest hour between 7:00 a.m. and 9:00 a.m.) would generate 2,489 trips. A total of 2,483 trips would be generated during the evening peak hour (i.e., the heaviest hour between 4:00 p.m. and 6:00 p.m.).

Traffic Noise at On-Site Receivers. As stated, existing noise levels were measured around the perimeter of the Specific Plan Area on April 11, 2024 **(Table 4.8-1**). To evaluate potential project - related traffic noise impacts , roadway segments were modeled using the Federal Highway Administration Traffic Noise Model (TNM) version 2.5 software. The model calculates traffic noise at receiver locations based on traffic volumes, travel speed, mix of vehicle types operating on the roadways and related factors.

The roadway segments modeled correspond with the ADT numbers provided by Linscott, Law and Greenspan Engineers, Inc. (August 2025). Modeling assumes 10 percent of the ADT occurs during the peak hour. The scenarios modeled, as shown on **Table 4.8-4,** included Existing Condition and

under cumulative build out conditions (Phases 1, 2, 3 and 4, Year 2040). **Table 4.8-4** also shows the modeled noise levels at 100 feet from the modeled roadway centerline.

TABLE 4.8-4: MODELED ROADWAY SEGMENT NOISE LEVELS

Roadway Segment	CNEL 100 feet from Roadway Centerline			
	Existing	With Project (Year 2040)	Project Contribution (Net Change)	Potentially Significant Impact
Dogwood Road				
Heber Road to Correll Road	68.7	70.4	1.7	No
Correll Road to McCabe Road	68.0	69.7	1.7	No
McCabe Road to Danenberg Road;	68.5	70.1	1.6	No
Danenberg Road to Interstate 8	66.1	67.8	1.7	No
SR-86				
Heber Road to Correll Road	64.8	***68.2***	***3.4***	***Yes***
Correll Road to McCabe Road	64.9	***68.3***	***3.4***	***Yes***
McCabe Road to Danenberg Road;	67.6	69.9	2.3	No
Danenberg Road to Interstate 8	67.0	69.2	2.2	No
McCabe Road				
SR-86 to Farnsworth Road;	67.3	70.2	2.9	No
Farnsworth Road to Dogwood Road	63.9	65.0	1.1	No
SR-86 to Clark Road	62.2	65.8	***3.6***	***Yes***
Clark Road				
McCabe Road to Danenberg Road	66.1	69.9	***3.8***	***Yes***
Danenberg Road to Interstate 8	67.6	69.2	1.6	No

Source: Birdseye Planning Group, 2025c (Appendix E)

As shown in **Table 4.8-4**, the Project would increase noise levels along all road segments modeled. Several roadway segments would experience noise levels that exceed the County's 60 dBA CNEL thresholds and increases in noise levels that exceed 3dBA. Specifically, the Project could contribute to significant noise impacts along SR-86 south of McCabe Road and along McCabe Road west of SR-86 to the intersection with Clark Lane and along Clark Lane north to Danenberg Road. Thus, without mitigation, the Project would have a significant impact to on- and off-site receivers under the County's "Significance Threshold b" presented in Section 4.8.5.

Future exterior noise levels were estimated at building façades based on unmitigated traffic noise. **Table 4.8-5** shows the estimated CNEL at the proposed on-site residential communities based on projected traffic volumes for Year 2040. As shown, without mitigation, traffic noise would exceed 60 dBA CNEL at the first row of residences located adjacent to each roadway surrounding the Specific Plan Area. Estimated exterior sound levels can be reduced to 60 dBA CNEL or less with the installation of barriers between the residences and adjacent roadways. The estimated barrier

heights and associated noise reduction are shown in **Table 4.8-5**. Locations of the noise barriers are shown in **Figure 4.8-2**.

TABLE 4.8-5: ESTIMATED RESIDENTIAL EXTERIOR NOISE LEVELS & NOISE WALL HEIGHTS

Planning Area	Roadway	Unmitigated CNEL	Mitigated CNEL	Required Barrier Height (Feet)
Estate Lots and Single-Family	McCabe Road	64.4	58.1	7’
Flex Lots and Multi-Family	Dogwood Road	70.8	60.4	10’
Flex Lots	Correll Road	65.7	60.0	7’
Single- and Multi-Family	SR-86	68.3	60.1	10’

Source: Birdseye Planning Group, 2025c (Appendix E)

Sound barriers are most effective for reducing exterior noise in outdoor backyard open space area and with the first-floor interior living space. With respect to second floor residential noise exposure, California Energy Code Title 24 standards specify construction methods and materials that result in energy efficient structures that provide up to a 30 dBA reduction in exterior noise levels (assuming windows are closed). This includes operation of mechanical ventilation (e.g., heating and air conditioning), in combination with standard building construction that includes dual-glazed windows with a minimum Sound Transmission Class (STC) rating of 26 or higher. A 30 dBA reduction would reduce all exterior noise levels reported in **Table 4.8-4** to below 45 dBA. Thus, the interior residential noise standard is expected to be met. Modified mitigation measures from the Certified EIR, including MM 4.10.3c, MM 4.10.4, and MM 4.10.5, would address on-site exterior and interior noise impacts associated with development of each phase or components thereof. With implementation of these measures presented in Section 4.8.7, potential on-site exterior and interior noise impacts would be reduced to less than significant.

Exterior Noise at Planned School Sites. As described in Chapter 3.0, the proposed Mcabe Ranch II TM 994 includes two sites that will be offered to the McCabe Union School District and the Heber Elementary School Districts for development of elementary schools. The potential school sites are located within the Phase 2 and Phase 4 areas. This SEIR assumes the proposed schools would be developed concurrent with other land uses during Phase 2 and 4, respectively. Schools generate noise and are also sensitive to noise sources proximal to the school site. Both school sites are located with the central portion of the McCabe Ranch II SPA; and thus, would be shielded from traffic noise.

Other potential noise sources within the SPA include the 3.14-acre commercial area and the two business parks. While commercial areas and business parks are not noise sensitive uses, they can generate noise that is audible at neighboring receivers depending on the type of uses developed.

Noise associated with schools generally consists of intermittent traffic noise and outdoor playground activities that can affect the surrounding land uses. The school sites are adjacent to proposed residential developments and parks. To determine the approximate noise level generated by activities on school sites, previous noise measurements are referenced as follows:

- Soccer/outdoor field games – 52 dBA at 210 feet from the center of the field;
- Basketball/Sport Courts – 64 dBA Leq at 40 feet from the center of court;
- Playground - 64 dBA at 25 feet from the main concentration of activity;

The measured one-hour average noise level associated with outdoor school activities range from 52 to 64 dBA depending on the distance from the source. Daytime hourly average noise levels in excess of 50 dB would exceed the County's noise criteria at the residential properties. Specific residential setback information and the location of the school facilities within the planned school sites are not available. Therefore, using the worst-case scenario, elementary school noise impacts on residential land uses are considered potentially significant.

Each school would require a site-specific CEQA evaluation, prior to acquisition by the school districts. A noise study would be prepared to determine noise impacts associated with operation of the school and neighboring uses. Based on future traffic volumes and related noise levels associated with near-term and project build-out, traffic noise along each of the project-related roadways was modeled. The results of the noise modeling for roadway traffic noise are presented in **Table 4.8-4** above.

Traffic noise at the school sites would attenuate by approximately 3 dBA per doubling of distance from the roadways and the intervening buildings as well as the noise barriers installed to reduce traffic noise at adjacent residences would further reduce traffic noise at the school sites (see Table 4.8-4). However, it is possible that exterior noise exposure at the school sites caused by traffic or operation of the commercial center and/or business park could exceed 60 dB CNEL. This would be considered a significant impact. Modified Mitigation Measures MM 4.10.3b and MM 4.10.8 would reduce potential noise impacts at sensitive properties to less than significant. The modified mitigation measures are presented in Section4.8.7.

Off-Site Traffic Noise Impacts. The project would generate traffic along existing roads in the area including SR-86, McCabe Road, Dogwood Road, Farnsworth Road, Correll Road and Clark Road. Off-site traffic noise impacts are evaluated based on the direct project noise impact (existing plus project traffic volumes) and relative to the long-term cumulative noise impact.

As shown in **Table 4.8-4** above, the Project would increase noise levels along all road segments modeled; and thus, could contribute to significant noise impacts at existing receivers along SR-86 south of McCabe Road, along McCabe Road west of SR-86 to the intersection with Clark Lane and along Clark Lane north to Danenberg Road. Thus, without mitigation, the project would have a significant impact under the County's "Significance Threshold b". With implementation of mitigation measure MM NOI-5, potentially significant impacts to off-site residential receivers would be reduced to less than significant.

Train-Generated Noise Impacts On-Site. As stated, the UPRR freight rail line is located approximately 200 feet northeast of the McCabe Road/Dogwood Road intersection. Rail noise at the Specific Plan Area was estimated using proprietary program which calculates noise generated by train operation. According to the Federal Rail Commission crossing inventory (2019), a total of one freight train and two switching trains use the Dogwood Crossing daily between 6:00 AM. and 6:00 PM. No nighttime train movements occur. The CNEL estimated at 200 feet from the track is 50.5 dBA. This is below the County of Imperial exterior noise standard of 60 dBA CNEL. Rail noise impacts would be less than significant and no mitigation would be required.

Commercial Center and Business Park Noise Levels. Phase 4 includes development of a 3.14-acre commercial center and 9.41acres of business park uses. These project components would be located proximal to residences and the proposed schools. Sources of commercial noise typically include truck maneuvering and unloading, air conditioning units (HVAC), trash compactors and menu board speakers. Noise levels associated with the commercial activities would be dependent on the types of uses and based on the number of delivery trucks, loading dock areas, and customer traffic generated by the commercial site. Similarly, HVAC equipment noise would vary depending on the number and types of equipment selected, location and architectural screening. It is unknown at this time what uses would be constructed on the commercial and business park sites; however, based on the location and proximity of residences and schools, noise impacts associated with commercial activities could be potentially significant. Implementation of mitigation measure MM 4.10.3a MM 4.10.7 would reduce potentially significant impacts to less than significant.

Impact 4.8-2: Would the Project result in the generation of excessive ground borne vibration or ground borne noise levels.

Previously Identified Level of Significance

The Certified EIR determined that implementation of the McCabe Ranch II Specific Plan would result in vibration levels related to freight trains traveling northeast of the Specific Plan Area. However, the modeled vibration levels (80 PPV) would be lower than the standard thresholds of 92 PPV. Therefore, impacts were anticipated to be less than significant. Nevertheless, because the Specific Plan was intended to be implemented over a number of years, MM 4.10.10a through MM 4.10.10c were incorporated into the Certified EIR.

Construction-related vibration impacts were found to be potentially significant. Mitigation measure MM 4.10.9 requires the preparation of a detailed noise analysis as part of all site plan/development plan reviews for development applications. MM 4.10.9 also requires the noise analysis to include vibration related impacts.

Proposed Project Impact Analysis

Construction and operational activities such as demolition and excavation have the potential to generate ground vibrations. Vibration levels will attenuate to approximately 69 VdB at 200 feet from the source assuming a grader and excavator are the heaviest pieces of equipment used during grading or site clearing. As discussed, 100 VdB is the threshold where minor damage can occur in fragile buildings. Vibration levels are projected to be under this threshold; thus, structural damage is not expected to occur because of construction activities associated with the proposed Project. Vibration levels would be below the ground borne velocity threshold level of 72 VdB for residences and/or buildings where people sleep at the property line of the nearest sensitive receptor, two (2) miles from the Specific Plan Area. Vibration would not be perceptible at the nearest receiver. Vibration-related impacts would be less than significant.

Temporary Construction-Related Vibration

Construction activities for the Project would be temporary and vibration events would be transitory occurring only when equipment is passing by. To provide a conservative analysis, this SEIR considered vibration levels from construction equipment with the highest vibration levels. Under this assumption, typical ground borne vibration could reach 87 VdB at 25 feet and attenuate to 81 VdB at 50 feet, the distance between the property boundary and nearest receivers which are located at the southeast corner of SR-86 and McCabe Road intersection and west of Dogwood Road, south of McCabe Road. Construction would also occur adjacent to sensitive properties within the TM or Specific Plan area itself, as various phases are developed. Vibration at this level can cause annoyance for brief periods of time during pass by events. However sustained equipment operation is not expected to occur nor would the PPV reach levels that may cause structural damage to existing or future buildings.

As stated, vibration levels in excess of 75 VdB may be perceptible; thus, vibration may be perceptible at the nearest residences periodically when construction equipment passes by residential area. Modified mitigation measures MM 4.10.10a, MM 4.10.10b, MM 4.10.410.c, and NOI-6 have been identified to reduce potential impacts associated with vibration to less than significant.

Train-Related Vibration.

As noted, the northeast corner of the Specific Plan Area, adjacent to Dogwood Road, is located approximately 200 feet southwest of the UPRR rail corridor. Thus, a screening evaluation of potential vibration impacts was performed to determine whether development proximal to this

location would be exposed to vibration levels that could be perceived by residents. Because the receivers would be residential, it would be considered a Category 2 land use for the purposes of vibration assessment as defined in the *Federal Transit Administration, Transit Noise and Vibration Impact Assessment* (2018). This category covers all residential land uses and any buildings where people sleep, such as hotels and hospitals.

The impact criteria for a Category 2 land use is 80 VdB along infrequently used corridors (i.e., fewer than five events daily). As noted, a vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

A screening level evaluation was performed to determine the likelihood of vibrations from the UPRR corridor east of the Specific Plan Area. The screening distance for conventional commuter railroads was used to account for both passenger and freight trains. The distance between a conventional commuter railroad and Category 2 land use where the potential for a vibration impact to occur is 200 feet as defined in Table 6.8 within the FTA noise and vibration impact assessment methodology referenced above. The screening distances include a 5-decibel safety factor. Portions of the SPA along Dogwood Road are within the 200-foot screening distance. For this reason, a general vibration assessment was performed to provide a more detailed evaluation of potential vibration impacts.

The general vibration assessment methodology is provided in Chapter 6 of the assessment manual identified above. It is based on the use of a base curve to determine vibration as a function of distance from the track assuming a standard rail and ballast configuration. Using the diesel powered locomotive powered passenger or freight base curve (Figure 6-4 in the *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual*), the vibration level is 72.0 VdB at approximately 200 feet from the track at a reference speed of 50 miles per hour. Using a correction factor of 2 VdB for speed (40 in the study area vs. a 50 VdB reference level), the vibration level at 200 feet is estimated to be 70.0 VdB. Projected vibration levels would not exceed the 72 VdB threshold. To ensure the projects comports to these requirements, mitigation measures MMs 4.10a, MM 4.10.b and MM 4.10c shall be implemented.

Operational Vibration

The proposed Project would include residential, commercial, school, business park and park development. These uses do not involve heavy industrial activities or impact sources that would generate vibration detectable offsite. No impacts related operational vibration would occur.

4.8.7 Mitigation Measures

4.8.7.1. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

The Certified EIR recommended several measures to reduce construction and operation noise impacts, as well as ground-borne vibration impacts. Modified mitigation measures MM 4.10.1a through MM 4.10-10c from the Certified EIR apply to the Project and would reduce impacts to below a level of significance. They are presented below and are numbered to match their numbering in the Certified EIR. Modifications to these measures are based on the *Noise Study for the McCabe Ranch II TM 994 and Specific Plan Amendment* (Noise Study) prepared by Birdseye Planning Group (Birdseye, 2025c) provided in Appendix E. The Noise Study also identified new mitigation measures to reduce noise and vibration impacts to below a level of significance, which are presented in Section 4.8.7.2.

Construction Noise Management Plan

MM 4.10.1a Construction Noise Management Plan - Construction Equipment Mufflers

A Construction Noise Management Plan shall be prepared by a qualified acoustical consultant for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan. The Construction Management Noise Plan shall contain a set of site-specific noise attenuation measures to reduce construction noise to less than 75 dB Leq when averaged over an 8-hour period or to the extent feasible.

Construction Noise Management Plan shall require that Construction Contractors equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards for all excavation and grading within the SPA, construction Contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The Construction Contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the site.

Timing/Implementation	*A Construction Noise Management Plan shall be submitted for approval prior to issuance of site-specific grading permits.*
Enforcement/Monitoring	*Imperial County Planning and Development Services Department (ICPDSD).*

MM 4.10.1b Construction Noise Management Plan – Equipment Staging Areas As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall locate equipment staging in areas that will create the greatest

distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities.

Timing/Implementation *A Construction Noise Management Plan is to be submitted for approval prior to issuance of site-specific grading permits.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.1c Construction Noise Management Plan – Limit Construction Hours

As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall limit all construction-related activities that would result in high noise levels to County-determined hours of construction.

Timing/Implementation *A Construction Noise Management Plan is to be submitted for approval prior to issuance of site-specific grading permits.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.1d Construction Noise Management Plan – Limit Haul Truck Deliveries

As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, Construction Contractors shall limit haul truck deliveries to the same hours specified for allowable use of construction equipment. To the extent feasible, haul routes shall avoid sensitive land uses or residential dwellings.

Timing/Implementation *A construction noise plan is to be submitted for approval prior to issuance of site-specific grading permits.*

Enforcement/Monitoring *ICPDSD.*

Site Specific Noise Analyses

MM 4.10.3a Site Specific Noise Analysis – Commercial Uses

A detailed noise analysis shall be prepared as part of site plan/development plan review for future commercial development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical study may require mitigation measures such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure to adjacent residences, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or constructing noise barriers or enclosures

around noisy equipment. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval.

Timing/Implementation *Prior to the issuance of grading permits for commercial uses located within Phase 4.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.3c Noise Barrier Plan

The project developer will provide a 10~~9~~-foot- high noise barrier at all residential land uses along Dogwood Road, provide a 7-foot-high noise barrier at all residential areas along McCabe Road, provide a 7-foot-high noise barrier at all residential areas alongSR-86, and provide a 7-foot-high noise barrier at all residential areas along Correll Road to reduce traffic noise to all exterior living areas deemed noise sensitive (see Figure 4.8-2, Noise Barrier Locations). These noise barrier heights would result in future backyard noise levels ranging from 58.1~~59.2~~ to 60.4~~59.9~~ dB CNEL and meet the County of Imperial's exterior 60 dBA noise standard. A Noise Barrier Plan shall be prepared and submitted to the County. Construction of these barriers would reduce noise impacts related to traffic on-site to levels that are considered less than significant.

Timing/Implementation *Prior to issuance of site- specific grading permits.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.4 Site-Specific Noise Analysis – Residential Interior Noise Levels

The required interior noise level reduction for all future residential uses shall be accomplished with a window-closed condition, requiring a means of mechanical ventilation and dual glazed windows with a minimum Sound Transmission Class (STC) rating of 26. Verification of these requirements shall be based upon the final noise study, which is required prior to obtaining building permits. The final noise study shall evaluate the effects of the precise building placement, design, and materials used for construction.

Timing/Implementation *A final noise plan is to be submitted for approval prior to issuance of a building permit.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.5 Final Noise Plan - Interior Noise Levels

The California Building Code requires project- specific acoustical analyses to achieve interior noise levels of 45 dBA CNEL or lower in residential units exposed to exterior noise levels greater than 60 dBA CNEL. Building sound insulation requirements would need to include the provision of forced-air mechanical ventilation in noise environments exceeding 60 dBA CNEL, so that windows could be kept closed at the occupant's discretion to control noise. Special building construction techniques

(e.g., sound-rated windows and building facade treatments) may be required where exterior noise levels exceed 65 dBA CNEL. These treatments include, but are not limited to sound rated windows and doors, sound rated exterior wall assemblies, acoustical caulking, etc. The specific determination of what treatments are necessary will be conducted on a unit-by-unit basis during project design. Results of the analysis, including the description of the necessary noise control treatments, will be submitted along with the building plans and approved prior to issuance of a building permit.

Timing/Implementation *A final noise plan is to be submitted for approval prior to issuance of building permit.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.7 Site Specific Noise Analysis – Commercial Development

A detailed noise analysis shall be prepared as part of site plan/development plan review for future commercial development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical study may require mitigation measures such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure to adjacent residences, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or constructing noise barriers or enclosures around noisy equipment. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval.

Timing/Implementation *Prior to issuance of site-specific grading permits*

Enforcement/Monitoring *ICPDSD*

MM 4.10.8 Site Specific Noise Analysis – School Sites

A site-specific acoustical analysis shall be prepared for the two (2) elementary school sites, addressing noise control measures for outdoor school activity noise upon immediately adjacent residential land uses. The acoustical study shall identify appropriate control measures for traffic-related noise sources upon the exterior use areas to ensure that noise levels do not exceed 60 dB CNEL at exterior use areas. Control measures may include physical improvements such as the installation of noise barriers to address traffic noise and operational controls such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or installing enclosures around noisy equipment.

The McCabe Union School District and the Heber Elementary School District shall have the responsibility to commission or fund the required acoustical analyses. All required noise control measures identified in the acoustical analyses shall be made conditions of development approval.

Timing/Implementation *Prior to issuance of site-specific grading permits*

Enforcement/Monitoring *ICPDSD, McCabe Union School District and Heber Elementary School District.*

MM 4.10.9 Site Specific Noise Analysis – Residential Development

A detailed noise analysis shall be prepared as part of site plan/development plan review for future development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The ~~acoustical~~ noise analysis shall also include an analysis of vibration-related impacts. All required noise control measures identified in the ~~acoustical~~ noise analysis shall be made conditions of development approval.

Timing/Implementation *Prior to issuance of site-specific grading permits.*

Enforcement/Monitoring *ICPDSD*

Vibration Studies/Plans

MM 4.10.10a Noise Vibration Study for Train-Related Noise

A detailed noise vibration study shall be prepared as part of site plan/development plan review for development applications and shall include vibration-related impacts.

Timing/Implementation *Prior to issuance of site-specific grading permits*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.10b Vibration Setback from UPRR Tracks

An 80-foot vibration setback from the UPRR tracks shall be maintained for all structures built for human occupation . The setback shall be measured from the centerline of the tracks.

Timing/Implementation *Prior to issuance of occupancy permits.*

Enforcement/Monitoring *ICPDSD.*

MM 4.10.10c Vibration Study

Prior to the issuance of building permits for development in the Specific Plan Area , a detailed vibration design study shall be completed to determine more precisely the ground vibration levels and frequency content along the UPRR tracks and to confirm appropriate design to limit interior vibration levels to 80 VdB.

Timing/Implementation *Prior to issuance of building permits*

Enforcement/Monitoring *ICPDSD.*

4.8.7.2. Newly Proposed Mitigation Measures

The noise analysis for the McCabe Ranch II TM 994 and Specific Plan Amendment identified additional mitigation measures to reduce construction and operational noise impacts to below a level of significance. These newly proposed mitigation measures are numbered **MM NOI-1 through MM NOI-6** and are presented below.

MM NOI-1 Construction Noise Management Plan – Construction Equipment.

As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, electrical power shall be used to run air compressors and similar power tools. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet an STC rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

Timing/Implementation: *The Construction Noise Management Plan shall be submitted to the ICPDSD prior to grading permit issuance. The Noise Control Plan and Neighbor Notification Program shall be implemented during construction activities, and upon completion of monitoring activities.*

Enforcement/Monitoring *ICPDSD.*

MM NOI-2 Construction Noise Management Plan – Limit Operations Adjacent to Receivers.

As part of the Construction Noise Management Plan required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, the Construction Contractor shall limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time to the extent feasible.

MM NOI-3 Construction Noise Management Plan – Neighbor Notification

As part of the Construction Noise Management Plan, required for any future development phase, development activity or infrastructure activity that would occur under TM 994 or the McCabe Ranch II Specific Plan, the construction contractor shall designate a noise control monitor to oversee construction operations in proximity to sensitive receivers. The Noise Plan shall also include a

requirement for the construction Contractor to provide notification to residential occupants nearest the construction activities at least 7-14 days prior to initiation of construction activities that could result in noise levels exceeding 75 dBA at the property line adjacent to residences. This notification shall include the anticipated hours and duration of construction and a description of noise reduction measures being implemented for the construction activity(ies). The notification should include a telephone number for local residents to call to submit complaints associated with construction noise.

A copy of the Neighbor Notification document shall be included in the Noise Control Plan, and submitted to the ICPDSD, prior to grading permit issuance. A copy of the Neighbor Notification document shall also be provided to the ICPDSD concurrent with its distribution to the nearest residential occupants.

Timing/Implementation: *he Noise Control Plan and Neighbor Notification shall be implemented prior to and during construction activities.*

Enforcement/Monitoring: *ICPDSD.*

MM NOI-4 Construction Noise Management Plan – Noise Monitoring

Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to avoid construction noise levels exceeding 75 dBA Leq at the nearest sensitive receivers. The Construction Noise Management Plan may include the following requirements:

- Contractor shall turn off idling equipment;
- Contractor shall perform noisier operation during the times least sensitive to receptors;
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers;
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.

With implementation of the above-referenced mitigation, temporary on- and off-site construction noise impacts would be less than significant.

Timing/Implementation *Prior to issuance of building permits and during construction.*

Enforcement/Monitoring *ICPDSD.*

MM NOI-5 Site Specific Noise Study – Residential Exterior Noise Levels

A site-specific noise study shall be performed for each future development phase, development activity or infrastructure activity or portion thereof, that would occur under TM 994 or the McCabe Ranch II Specific Plan, to determine exterior noise levels at affected on and off-site residential

properties to ensure interior noise levels of 45 dBA CNEL or lower are achieved in residential units exposed to exterior noise levels greater than 60 dBA CNEL. The analysis shall include an evaluation of noise barrier specifications required to achieve County of Imperial noise standards. Building sound insulation requirements shall include the use of forced-air mechanical ventilation, so that windows could be kept closed at the occupant's discretion to control noise. Determination of specific treatments shall be conducted on a unit-by-unit basis during project design.

Results of the analysis, including the description of the necessary noise control treatments, shall be incorporated into a site/project specific environmental review and be submitted along with the building plans and approved prior to issuance of a building permit.

The County shall, at its discretion, determine whether off-site residences affected by project-related traffic noise warrant an evaluation of potential project impacts and mitigation options should impacts be determined potentially significant.

MM NOI-8 Site Specific Acoustical Analysis

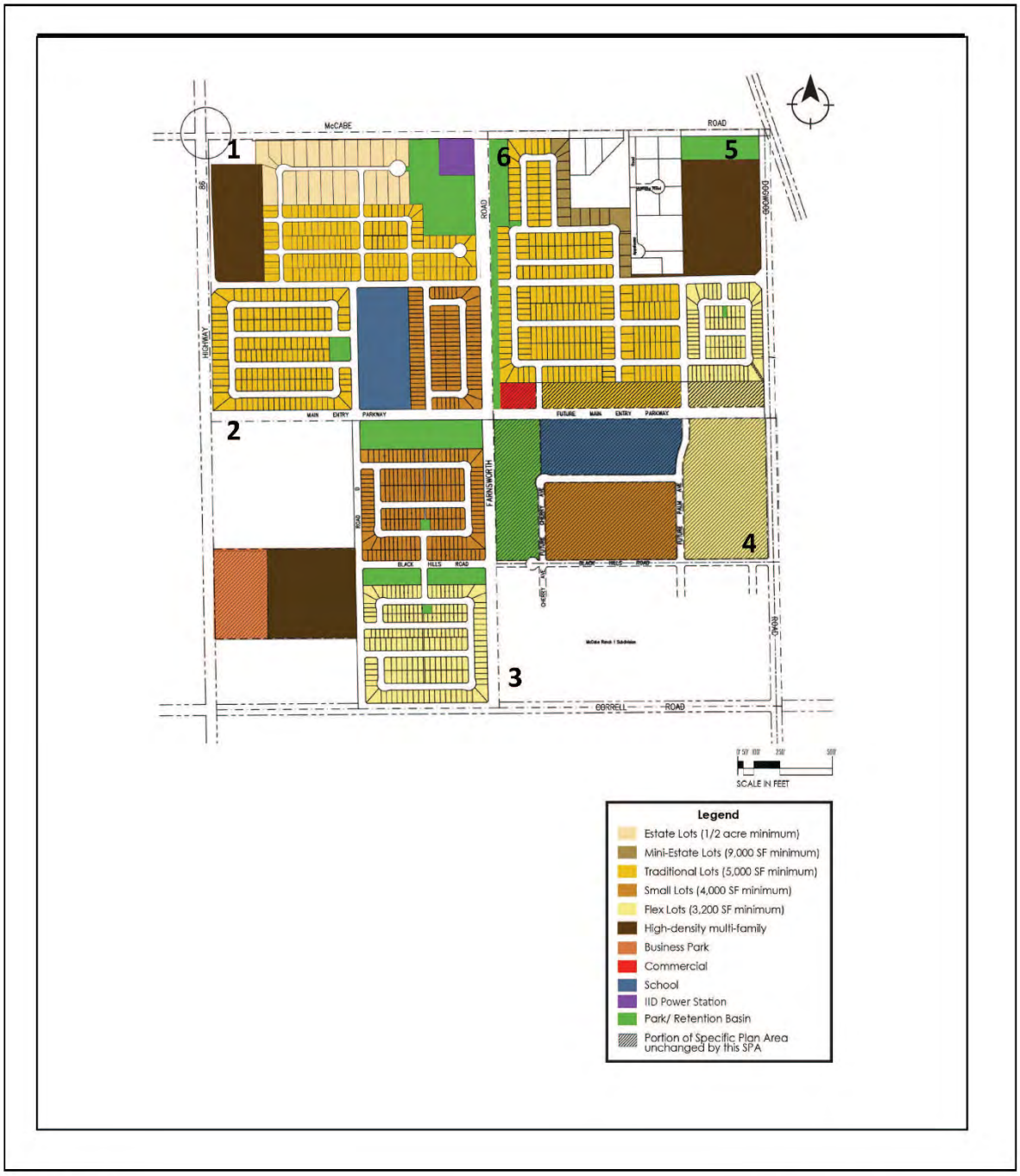
A site-specific acoustical analysis shall be prepared for the two elementary school sites proposed to address exterior use areas of the site (playground, sports fields, athletic courts, etc.). The acoustical study shall identify appropriate control measures for traffic-related noise sources upon the exterior use areas to ensure that noise levels do not exceed 60 dB CNEL at exterior use areas. Control measures may include physical improvements such as the installation of noise barriers to address traffic noise and operational controls such as limiting the hours of delivery and operation, designing site plans to minimize areas of noise exposure, selecting and locating HVAC equipment to comply with the County's Noise Ordinance, and/or installing enclosures around noisy equipment. All noise control measures required to meet County of Imperial noise standards shall be made conditions of development approval.

MM NOI-6 Detailed Vibration Analysis

A detailed vibration analysis shall be prepared as part of site plan/development plan review for future development applications submitted to the County, to ensure noise levels would comply with the County's General Plan Noise Element standards and County Noise Ordinance standards and not result in significant noise impacts at adjacent residences. The acoustical analysis shall include an analysis of vibration-related impacts. All required noise control measures identified in the acoustical analysis shall be made conditions of development approval.

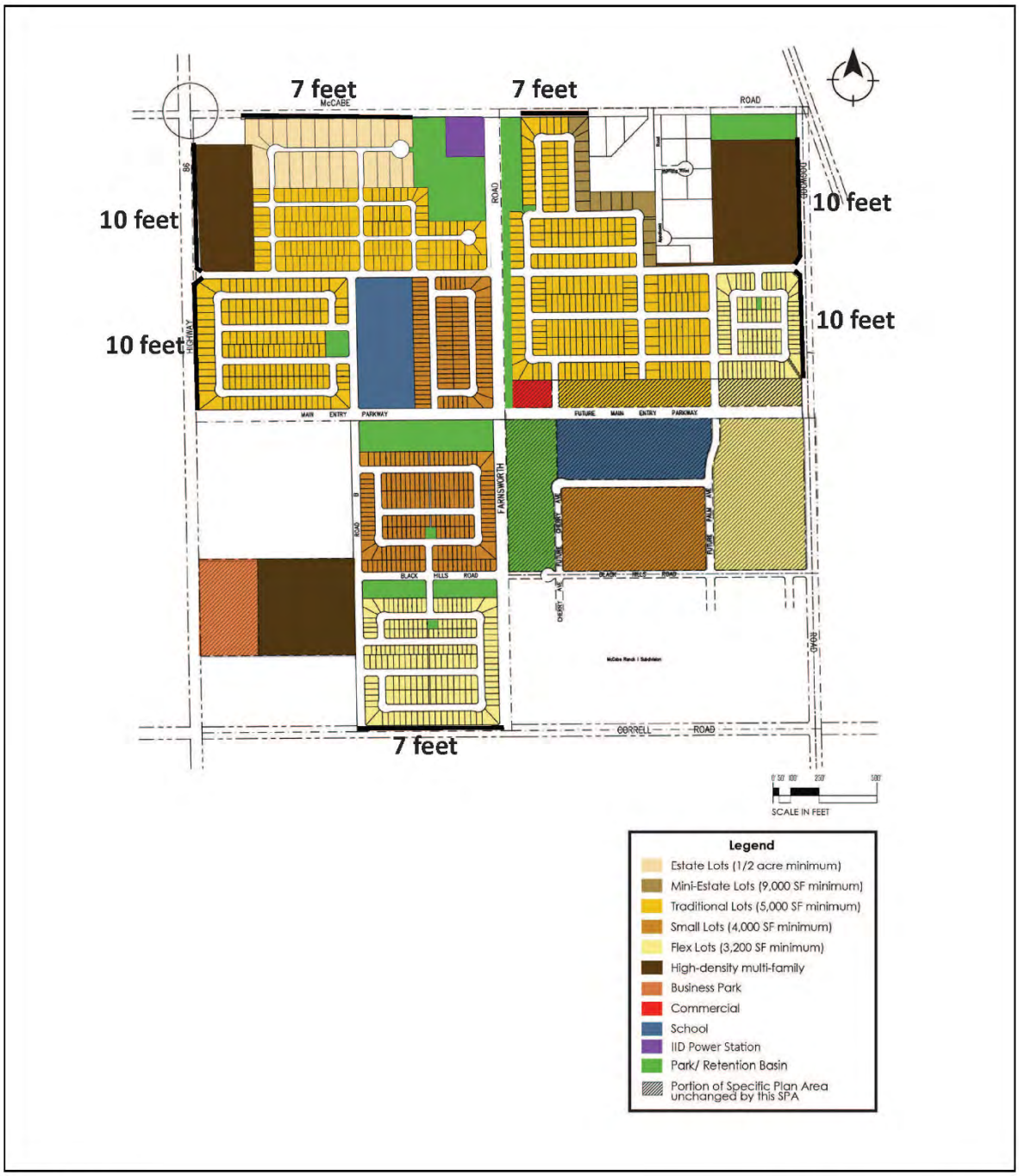
4.8.8 Level of Significance After Mitigation

Implementation of the mitigation measures identified above, along with existing regulatory programs, would reduce potential impacts associated with noise and vibration to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to noise and vibration would occur.



Source: BPG, 2025c

Noise Monitoring Locations
McCabe Ranch II Tract Map 994 and Specific Plan Amendment
Figure 4.8-1



Source: BPG, 2025c

Noise Barrier Locations
McCabe Ranch II Tract Map 994 and SPA
Figure 4.8-2

4.9. Public Services

4.9.1 Introduction

This section provides the supplemental analysis required to assess potential public service impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment. It also compares impacts of the proposed Project to those that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR.

This section discusses the existing service providers within and around the McCabe Specific Plan Area and provides an analyses of potential short-term and long-term public impacts that would result from implementation of the proposed Project. This section also evaluates the Project's consistency with relevant local agency regulations and compares impacts to those identified in the 2010 Previous Final EIR. Further, this section identifies specific and detailed measures from the Certified EIR that apply to the Project, or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse public service.

Scoping Issues Addressed

During the scoping period for the proposed McCabe Ranch II TM 994 and Specific Plan Amendment, a public scoping meeting was conducted, and written comments were received from regulatory agencies and from members of the public. No comments related to public services were received.

4.9.2 Summary of Previous Final EIR Findings

Potential public services impacts associated with development within the McCabe Ranch II Specific Plan area were evaluated in Section 4.12 of the Certified EIR.

Emergency Response Access

The Certified EIR found that circulation and access to the Specific Plan and surrounding area could be hindered by heavy equipment and/or trucks delivering building materials during construction of each of development phase. This hinderance could affect the emergency response times of law enforcement, fire protection and emergency medical services and was deemed to be a potentially significant public service impact. Mitigation measure MM 4.12.1.1 (Construction Traffic Control Plan) was identified to reduce delays on fire protection, law enforcement and emergency medical services response times to below a level of significance.

Increase Public Service Demands

The Certified EIR also found that implementation of the McCabe Ranch II Specific Plan would result in an increased demand for fire protection, law enforcement and emergency medical services above pre-project conditions. The Certified EIR identified mitigation measure MM 4.12.1.2a and

mitigation measure MM 4.12.1.2b, which required project applicants to pay their fair share contribution for additional fire facilities and to pay Fire Impact Fees, respectively. Similarly, the Certified EIR identified mitigation measures MM 4.12.2.2a and MM 4.12.2.2b which require the payment of fire and law enforcement impact fees pursuant to Ordinance 1418 Section 2.

For increases in the demand for library services above pre-project conditions, the Certified EIR identified mitigation measure MM 4.12.4.1, which requires the applicant of each development phase to pay their fair share contribution to assist in the construction of additional library facilities.

For potential impacts to the Heber and McCabe Union Elementary School Districts and the Central Union High School District, the Certified EIR found that implementation of the McCabe Ranch II Specific Plan would add new students to each District. Mitigation measures MM 4.12.3.1a and MM 4.12.3.1b, which require the applicant to pay a fair share to assist in the construction of additional school facilities; and to consult with applicable districts regarding each district's school sizing criterial, respectively were identified to reduce impacts to below significant.

4.9.3 Environmental Setting

4.9.3.1. Fire Protection Services

The McCabe Ranch II Specific Plan area is located within the Imperial County Fire Department/Office of Emergency Services (ICFD/OES) area of service. ICFD/OES currently has eight fire stations serving 9 locations and four contracting agencies serving the entire 4,500 square miles of unincorporated Imperial County (County of Imperial, 2022). The ICFD stations are located in the communities of Heber, Seeley, Ocotillo, Palo Verde, Niland, Winterhaven, Salton City, and the City of Imperial (County of Imperial, 2022). According to the Imperial County Seismic and Public Safety Element of the General Plan, each of the county fire stations is staffed with a Captain, Firefighter, and Reserve Firefighter with the only exception being the Ocotillo station that is staffed with two Reserve Firefighters. Every fire station has a Type I engine as its primary apparatus. The City of Imperial and Heber stations also house a Ladder Truck along with the Type I engine. The Seeley and Heber stations also house Type Ill engines. The ICFD Emergency Units strive to respond immediately after receiving the initial tone for service. The actual response time would be determined by the area of response throughout the vast response area covered.

The closest fire station is located at 1078 Dogwood Road, Heber, within less than a mile of the SPA. Additionally, the City of El Centro Fire Department has mutual aid agreements with the County of Imperial and other jurisdictions within the county. The El Centro Fire Department currently has three fire stations, located at 775 State Street and 900 South Dogwood Road in the City of El Centro, and provides 24-hour coverage. Emergency medical response to the Project area would be from local ambulance services operating from the El Centro Regional Medical Center which provides full medical facilities, including 24-hour emergency room service.

Imperial County Fire Response Standards: Neither the 2025 Imperial County Emergency Operations Plan (County of Imperial 2025) nor the Imperial County General Plan Seismic and Public Safety Element have established fire response standards for unincorporated areas (County of Imperial 2022). Incorporated cities within Imperial County have established fire response standards. For instance, the City of El Centro's standard fire response time is approximately 7 to 10 minutes for emergencies and 10 to 15 minutes for non-emergencies (City of El Centro Safety Element, 2023).

4.9.3.2. Police Protection Services

The Imperial County's Sheriff's Department is responsible for police protection services in the unincorporated areas of Imperial County and the City of Holtville. The patrol function is divided between North County Patrol, South County Patrol, East County Patrol, City of Holtville and Boating/Off-Highway. Deputies assigned to the Patrol Divisions are the "first responders" to a call for law enforcement service. The main patrol station is located in El Centro on Applestill Road. Sheriff substations are located in the communities of Brawley, Niland, Holtville, Salton City, Palo Verde and Winterhaven. Under an existing mutual aid agreement, additional law enforcement services would be provided if and when required by all of the cities within the county, as well as with Border Patrol and the California Highway Patrol. The California Highway Patrol provides traffic regulation enforcement, emergency accident management, and service and assistance on state roadways and other major roadways in the unincorporated portions of Imperial County.

The closest sheriff's station to the SPA is the main patrol station in El Centro, located at 328 Applestill Road. This station is approximately 2.1 miles west of the SPA.

Police Response Standards: Incorporated cities within Imperial County have established police response standards. For instance, the El Centro Police Department's goal is to have 1.75 police officers per 1,000 population.

4.9.3.3. Public Schools

Educational services to the project area are provided by Heber Elementary School District (HESD), the McCabe Union Elementary School District (MUESD), and the Central Union High School District (CUHSD). The locations of the School District boundaries within the McCabe Ranch II SPA are presented on **Figure 4.9-1**.

Heber Elementary School District

The HESD is located between Calexico and El Centro in Imperial County. The HESD comprises one kindergarten through 8th grade (K–8) school, which is located at 1052 Heber Avenue, Heber. The total student enrollment for the 2024–20254 school year was 1,155 students (California Department of Education, 2025).

McCabe Union Elementary School District

The MUESD provides kindergarten through 8th grade education to those students outside of the City of El Centro and in some areas in the city. The McCabe Union Elementary School District currently operates McCabe Elementary School (Corfman Middle School. During the 2024-2025 school year, enrollment within the district was 1,109 students (California Department of Education, 2025).

Central Union High School District

The CUHSD comprises five schools: Central Union High School, Southwest High School, Desert Oasis High School, Mt. Signal Virtual Academy and Phoenix Rising High. The proposed project would be served by Central Union High School located at 1001 Brighton Avenue, El Centro. In the 2024–2025 school year, Central Union High School District had an enrollment of 4,070, with 2,006 of them attending Central Union High School (California Department of Education, 2025).

4.9.3.4. Parks

As an unincorporated community, parks and recreation facilities would typically be under the purview of the County of Imperial, but the Heber Public Utility District (HPUD) and the County have entered into various service agreements whereby HPUD is responsible for operation and maintenance of certain park facilities. The Heber community has four (4) improved parks and the HPUD owns three of them.

According to the HPUD Service Area Plan, the District has a performance standard for parks of 5-acres per 1,000 in population. HPUD currently provides 21.53 acres of parkland, while the existing demand for park space is 34.89 acres, based on a 2017 population of 6,979 persons for the Heber Community (HPUD, 2018).

4.9.3.5. Other Services and Public Facilities

Other services and public facilities that serve the Project area include libraries and hospitals. The nearest public library is at 1132 Heber Ave. The nearest hospital is El Centro Regional Medical Center.

4.9.4 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the Project.

State

Fire Protection

The California Fire and Building Codes address general and specialized fire safety requirements for buildings. Topics addressed in the codes include, but are not limited to, fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions to protect and assist first responders, and industrial processes.

Parks - Quimby Act

Cities and counties have been authorized, since the passage of the 1975 Quimby Act (California Government Code Section 66477), to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements (California Department of Parks and Recreation, 2002). In 1982, the Quimby Act was amended to define acceptable uses of Quimby funds. Revenues generated by the Quimby Act cannot be used for the operation and maintenance of park facilities. The goal of the Quimby Act was to require developers to help mitigate the impacts of property improvements. The act gives authority for passage of land dedication ordinances only to cities and counties.

The City currently collects development fees for new community and parkland facilities and/or improvements, including open space acquisition and/or trail development that are needed to serve new development projects.

School Fees

California Government Code Section 65995

Pursuant to California Government Code Section 65995 et. seq. and California Education Code Section 17620 et. seq., school districts are authorized to levy fees on new residential, commercial, and industrial development within their respective boundaries, to fund the construction of new school facilities to accommodate the students from new development. The fees can also be used to fund the reconstruction of existing school facilities to accommodate new student. Such fees are typically collected prior to the issuance of building permit by the cities or county. Government Code Section 65995(h) declares that the payment of the development fees authorized by Education Code Section 17620 is “full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities.”

The Central Union High School District and the Heber Elementary School District have each prepared *Level I Developer Fee Studies* which establish a legal and financial basis for both districts to charge developer fees on new residential, commercial, or industrial construction (Central Union High School District, 2024; Heber Elementary School District, 2024). The fee studies also demonstrate a “reasonable relationship” (nexus) between new developments and the resulting

impact on the need for, and cost of, school facilities. This allows each district to recover costs for necessary facility construction, modernization, or expansion to accommodate the increased student population generated by the new developments. Similarly, the McCabe Union Elementary School District has prepared a *School Facility Fee Justification Report For Residential, Commercial & Industrial Development Projects* (February 2023), identifies residential and commercial/industrial developer fees for future developments.

Senate Bill 50/CA Government Code Section 65995

SB 50 was signed into law in 1998 imposing limitations on the power of cities and counties to require mitigation of school facilities' impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at a higher rate for residential development than previously allowed. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by law (Education Code Section 17620 or Government Code Sections 65970, et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property.

Local

County of Imperial General Plan

The Imperial County General Plan provides goals, objectives, policies, and programs regarding the preservation and use of water. **Table 4.9-1** provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed Project. While the SEIR analyzes the project's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Planning Commission and Board of Supervisors ultimately determine consistency with the General Plan.

Seismic and Public Safety Element

The Seismic and Public Safety Element is a state-mandated General Plan element that must identify potential natural and human-created hazards that could affect Imperial County (County) residents, businesses, and services. The purpose of the Seismic and Public Safety Element is to establish a framework that anticipates these hazards and prepares the community to mitigate exposure to these hazards. The Imperial County Multi-Jurisdictional Hazard Mitigation Plan, adopted by the Board of Supervisors and certified by the Federal Emergency Management Agency, is incorporated into the Seismic and Public Safety Element.

TABLE 4.9-1: CONSISTENCY WITH APPLICABLE GENERAL PLAN – PUBLIC SAFETY

General Plan Policies	Consistency	Analysis
Seismic & Public Safety Element (a)		
Goal 1: Include public health and safety considerations in land use planning.	Yes	The McCabe Specific Plan includes public safety policies that are consistent with the Public Safety Element.
Objective 1.8: Reduce fire hazards by the design of new developments	Yes	All future development activities will be reviewed by the Fire Department as part of the building permit process.
Goal 2: Minimize potential hazards to public health, safety, and welfare and prevent the loss of life and damage to health and property resulting from both natural and human-related phenomena.	Yes	All future development activities shall be consistent with state and local fire codes and provide site design measures to reduce the potential for fire hazards.
Policy 4.10 Coordinate with the ICFD to ensure that the Department has appropriate municipal staffing to address development pressure and adequately respond to long-range fire safety planning.	Yes	Mitigation measure MM 4.12.1.2a ensures compliance with this policy.

Source: County of Imperial, 2022.

Imperial County Office of Emergency Services - Multi-Hazard Mitigation Plan

The ICFD is the local OES in Imperial County. Imperial County has developed the multi-jurisdictional hazard mitigation plan (MHMP) to create a safer community. The purpose of the MHMP is to significantly reduce deaths, injuries, and other disaster losses caused by natural and human-caused hazards in Imperial County. The MHMP describes past and current hazard mitigation activities and outlines goals, strategies, and actions for reducing future disaster losses. The Imperial County MHMP is the representation of the County's commitment to reduce risks from natural and other hazards and serves as a guide for decision-makers as they commit resources to reducing the effects of natural and other hazards. The jurisdictions included in the MHMP include the cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial, and Westmoreland, the IID and the Imperial County Office of Education. The MHMP complies with all federal, state, and local laws guiding disaster management.

Imperial County Emergency Operations Plan

The Imperial County Emergency Operations Plan (EOP) provides guidance and procedures for the County to prepare for and respond to emergencies. The EOP designates the Sheriff's Department as having jurisdiction in an emergency involving evacuation within the unincorporated areas of the county and within contract cities.

4.9.5 Thresholds of Significance

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. 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 the following public services:
    - Fire Protection
    - Police Services
    - Other Public Facilities
    - Schools
    - Parks

4.9.6 Analysis of Project Effects and Significance Determination

Impact 4.9-1: Would the Project result in substantial adverse physical impacts from 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 fire protection, police protection, schools, parks or other public facilities?

Summary of Previous Final EIR Findings

Potential public service impacts associated with development within the McCabe Ranch II SPA were evaluated in the Certified EIR and determined to be significant. The Certified EIR identified a series of mitigation measures to reduce impacts to less than significant. These included MM 4.12.1.1, MM 4.12.1.2a, MM 4.12.1.2b, MM 4.12.1.3, MM 4.12.2.2a,MM 4.12.2.2b, MM 4.12.3.1a, MM 4.12.3.1b, MM 4.12.4.1 and MM 4.13.1.

Proposed Project Impact Analysis

The Project, through the addition of residential units, will result in an increase in population above current levels within the SPA; however, it would not result in the addition persons living and working in the area above that previously estimated in the Certified EIR. The Certified EIR assessed impacts associated with the development of 2,300 single- and multiple-family units , resulting in the addition of 7,820[1] new County residents. *SCAG's 2024 Demographics and Growth*

[1] Southern California Association of Government's reported the average number of persons per household in Imperial County is 3.4

Forecast found that the average number of persons per household in Imperial County ranged from 2.9 and 3.3 persons per household between 2025 and 2050. Assuming a conservative 3.3 persons per household, development of the proposed Project is anticipated to result in the addition of approximately 7,590 persons to the County (2,300 DU x 3.3 persons per household /DU = 7,590 persons) compared to the 7,820 persons identified in the Certified EIR.

The change in project-related population estimates is a result of a reduction in the average number of persons per household, as opposed to a reduction in the proposed number of housing units. The proposed Project would be consistent with the land use designations included in the adopted McCabe Ranch II Specific Plan; thus, no new substantial unplanned growth would occur that was not previously analyzed in the Certified EIR.

Fire Protection Services

During construction of the proposed TM 994 and specific plan amendment, access to the TM and surrounding areas may be disrupted by heavy equipment, trucks carrying building materials, and installation of necessary improvements during construction of each of project phase. As a result, the construction associated with the Project has the potential to interfere with circulation and access to the project site and nearby properties. This could potentially affect emergency response times for vehicles using SR 86 and surrounding local roadways. Mitigation measure MM 4.12.1.1, which requires preparation and implementation of a traffic control plan during construction activities of each phase of development, would reduce the potential effects resulting from emergency response during construction activities to a minimum. This impact is considered less than significant.

The ICFD currently responds after receiving the initial tone for service and provides response times concurrent with the driving time at a legal rate of speed from the responding station to the area where service is requested, taking into consideration posted speed limits, signal lights, stop lights, and time of day. Response times would be maintained at adequate times in the future because of the central location of the fire station, and because the ICFD requires that individual project developments contribute to the provision of fire facilities, equipment, and staff at levels considered commensurate (or “fair share”) with the anticipated increase in demand that would occur from each project. The HPUD Service Area Plan states that as development continues to occur, response times may increase due to the potential for simultaneous calls. The project proponent would be required to pay a fair share contribution for additional fire facilities, equipment, and staff, as determined appropriate by the ICFD.

The proposed Project would be consistent with the land use designations included in the adopted McCabe Ranch II Specific Plan; thus, no new substantial unplanned growth would occur that was not previously analyzed in the Certified EIR. Mitigation measures MM 4.12.1.2.a and 4.12.1.2b require a fair share contribution for additional fire facilities, equipment, and staff and impact fees for all future development within the Specific Plan area. Implementation of these measures would

reduce the potential effects related to demand for fire protection and emergency medical services to a minimum. This impact is considered less than significant.

Additionally, on February 18, 2025, the Imperial County Board of Supervisors approved a new Automatic Aid Agreement (Agreement) for Exchange of Fire Protection and Specialized Rescue between the City of El Centro Fire Department, City of Imperial, American Medical Response and Imperial County Fire Department for a one (1) year period effective January 1, 2025. The Agreement, which is a collaboration between Imperial County, El Centro and the city of Imperial fire departments and American Medical Response (AMR), ensures that fire and medical resources are dispatched simultaneously rather than waiting for requests from the first responding unit. and authorized the Imperial County Fire Chief to enter into automatic one (1) year renewals. The objective of the agreement is to establish a system intended to substantially reduce emergency response times for residential structure fires. The Agreement covers a geographic area that encompasses from north to south the City of Imperial and the community of Heber, and east to west Highway 111 to the community of Seeley and further contribute to ensuring that acceptable response times can be maintained.

Sherrif Protection Services

The Imperial County Sheriff's Department provides law enforcement to the McCabe Ranch II SPA. Sheriff's officers that patrol the area are based the main patrol station in El Centro, located at 328 Applestill Road. As discussed above, the proposed Project would be consistent with the land use designations proposed in the adopted McCabe Ranch II Specific Plan; thus, no new substantial unplanned growth would occur that was not previously analyzed in the Certified EIR. Nonetheless, this anticipated growth generated by the proposed project would increase service calls but is expected to create the typical range of police service calls, which may relate to crime and safety issues during project construction (e.g., theft of building materials and construction equipment and vandalism) and during project operation (e.g., vehicle burglaries, thefts, commercial shoplifting, and disturbances).

Mitigation measures MM 4.12.2.2.a and MM 4.12.2.2b require a fair share contribution for additional sheriff facilities, equipment, and staff and impact fees for all future development within the Specific Plan area. Implementation of these measures would reduce the potential effects related to demand for fire protection and emergency medical services to a minimum. With MM 4.12.2.2.a and MM 4.12.2.2b, impacts on Sherrif Protection Services would be reduced to below a level of significance.

School Services

Development of the McCabe Ranch II TM 994 and Specific Plan Amendment would add new elementary, middle and high school students to the SPA. Based on the proposed residential development and each school District's enrollment boundary, the Project is anticipated to add a

total of 1,735 students to the Heber, McCabe and Central Union High School Districts combined, as shown in **Table 4.9-2**. Of this total, 441 students are anticipated to be added to the McCabe Elementary School District (**Table 4.9-3**); 712 students would be added to the Heber Elementary School District (**Table 4.9.4**), and 351 students would be added to the Central Union High School District (**Table 4.9-5**). This impact would be potentially significant.

TABLE 4.9-2. STUDENT GENERATION SUMMARY

Project Phase	Elementary/Middle School Students	High School Students	Total Student Generation
Phases 1, 2 and 3	1,039	248	1,287
Phase 4	345	104	449
TOTAL	**1,384**	**351**	**1,735**

TABLE 4.9-3. STUDENT GENERATION – MCCABE ELEMENTARY SCHOOL DISTRICT

Development Phase	Time Frame	Dwelling Units (DUs) (1)			McCabe Elementary School District	Student Generation Rate (a)	Students
		SF	MF	Total			
1B	2026 -2027	157	0	157	McCabe Elem (Gr. TK – 4) Corfman Middle (Gr. 5 – 8)	0.766	79
2A	2029 - 2031	260	0	260	McCabe Elem (Gr. TK – 4) Corfman Middle (Gr. 5 – 8)	0.766	130
2B	2032 - 2033	159	196	355	McCabe Elem (Gr. TK – 4) Corfman Middle (Gr. 5 – 8)	0.766	178
3C	2038 - 2039	107	0	107	McCabe Elem (Gr. TK – 4) Corfman Middle (Gr. 5 – 8)	0.766	54
			TOTAL	**879**		**TOTAL**	**441**

Notes: DUs = Dwelling Units SF = Single-Family MF = Multiple-Family

(1) None of the proposed DUs constructed during Phase 4 would be located within the McCabe Enrollment District.

Source: (a) McCabe Union Elementary School District School Facility Fee Justification Report, February 2023.

TABLE 4.9-4. STUDENT GENERATION – HEBER ELEMENTARY SCHOOL DISTRICT

Development Phase	Time Frame	Dwelling Units (DUs)			Heber Elementary School District	Student Generation Rate (b)	Students
		SF	MF	Total			
1A	2025 - 2026	157	0	157	Heber Elem (Gr 5-8) Dogwood Elem (Gr TK-4)	0.5	79
3A	2034 - 2035	151	0	151	Heber Elem (Gr 5-8) Dogwood Elem (Gr TK-4)	0.5	76
3B	2036 - 2037	88	335	423	Heber Elem (Gr 5-8) Dogwood Elem (Gr TK-4)	0.5	212
Subtotal (Phases 1 – 3)		**396**	**335**	**731**	**Subtotal (Phases 1 – 3)**		**367**

TABLE 4.9-4. STUDENT GENERATION – HEBER ELEMENTARY SCHOOL DISTRICT

Development Phase	Time Frame	Dwelling Units (DUs)			Heber Elementary School District	Student Generation Rate (b)	Students
		SF	MF	Total			
4	2025-2039	422	268	690	Heber Elem (Gr 5-8) Dogwood Elem (Gr TK-4)	0.5	345
TOTAL		**818**	**603**	**1,421**	**TOTAL**		**712**

Notes: DUs = Dwelling Units SF = Single-Family MF = Multiple-Family
Source: (b) Level I Developer Fee Study for Heber Elementary School District, April 9, 2024.

TABLE 4.9-5. STUDENT GENERATION – CENTRAL UNION HIGH SCHOOL DISTRICT

Development Phase	Time Frame	Dwelling Units (DUs)			Student Generation Rate SF (c)	Student Generation Rate MF (c)	Students
		SF	MF	Total			
1A	2025 - 2026	157	0	157	0.175	0.111	27
1B	2026 -2027	157	0	157	0.175	0.111	27
2A	2029 - 2031	260	0	260	0.175	0.111	46
2B	2032 - 2033	159	196	355	0.175	0.111	50
3A	2034 - 2035	151	0	151	0.175	0.111	26
3B	2036 - 2037	88	335	423	0.175	0.111	53
3C	2038 - 2039	107	0	107	0.175	0.111	19
Subtotal (Phases 1 – 3)		**396**	**335**	**731**	**Subtotal (Phases 1 – 3)**		**248**
4	* *	422	268	690	0.175	0.5	104
TOTAL		**1,501**	**799**	**2,300**	**TOTAL**		**351**

Notes: ** Phase 4 develops Concurrent or Subsequent to TM 994
SF = Single-Family MF = Multiple-Family
Source: (c) Level I Developer Fee Study for Central Union High School District, April 22, 2024.

The Certified EIR included mitigation measures MM 4.12.3.1a and MM 4.12.3.1b to reduce impacts to schools. These measures required each project applicant to provide a fair share contribution for additional school facilities and services along and to consult with the applicable school district regarding the District's site sizing requirements. Implementation of these measures were found to reduce the potential effects related to an increased demand for school services to a minimum. Mitigation measure 4.12.3.1a would be replaced by MM PS-1 which requires payment of school fees in accordance with Government Code Section 65995 and SB 50. With mitigation, this impact is considered to be less than significant.

Parks

Development proposed in association with the McCabe Ranch II Specific Plan would require additional parkland, facilities, and personnel. The staffing and administrative needs for the park and recreational facilities would increase as a result increased population and additional park and recreational facilities proposed by the McCabe Ranch II Specific Plan. The estimated residential population in the project area is anticipated to increase by approximately 7,659 persons under build-out conditions. Based on the current Imperial County Parks and Recreation service standard of 3 acres per 1,000 persons, the Project would need to add approximately 23 acres of parkland to maintain County service standards. Similarly, the proposed Project would be required to provide approximately 32.3-acres of parklands to meet HPUD's standard of 5-acres per 1.000 persons.

The proposed Project contains parks and open space areas totaling approximately 60.11 acres (including IID easements), which would be located in all phases of the proposed Project. This amount of park space is consistent with and exceeds both County and HPUD parkland standards.

As demonstrated throughout Section 4.13.9 of this SEIR, the proposed Project is not expected to include or require construction or expansion of recreational facilities that would have an adverse physical effect on the environment. Further, with the additional 60.11-acres of parkland that would be provided by the Project, no substantial physical deterioration of existing parks or recreation facilities due to increased use would occur. The Certified EIR determined that implementation of MM 4.13.1, which requires dedication of a designated amount of park acreage, would reduce the potential effects related to demand for school services to a minimum. This measure applies to the proposed Project and has been revised to reflect the actual amount of parkland that would be provided (see Section 4.9.7.1). This impact is considered to be less than significant. No additional mitigation is required.

Other Public Facilities (Libraries)

As residential population grows on the project site, library use is anticipated to increase. Development of the proposed project could result in increased patronage of the closest libraries to the proposed project site. In addition, existing library facilities may not be adequate to serve the future needs of residents in the Town of Heber as well as the proposed project. Therefore, impacts to public libraries would be considered potentially significant. Development associated with the McCabe Ranch II project would be subject to the developer fees in place at the time an application is submitted for a building permit. The Certified EIR determined that implementation of MM 4.12.4.1, which requires a fair share contribution for additional library facilities and services would reduce the potential effects related to demand for school services to a minimum. This impact is considered to be less than significant. No mitigation is required.

4.9.7 Mitigation Measures

4.9.7.1. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Mitigation measure MM 4.12.3.1a., identified in the Certified EIR to reduce significant school facility impacts has been replaced by new mitigation that reflects California Government Code Section 65995 and SB 50. Mitigation measures MM 4.12.1, MM 4.12.1.2a, MM 4.12.1.2b, MM 4.12.2.2a, MM 4.12.2.2b, MM 4.12.3.1b, MM 4.12.4.1, and MM 4.13.1 continue to be applicable to the proposed Project. ~~Strikeout~~ formatting is used to depict those previously approved mitigation measures that are no longer applicable to the proposed Project.

MM 4.12.1.1 Construction Traffic Control Plan

For future developments within the McCabe Ranch II Specific Plan Area, a traffic control plan shall be prepared and implemented for each phase of development. The plan shall be submitted to the County of Imperial Public Works Department prior to the initiation of any construction activities and shall include measures to maintain adequate circulation and access for emergency response vehicles.

MM 4.12.1.2a Fair Share Contribution for Additional Fire Protection Services

For future development within the McCabe Ranch II Specific Plan Area, project applicants shall be required to pay a fair share contribution for additional fire facilities, equipment, and staff. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Fire Department.

MM 4.12.1.2b Fire Impact Fees

The Fire Impact Fees shall be imposed pursuant to Ordinance 1418 Section 2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study (TischlerBise, 2006). The value of the impact fees for each proposed project shall be assessed using the formula derived in the study. Specifically, Fire Impact Fees for residential development shall be calculated on a per capita basis and then converted to an appropriate amount by type of housing based on persons per housing unit. Impact Fees for non-residential development shall be calculated on a per-employee basis. The Fire Impact Fees shall be calculated based on the cost of maintaining the County's current level of service to residential and non-residential development. Fees collected shall only be used to mitigate the conditions created by the development, and such fees shall only be expended on facilities for which the fees were levied. This ensures that Fire Impact Fees will be used only to mitigate the impacts on fire service capabilities.

MM 4.12.2.2a Fair Share Contribution for Additional Law Enforcement Facilities

For future development within the McCabe Ranch II Specific Plan Area, the developer shall be required to pay a fair share contribution for additional law enforcement facilities, equipment, and staff, including a new sheriff substation. Construction of such facilities and the structure(s) size,

amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Sheriff's Office.

MM 4.12.2.2b Sheriff Impact Fees

Sheriff Impact Fees shall be imposed pursuant to Ordinance 1418 Section 2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study (TischlerBise, 2006). The value of impact fees calculated for each proposed project shall be assessed using the formula derived in the study. Specifically, Sheriff Impact Fees for residential development shall be calculated on a per capita basis and then converted to an appropriate amount by type of housing based on persons per housing unit. Sheriff Impact Fees for nonresidential development shall be calculated using nonresidential vehicle trips, as they are the best measure of the presence of people at nonresidential land uses. The Sheriff Impact Fees shall be calculated based on the cost of maintaining the County's current level of service to residential and non-residential development. Fees collected shall only be used to mitigate the conditions created by the development, and such fees shall only be expended on facilities for which the fees were levied. This ensures that Sheriff Impact Fees will be used only to mitigate the impacts on sheriff service capabilities.

~~**MM 4.12.3.1a Fair Share for Additional School Facilities**~~

~~For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to pay a fair share to assist in the construction of additional school facilities. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the applicable school districts.~~

~~*Timing/Implementation: Prior to the initiation of any site development or ground-breaking activities.*~~

~~*Enforcement/Monitoring: McCabe Union School District, Heber Elementary School District and Central Union High School District; ICPDSD.*~~

MM 4.12.3.1b Compliance with All Other School Related Local, State and Federal Regulations

For future school developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to consult with the applicable school district regarding the district's site sizing requirements, student and staff capacity, and compliance with all other school-related local, state, and federal regulations.

MM 4.12.4.1 Fair Share Contribution for additional libraries

For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to pay a fair share to assist in the construction of additional library facilities. Construction of such facilities and the structure(s) size, amount of equipment, and personnel required for these services shall be determined in consultation with the Imperial County Free Library and El Centro Public Library.

MM 4.13.1 Parkland Dedication

The proposed Project shall be conditioned to require dedication of a minimum of ~~51.6 acres~~ 60-acres of parkland.

Timing/Implementation: *As a condition of project approval.*

Enforcement/Monitoring: *ICPDSD.*

4.9.7.2. Newly Proposed Mitigation Measures

MM PS-1 Payment of School Impact Fees

For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall be required to pay the applicable school fees in compliance with Government Code Section 53080 or Section 65970 to the Central Union, Heber Elementary and/or McCabe Union School Districts, identified in each district's fee justification study. The payment of required school development fees would reduce the potential increase in demand to less than significant.

Timing/Implementation: *Prior to the initiation of any site development or ground-breaking activities.*

Enforcement/Monitoring: *McCabe Union School District, Heber Elementary School District and Central Union High School District; ICPDSD.*

4.9.8 Level of Significance After Mitigation

With implementation of the mitigation measures described above, public service impacts would be reduced to below a level of significance.

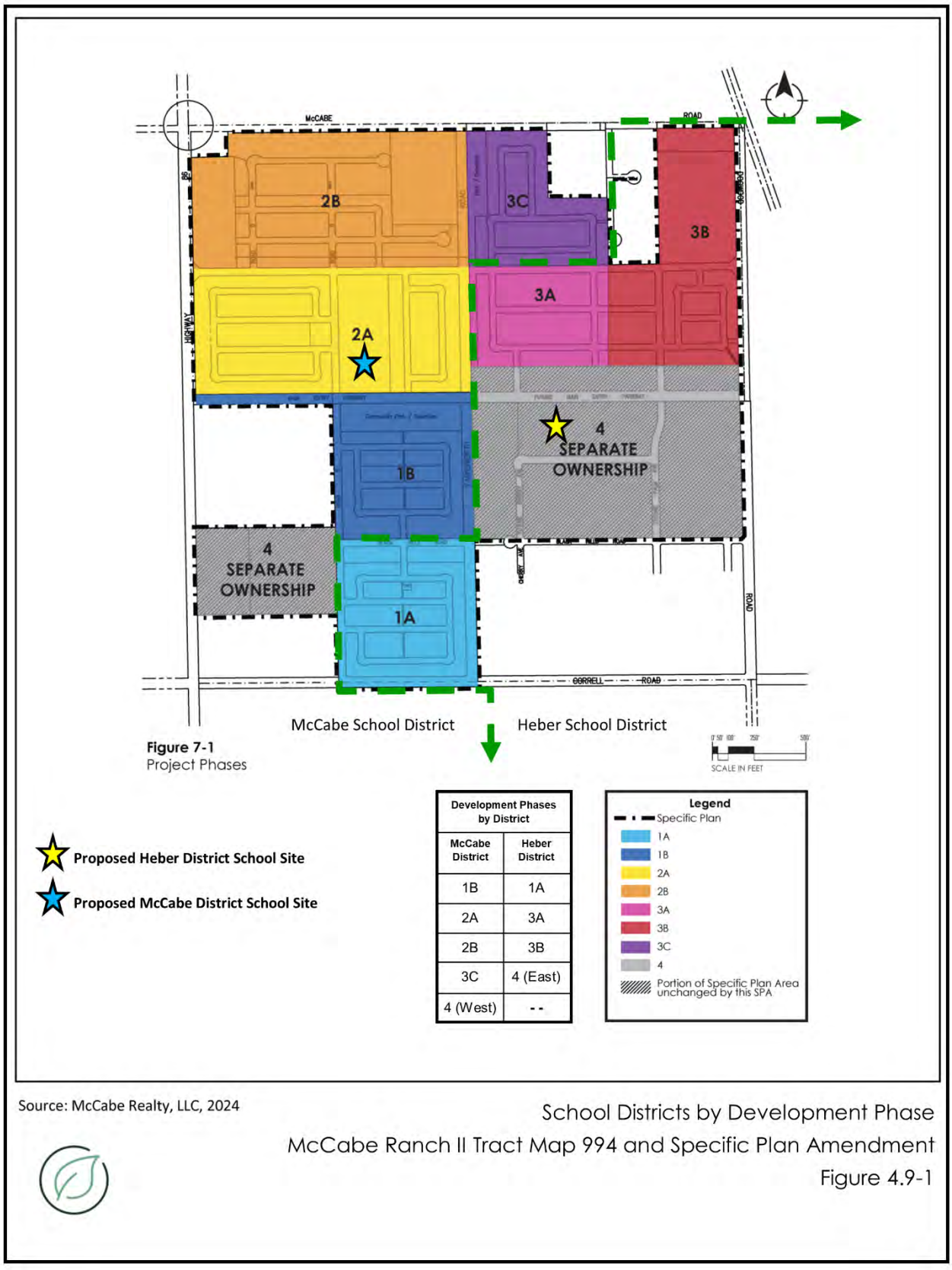


Figure 7-1
Project Phases

Source: McCabe Realty, LLC, 2024

School Districts by Development Phase
McCabe Ranch II Tract Map 994 and Specific Plan Amendment
Figure 4.9-1

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4.10. Transportation/Traffic

This section provides the supplemental analysis required to assess potential transportation and traffic impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment (proposed Project or Project). It also compares impacts of the proposed Project to those that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) as identified in the Certified EIR.

This section describes the existing and proposed circulation system in the vicinity of the Specific Plan and evaluates the Project's consistency with applicable agency regulations. Potential transportation and traffic impacts associated with the proposed TM 994 (Phases 1, 2 and 3 of the Specific Plan) are analyzed at a project level. Potential impacts from development of Phase 4 of the Specific Plan are generally analyzed at a programmatic level. Further, this section identifies specific and detailed measures from the Certified EIR that apply to the Project, or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant transportation and traffic impacts, where necessary.

The traffic analysis contained in the Certified EIR was based on the following technical traffic studies:

- Traffic Impact Analysis, McCabe Ranch II Specific Plan, PMC, April 2010 (Appendix B of the Final EIR)
- McCabe Ranch II Specific Plan, June 2010.

Traffic congestion and related analyses, such as automobile delays as measured by levels of service (LOS) at intersection and street segments are not considered a potentially significant effect on the environment under CEQA. Nevertheless, traffic operational analyses remain relevant for understanding traffic flow and circulation. The transportation and analysis contained in this SEIR is based on the *Limited Mobility Analysis prepared by Linscott, Law and Greenspan* (LLG, 2025), which is included as Appendix G in this SEIR. Please refer to Section 4.13 of the Draft SEIR for a discussion of vehicle miles traveled.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from public agencies and members of the public. The following provides a concise summary of issues raised by Caltrans. A detailed listing is provided in **Table 2 1**.

- A Local Mobility Analysis (LMA) should consider the effects on any upstream or downstream intersections; be based on reasonable speed and capacity for State highway; and specifically assess potential impacts caused by the project or from mitigation efforts that occur within Caltrans' Right-of-Way (R/W).

- A Vehicle Miles of Travel (VMT) based study should be provided for this project.
- Sidewalk and ADA curb ramp design shall comply with the requirements as stated in the Design Information Bulletin 82-06.
- Sight Distance exhibits need to be submitted for review for all new driveways and new minor street connections inside Caltrans' R/W during the design phase.
- All mitigation should be coordinated with Caltrans, be compatible with Caltrans concepts, meet Caltrans ultimate design and be installed prior to completing Phase 1 and construction of the proposed McCabe Elementary School.
- The access for Correll Road should be right-in,-right-out only and a raised median on SR-86 will be required at Correll Road.
- Explore options for comfortable, convenient, and connected bicycle and pedestrian facilities along this segment of SR-86 with Caltrans District 11, including the Complete Streets Program.
- Contact the Imperial County Transportation Commission (ICTC) regarding future transit needs along the western side of the McCabe Ranch Specific Plan Project area.
- Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.
- An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. Any work within Caltrans' R/W will require discretionary review and approval by Caltrans.
- The applicant should donate the required R/W according to Caltrans standards and prepare a Right-of-Way Map depicting the dedication as a condition of approval.
- Perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction, is required.

4.10.2 Summary of Certified EIR Findings

Potential impacts to traffic and transportation associated with development within the McCabe Ranch II Specific Plan area were evaluated in Section 4.14 of the Certified EIR. The Certified EIR analyzed the impacts of Phase I, Phases I and II, Phases I, II, and III [(1)], and the total Project (Phases I, II, III, and IV) compared to conditions during the year when development was projected to occur. This analysis includes intersection, street segment, and freeway mainline operations.

[1] The Certified EIR assigned Roman numerals to development phases of the McCabe Ranch II Specific Plan.

Project Traffic and Consistency with Adopted Plans

The Certified EIR found that development of the McCabe Ranch II Specific Plan would add new vehicle, bicycle and pedestrian trips to key street segments and intersections in the Project vicinity. The Certified EIR concluded that with the addition of trips generated by each development phase, the level of service of several intersections and street segments in the study area would not meet the relevant jurisdiction's minimum LOS standard under all scenarios. The identified performance standard failures were considered significant impacts requiring mitigation. Mitigation measures forming a list of transportation improvements, including M**M 4.14.1a through MM 4.14.1c and MM 4.14.2a through MM 4.14.2c**, were prescribed in the Certified EIR to mitigate direct and/or cumulative impacts to below a level of significance.

Emergency Access

The Certified EIR also determined that the buildout of the McCabe Ranch II Specific Plan would result in the construction of new roadways, intersections and project access driveways that could change emergency access. This impact was considered potentially significant and the Certified EIR identified mitigation measures **MM 4.14.5a and MM 4.14.5b**. These measures required all future developments to be reviewed by the Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies regarding adequate emergency access and to include adequate emergency access locations.

Parking

The Certified EIR found buildout of the McCabe Ranch II Specific Plan would increase demand for on-site parking facilities and result in a **potentially significant** impact on parking capacity. Mitigation measure **MM 4.14.6** was identified which requires that subsequent project-level planning and/or environmental review will be required for subsequent projects within the McCabe Ranch II Specific Plan area, to evaluate the subsequent project's impact on parking capacity and identify mitigation measures.

Air Traffic Patterns

The Certified EIR found that the McCabe Ranch II Specific Plan is not located near an existing airport and does not contain any elements that would significantly change air travel patterns. This impact was deemed to be less than significant. Nevertheless, because the cost of implementing the McCabe Ranch II Specific Plan would exceed $500,000, the Specific Plan required review by the Imperial County Airport Land Use Commission (ALUC), to verify the project's consistency with the Airport Land Use Compatibility Plan. In addition, subsequent development projects within the McCabe Ranch II Specific Plan area would be subject to review by the ALUC if the development project exceeds $500,000 in cost or otherwise triggers review through specific project features.

Design Feature Hazards/Incompatible Uses

The Certified EIR determined that the McCabe Ranch II Specific Plan would not substantially increase hazards due to a design feature (e.g., sharp curs or dangerous intersections). However, McCabe Road and Dogwood Road both intersect the UPRR which could result in incompatible uses between the railroad and vehicular, bicycle and pedestrians crossing the track. This was considered a potentially significant impact. The Certified EIR concluded that implementation of mitigation measure **MM 4.14.4** was identified to reduce potential hazards to below a level of significance.

4.10.3 Environmental Setting

4.10.3.1. Existing Transportation Network

The principal roadways in the vicinity of the proposed project are briefly described below. Roadway classification was determined from a review of the County of Imperial and City of El Centro Circulation Elements, field observations, and information obtained from Caltrans.

Roads and Streets

Interstate 8 (I-8) is a four-lane divided interstate freeway with an east-west route through the County of Imperial between San Diego, California and Yuma, Arizona. I-8 has complete grade separations at all interchanges within the study area. The posted speed limit is 70 mph.

Imperial Avenue is classified as a four-lane Arterial in the City of El Centro Mobility Element. Imperial Avenue is currently constructed as a four-lane undivided roadway between I-8 and Wake Avenue, and a two-lane undivided roadway between Wake Avenue and Danenberg Drive. Sidewalks are provided on both sides of the roadway between I-8 and Wake Avenue, and on the east side only between Wake Avenue and Danenberg Drive. Class 2 bike lanes are provided on both sides between I-8 and Wake Avenue. The posted speed limit is 35 mph.

Clark Road is classified as a four-lane Arterial in the City of El Centro Mobility Element. Imperial Avenue is currently constructed as a four-lane divided roadway between Danenberg Drive and Palmview Avenue and a two-lane undivided roadway between Palmview Avenue and McCabe Road. Sidewalks are provided on the west side only between I-8 and Palmview Avenue. The posted speed limit is 35 mph.`

State Route 86 (SR-86) is classified as a six-lane Expressway in the County of Imperial Circulation Element. SR-86 is currently constructed as a two-lane undivided roadway between Aurora Drive and I-8, a three-lane divided roadway between Wake Avenue and Danenberg Drive, and a two-lane undivided roadway between Danenberg Drive and Heber Road. Sidewalks are provided on both sides between Aurora Drive to I-8, and on the east side only between Wake Avenue and Danenberg Drive and between Willow Bend Drive and Countryside Drive. The posted speed limit is 40 mph.

Dogwood Road is classified as a six-lane Prime Arterial in the County of Imperial Circulation Element. Dogwood Road is currently constructed as a four-lane undivided roadway between I-8 and McCabe Road and as a two-lane undivided roadway between McCabe Road and Heber Road. Sidewalks are provided on the east side only between I-8 and Danenberg Drive, and on both sides of the roadway between Black Hills Road and Correll Road. The posted speed limit is 40 mph.

McCabe Road is classified as a six-lane Prime Arterial in the County of Imperial Circulation Element. However, within the City of El Centro's Mobility Element, McCabe Road is designated as a four-lane Arterial (City of El Centro, 2021) McCabe Road is currently constructed as a two-lane undivided roadway between La Brucherie Road and Dogwood Road. The posted speed limit is 40 mph.

Correll Road is classified as a two-lane Minor Arterial between Dogwood Road and SR-111 in the County of Imperial Circulation Element. Correll Road is currently constructed as a four-lane divided roadway between its western terminus and Heber Avenue, and two-lane undivided roadway between Heber Avenue and Pitzer Road. Sidewalks are provided on both sides between its western terminus and Heber Avenue, and on the south side only between Rockwood Road and Pitzer Road. The posted speed limit is 25 mph.

Airports

The two closest primary public use airports to the Project site are the Imperial County Airport and the Calexico International Airport. The Imperial County Airport is located in the City of Imperial approximately six (6) miles northwest of the Project site on SR 86. The Imperial County Airport is primarily a general aviation facility but is served by one commercial airline. The Calexico International Airport is located in the City of Calexico approximately 8 miles south of the Project site near the U.S.-Mexico Border, west of SR 111. The Calexico International Airport is a general aviation facility.

Railroads

A Union Pacific Railroad (UPRR) freight line that traverses the whole of Imperial County from the Mexico border into Riverside County is located east and north of the SPA. This rail line is aligned in a northwest–southeast alignment immediately northeast of the project area. The railroad line crosses Dogwood Road north of the Project site between the intersections of Dogwood Road and McCabe Road (north) and Dogwood Road and McCabe Road (south). There are no stops or passenger rail service within the Project area.

Transit Service

Imperial Valley Transit (IVT) provides an inter-city fixed route bus system, with existing service routes between El Centro and Calexico that provide transit services on Dogwood Road along the east side of the Project site (Imperial Valley Transit, 2025). Specifically, Routes 1N and 1S provide

public transit services every 30 minutes between 6:00 AM and 11:00 PM weekdays (Imperial Valley Transit, 2025). Hourly service is provided on Saturdays, from the hours of 7:00 AM to 7:00 PM. Sundy service is restricted to every two hours, from 7:00 AM to 5:00 PM. The nearest bus stop is located just north of the intersection of Dogwood Road & Correll Road and provides a bus shelter and seating within the bus turnout.

Parking

Currently, the McCabe Ranch Specific Plan area is occupied by farmland, and no on-site parking is required or provided.

Bicycle Facilities

Portions of Dogwood Road in the Project vicinity have been upgraded as a Class 2 bicycle lane. No other bicycle improvements have been made in the immediate Project vicinity.

Pedestrian Facilities

In the vicinity of the SPA, pedestrian facilities (sidewalks) are provided along Dogwood Road, south of W. Black Hills Road. Correll Road south of the SPA, between Dogwood Road and N. Oak Avenue, has also been improved with sidewalks. East of the SPA, sidewalks are provided along Correl Road, between Dogwood Road and the UPPR tracks. No other pedestrian improvements have been made in the immediate Project vicinity.

The existing transportation conditions in the Project area are presented on **Figure 4.10-1 and Figure 4.10-2.**

4.10.3.2. Existing Traffic Volumes

Peak hour intersection turning movement volume and street segment average daily traffic (ADT) volume counts were conducted on either Thursday, March 21, 2024, or Wednesday, October 23, 2024, while schools in the area were in session. Existing traffic volumes in the study area are depicted on **Figure 4.10-3 and Figure 4.10-4.**

Traffic Study Area Selection

Effective evaluation of the traffic impacts associated with the proposed Project requires an understanding of the existing transportation system within the Project area. The Project study area includes the following 36 intersections and 13 street segments. These locations were chosen in conjunction with County staff and represent the location that will be most impacted by Project traffic. The numbering of these intersections and street segments corresponds with the numbering in **Figures 4.10-1 and 4.10-2.**

Intersections

1. Ross Ave. / Imperial Ave.
2. Ross Ave./ 8th Street
3. Ross Ave./ SR-86 (*Caltrans*)
4. Ross Ave./ Dogwood Road
5. Aurora Drive / 8th Street
6. Aurora Drive / SR-86 (*Caltrans*)
7. Ocotillo Drive / Imperial Ave.
8. I-8 WB Ramps / SR-86 (*Caltrans*)
9. I-8 EB Ramps / SR-86 (*Caltrans*)
10. I-8 WB Ramps / Dogwood Rd. (*Caltrans*)
11. I-8 EB Ramps / Dogwood Rd (*Caltrans*)
12. Wake Ave./ Imperial Ave.
13. Wake Ave./ SR-86 (*Caltrans*)
14. Danenberg Dr./ Clark Road
15. Danenberg Dr. / SR-86 (*Caltrans*)
16. Danenberg Drive / Farnsworth Lane
17. Danenberg Drive / Dogwood Road
18. W McCabe Road / Austin Road
19. W McCabe Road / La Brucherie Road
20. W McCabe Road / Clark Road
21. W McCabe Road / SR-86 (*Caltrans*)
22. W McCabe Rd / Farnsworth Ln / Proj. Dwy. A
23. W McCabe Road / Dogwood Road
24. E McCabe Road / Dogwood Road
25. E McCabe Road / Pitzer Road
26. E McCabe Road / SR-111 (*Caltrans*)
27. SR-86 / Project Driveway B (*Caltrans*)
28. Dogwood Road / Project Driveway C
29. SR-86 / Project Driveway D (*Caltrans*)
30. Dogwood Road / Project Driveway E
31. Dogwood Rd / Black Hills Rd /Proj. Dwy F
32. Correll Road / Project Driveway G
33. Correll Road / Project Driveway H
34. Correll Road / Dogwood Road
35. Heber Road / Dogwood Road (*Caltrans*)
36. Heber Road / Pitzer Road (*Caltrans*)

Street Segments

1. Imperial Ave., I-8 to Danenberg Dr.
2. Clark Rd, Danenberg Dr. to McCabe Road
3. SR-86, Aurora Dr. to I-8 (*Caltrans*)
4. SR-86, Wake Ave. to Danenberg Dr. (*Caltrans*)
5. SR-86, Danenberg Dr. to McCabe Road (*Caltrans*)
6. SR-86, McCabe Road to Heber Road *(Caltrans)*
7. Dogwood Road, I-8 to Danenberg Dr.8. Dogwood Rd, Danenberg Dr. to McCabe Rd
9. Dogwood Road, McCabe Road to Heber Road
10. McCabe Rd, La Brucherie Road to Clark Rd
11. McCabe Road, Clark Road and SR-86
12. McCabe Road, SR-86 and Farnsworth Lane
13. McCabe Rd, Farnsworth Ln and Dogwood Rd

Intersections. Signalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 19 of the *Highway Capacity Manual (HCM) 6th Edition*, with the assistance of the Synchro (version 11)

computer software. The delay values (represented in seconds) were qualified with a corresponding intersection LOS.

Unsignalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay (delay) and LOS was determined based upon the procedures found in Chapters 20 and 21 of the *HCM 6th Edition*, with the assistance of the Synchro (version 11) computer software.

Street Segments. Street segment analysis is based upon the comparison of ADTs to Roadway Classification Tables in the County of Imperial's Circulation and Scenic Highway Element or the City of El Centro's Mobility Element. These tables provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.

Level of Service (LOS) Standards

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. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments. Per the County of Imperial's Circulation Element, the acceptable LOS threshold for an intersection and street segment is C or higher. LOS on State Highways, in some cases, deteriorates to LOS D. However, the County of Imperial has no jurisdiction over State Highways and planning for these facilities is undertaken by Caltrans. City roads that do intersect with State routes should be given special consideration because delays at intersections tend to deteriorate operating conditions along street segments.

Caltrans typically utilizes the published *Institute of Transportation Engineers (ITE) Guidelines for Transportation Impact Studies* (dated May 2019) to establish thresholds and methodology for this LMA.

Table 4.10–1 below indicates when a project's effect on the roadway system is considered to justify the need for roadway improvements. That is, if a project's traffic effect causes the values in this table to be exceeded, roadway improvements should be considered as follows on a case-by-case basis. It should be noted that if the pre-project operation is already below standards, the substantial effect with the addition of project traffic would be considered a cumulative effect, and a fair share of responsibility for improvements should be applied. However, if the project causes the operation to degrade to an unacceptable level, then the project would be responsible for constructing the necessary improvements. Since the County of Imperial does not have an established threshold at the time this report was prepared, it was deemed reasonable to utilize the threshold in **Table 4.10–1.**

TABLE 4.10-1: THRESHOLDS TO DETERMINE WHEN TRANSPORATION FACILITY IMPROVEMENTS ARE NEEDED

Level of Service with Project (a)	Allowable Increase Due to Project (b)	
	Roadway Segments	Intersections
	V/C	Delay (sec.)
D, E & F	0.02	2

Notes:

a. All LOS measurements are based upon HCM procedures for peak-hour conditions. However, V/C ratios for Roadway Segments may be estimated on an ADT/24-hour traffic volume basis. The acceptable LOS for roadways and intersections is generally "C."

b. If a proposed project's traffic causes the values shown in the table to be exceeded, it is considered to be a substantial effect. The project applicant shall then identify feasible improvements that will restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see footnote a above), the project applicant shall be responsible for mitigating the project's traffic impacts.

V/C = Volume to Capacity Ratio

Delay = Average control delay per vehicle measured in seconds for intersections

LOS = Level of Service

4.10.3.3. Existing Peak Hour Intersection Operations

Table 4.10-2 summarizes the existing peak hour intersection operations. As shown in **Table 4.10-2**, the majority of study area intersections within the County of Imperial and City of El Centro jurisdictions are calculated to operate at LOS C/D or better during both the AM and PM peak hours. Similarly, the majority of study area intersections within Caltrans' jurisdiction are calculated to operate at LOS D or better during both the AM and PM peak hours. However, the intersections within the County of Imperial or City of El Centro that are shown below operated at LOS E and LOS F during the AM and/or PM peak hours. Those intersections under Caltrans' jurisdiction that operated at LOS D, E or F during the AM and/or PM peak hour are also listed below:

- Aurora Dr. / 8th Street – LOS F during the AM peak hour and LOS E during the PM peak hour
- Wake Avenue / SR-86 (*Caltrans jurisdiction*) – LOS D during the AM peak hour and LOS F during the PM peak hour
- W McCabe Road / Austin Road – LOS F during the AM peak hour
- W McCabe Road / La Brucherie Road – LOS F during the AM peak hour
- W McCabe Road / Clark Road – LOS F during the AM peak hour, and
- Dogwood Road / Black Hills Road / Project Driveway F – LOS D during the PM peak hour

TABLE 4.10-2. EXISTING INTERSECTION OPERATIONS

No.	Intersection	Control Type	Peak Hour	Existing	
				Delay (seconds)	LOS
1	Ross Ave / Imperial Ave	Signal	AM	44.6	D
			PM	30.8	C
2	Ross Ave / 8th St	Signal	AM	25.7	C
			PM	18.6	B
3	Ross Ave / SR-86 (*Caltrans jurisdiction*)	Signal	AM	46.2	D
			PM	38.7	D
4	Ross Ave / Dogwood Rd	Signal	AM	27.6	C
			PM	48.6	D
5	Aurora Dr / 8th St	AWSC	AM	**79.3**	**F**
			PM	**38.7**	**E**
6	Aurora Dr / SR-86 (*Caltrans jurisdiction*)	Signal	AM	26.4	C
			PM	26.0	C
7	Ocotillo Dr / Imperial Ave	Signal	AM	44.9	D
			PM	28.3	C
8	I-8 WB Ramps / SR-86 (*Caltrans jurisdiction*)	Signal	AM	22.9	C
			PM	24.1	C
9	I-8 EB Ramps / SR-86 (Caltrans jurisdiction)	Signal	AM	23.6	C
			PM	37.4	D
10	I-8 WB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	7.9	A
			PM	7.9	A
11	I-8 EB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	11.9	B
			PM	15.5	B
12	Wake Ave / Imperial Ave	Signal	AM	29.9	C
			PM	23.8	C
13	Wake Ave / SR-86 (Caltrans jurisdiction)	Signal	AM	46.1	D
			PM	92.3	F
14	Danenberg Dr / Clark Rd	TWSC	AM	9.6	A
			PM	10.2	B
15	Danenberg Dr / SR-86 *(Caltrans jurisdiction*)	Signal	AM	11.2	B
			PM	19.6	B
16	Danenberg Dr / Farnsworth Ln	TWSC	AM	10.3	B
			PM	14.2	B
17	Danenberg Dr / Dogwood Rd	Signal	AM	17.6	B
			PM	23.5	C
18	W McCabe Rd / Austin Rd	AWSC	**AM**	**63.4**	**F**
			PM	9.5	A
19	W McCabe Rd / La Brucherie Rd	AWSC	**AM**	**81.7**	**F**
			PM	10.1	B
20	W McCabe Rd / Clark Rd	Signal	**AM**	**54.5**	**F**
			PM	12.8	B

TABLE 4.10-2. EXISTING INTERSECTION OPERATIONS

No.	Intersection	Control Type	Peak Hour	Existing	
				Delay (seconds)	LOS
21	W McCabe Rd / SR-86 (*Caltrans jurisdiction*)	Signal	AM	19.0	B
			PM	20.3	C
22	W McCabe Rd / Farnsworth Ln Project Dwy A	TWSC	AM	14.5	B
			PM	15.1	C
23	W McCabe Rd / Dogwood Rd	Signal	AM	10.7	B
			PM	15.1	B
24	E McCabe Rd / Dogwood Rd	Signal	AM	8.2	A
			PM	7.6	A
25	E McCabe Rd / Pitzer Rd	Signal	AM	27.8	C
			PM	29.2	C
26	E McCabe Rd / SR-111 (*Caltrans jurisdiction*)	Signal	AM	36.2	D
			PM	34.6	C
27	SR-86 / Project Driveway B *(Caltrans jurisdiction)*	DNE	AM	- -	- -
			PM	- -	- -
28	Dogwood Rd / Project Driveway C	DNE	AM	- -	- -
			PM	- -	- -
29	SR-86 / Project Driveway D *(Caltrans jurisdiction)*	DNE	AM	- -	- -
			PM	- -	- -
30	Dogwood Rd / Project Driveway E	DNE	AM	- -	- -
			PM	- -	- -
31	Dogwood Rd / Black Hills Rd / Project Driveway F	TWSC	AM	24.1	C
			PM	32.5	D
32	Correll Rd / Project Driveway G	DNE	AM	- -	- -
			PM	- -	- -
33	Correll Rd / Project Driveway H	DNE	AM	- -	- -
			PM	- -	- -
34	Correll Rd / Dogwood Rd	Signal	AM	31.8	C
			PM	24.5	C
35	Heber Rd / Dogwood Rd (*Caltrans jurisdiction*)	AWSC	AM	**42.3**	**E**
			PM	29.7	D
36	Heber Rd / Pitzer Rd (*Caltrans jurisdiction*)	TWSC	AM	14.2	B
			PM	14.9	B

Notes:

AWSC = All-Way Stop Controlled intersection.

Delay = Average delay expressed in seconds per vehicle.

DNE = Does not exist under Existing Condition

LOS = Level of Service.

Net Diff. = increase in delay due to project.

Project Dwy = Project Driveway

Signal = Signalized Intersection

TWSC = Two-Way Stop Controlled intersection.

- - = No delay or LOS calculated; Intersection does not exist in Existing Condition

Source: Linscott, Law & Greenspan, 2025 (Appendix G).

4.10.3.4. Existing Daily Street Segment Operations

Table 4.10-3 summarizes the existing street segment operations. As shown in **Table 4.10-3**, all of the study area street segments are calculated to operate at LOS C or better with the exception of:

- Dogwood Road between McCabe Road and Heber Road – LOS E

TABLE 4.10-3. EXISTING STREET SEGMENT OPERATIONS

Street Segment	Functional Classification	Capacity (LOS E)[(a)]	Existing		
			ADT	LOS	V/C
Imperial Ave					
I-8 to Danenberg Dr	2-Lane Arterial	18,000	4,790	A	0.266
Clark Rd					
Danenberg Dr to McCabe Rd	2-Lane Arterial	18,000	11,340	B	0.630
SR-86 *(Caltrans*)					
Aurora Dr. to I-8	4-Lane Arterial	36,000	21,660	A	0.602
Wake Ave to Danenberg Dr.	3-Lane Arterial	27,000	13,140	A	0.487
Danenberg Dr.to McCabe Rd	2-Lane Arterial	18,000	10,130	A	0.563
McCabe Rd to Heber Rd	2-Lane Minor Collector	16,200	5,370	C	0.331
Dogwood Rd					
I-8 to Danenberg Dr.	4-Lane Arterial	36,000	16,810	A	0.467
Danenberg Dr.to McCabe Rd.	4-Lane Arterial	36,000	12,390	A	0.344
McCabe Rd to Heber Rd.	2-Lane Minor Collector	16,200	**14,040**	**E**	**0.867**
McCabe Rd					
La Brucherie Rd. to Clark Rd.	2-Lane Minor Collector	16,200	6,610	C	0.408
Clark Rd. to SR-86	2-Lane Minor Collector	16,200	4,400	C	0.272
SR-86 to Farnsworth Ln.	2-Lane Minor Collector	16,200	5,010	C	0.309
Farnsworth Ln to Dogwood Rd.	2-Lane Minor Collector	16,200	5,560	C	0.343

Notes:
(a) Capacities based on County of Imperial or City of El Centro Roadway Classification Tables.
ADT = Average Daily Traffic Volumes. LOS = Level of Service. V/C = Volume to Capacity Ratio

Source: Linscott, Law & Greenspan, 2025 (Appendix G).

4.10.4 Regulatory Setting

4.10.4.1. State

California Department of Transportation

The California Department of Transportation (Caltrans) has jurisdiction over state highways and establishes maximum load limits for trucks and safety requirements for oversized vehicles that operate on highways. Transportation and traffic impacts are regulated by Caltrans codes pertaining to licensing, size, weight, and load of vehicles operated on highways (California Vehicle Code,

Division 15, Chapters 1 through 5) as well as the Street and Highway Code (Code §§660-711, 670-695) which requires permits from Caltrans for any roadway encroachment during truck transportation and delivery. The Street and Highway Code includes regulations for the care and protection of state and county highways and provisions for the issuance of written permits and requires permits for any load that exceeds Caltrans weight, length, or width standards for public roadways. All proposed or requirement improvements to Caltrans facilities related to implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment Project would comply with all applicable Caltrans rules, regulations, policies, plans and procedures.

Senate Bill 743

Senate Bill 743/State CEQA Guidelines Senate Bill (SB) 743, signed in 2013, required a change in the way that transportation impacts are analyzed under CEQA. Historically, environmental review of transportation impacts has focused on the delay vehicles experience at intersections and roadway segments, as expressed in LOS. The legislation established that once new guidelines were certified by the Secretary of the Natural Resources Agency, automobile delay, as described solely by LOS or other similar measures of traffic congestion, shall not be considered a significant impact on the environment. Local jurisdictions are allowed to consider LOS with regard to local general plan policies, zoning codes, conditions of approval, thresholds, and other planning requirements. New criteria for measuring traffic impacts under CEQA are to focus on the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses.

State CEQA Guidelines Section 15064.3 was adopted in December 2018 to implement SB 743. In addition to establishing VMT as the most appropriate measure of transportation impacts, and shifting away from LOS, the primary elements of this section are as follows:

- Reiterates that a project's adverse effect on automobile delay shall not constitute a significant environmental impact;
- Creates a rebuttable presumption of no significant transportation impacts for (a) land use projects within 0.5-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allows a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Gives lead agencies discretion to select a methodology to evaluate a project's VMT but requires disclosure of that methodology in the CEQA documentation. Lead agencies are required to comply the with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the State Office of Planning and Research published a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), to

provide guidance in the calculation and application of VMT analyses within CEQA documents.

4.10.4.2. Local

Circulation Element of the General Plan

The Imperial County General Plan Circulation and Scenic Highways Element (CSHE) is intended to provide a plan to accommodate a pattern of concentrated and coordinated growth, providing both regional and local linkage systems between unique communities, and its neighboring metropolitan regions while protecting and enhancing scenic resources within both rural and urban scenic highway corridors. The CSHE policies related to the proposed Project are outlined below. **Table 4.10-4** summarizes the proposed Project's consistency with the applicable General Plan policies.

While this Draft SEIR analyzes the proposed Project's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Planning Commissioners and Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 4.10-4: CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS AND OBJECTIVES

General Plan Policies and Objectives	Consistency	Analysis
Circulation and Scenic Highways Element (CSHE)		
Safe, Convenient, and Efficient Transportation System		
CSHE Goal 1: The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment. • **CSHE Objective 1.2** Require a traffic analysis for any new development which may have a significant impact on County roads.	Yes	A Limited Mobility Analysis has been prepared (Appendix G) which demonstrates that the proposed Project, with the incorporation of mitigation measures, would not have a significant impact on County roads or intersections in the vicinity of the Project.
• **CSHE Objective 1.3** Ensure safe and coordinated traffic patterns, contiguous growth, and promote a planned and consistent development around city/township areas. Require that coordination with other jurisdictions, including the cities and CALTRANS results in a coordinated system that is consistent in classification, R/W and improvement standards. When annexations are proposed, projects must provide consistent roadway standards.	Yes	The McCabe Ranch II Specific Plan's Circulation Plan has been prepared specifically to ensure safe and secure traffic patterns are developed and are consistent with County and City of El Centro development plans. Coordination with the County Department of Public Works, City of El Centro and CALTRANS was completed in preparation of the Specific Plan to Circulation Plan is consistent with the roadway classifications, rights-of-way and improvement standards of the County of Imperial and with Caltrans.

TABLE 4.10-4: CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS AND OBJECTIVES

General Plan Policies and Objectives	Consistency	Analysis
This is intended to provide "throughways" that allow for the flow of traffic at LOS "C" or better throughout the system, both in cities as well as the County.		Final plans for subsequent projects will also be reviewed by the County, the City of El Centro, and/or CALTRANS to ensure proposed roadway improvements are consistent the plans and policies of the jurisdictions within which each improvement would be located.
• **CSHE Objective 1.5** Encourage the balance of employment, services, and housing throughout the County to preclude future traffic congestion. The result of balancing housing and employment demands at a community scale allows residents to live and work in the same area, potentially decreasing demand on inter-regional transportation facilities.	Yes	The McCabe Ranch II TM 994 and Specific Plan amendment consists of a well-rounded community, providing a variety of housing types, schools, community facilities, and parks, along with both "village" commercial and medium commercial areas. A major goal of the Project is to provide housing opportunities for varying incomes and stages of life. The provision of mixed uses (i.e., residential, parks, schools, and commercial uses) provides an opportunity for residents to live, work and recreate in the same area , which decreases impacts to local transportation infrastructure.
• **CSHE Objective 1.11** Improve County circulation system roadways in concert with land development to ensure sufficient levels of service.	Yes	As discussed in Chapter 3.0, the proposed Project includes numerous improvements to existing roads to provide adequate circulation and vehicular access to the area. Additionally, mitigation measures have been incorporated into the Project to ensure that sufficient levels of services are maintained during each implementation phase.
• **CHSE Objective 1.12** Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on existing roadways and intersection to a level of service (LOS) worse than "C" without providing appropriate mitigations to existing infrastructure.	Yes	Mitigation measure MM 4.14.6 would ensure that the Project provides adequate parking. Additionally, MM TR-1, MM TR-2. MM TR-3 and MM 4.14.6 require the applicant to construct roadway and/or intersection improvements, or contribute a fair share towards their construction such that minimum LOS standards are maintained.

Source: County of Imperial Circulation and Scenic Highway Element, 2008.

4.10.5 Analysis of Project Effects and Significance Determination

This section presents the significance criteria used for considering project impacts related to transportation and traffic, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

4.10.5.1. Thresholds of Significance

The following thresholds for measuring a project's environmental impacts are based on State CEQA Guidelines Appendix G. For the purposes of this Draft EIR, transportation and circulation impacts are considered significant if the following could result from implementation of the proposed project if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4. Result in inadequate emergency access.

The County of Imperial's standards for determining significance (relative to the first threshold listed above) were used to assess the Project's direct and cumulative impact on intersections, street segments, and freeway mainline. These standards focus on the Project's direct impact on intersections and roadway segments compared to existing conditions. They also focus on the Project's incremental impact on cumulative operations of intersections and roadway segments when other proposed related projects that could add traffic in the future are considered.

Direct Impacts

The County of Imperial has established LOS C or better as the acceptable level of service at intersections and roadway segments. In general, a location operating at LOS C or better under existing conditions that degrades to LOS D or worse due to project traffic is considered a significant direct impact. A location operating at LOS D or E under existing conditions that degrades is considered a substantial "direct impact" based on criteria identified in **Table 4.10-5**. If the intersection or roadway segment is currently operating at LOS F, the project would have a substantial "cumulative impact" if it causes an intersection delay by 10 or more seconds or increases the roadway segment volume to capacity (V/C) ratio by more than 0.09, respectively.

It is important to note that the City of El Centro has established that LOS D as acceptable on SR 86 (4th Street) between I-8 and Main Street and on Dogwood Avenue between I-8 and Evan Hewes Highway. However, for purposes of this SEIR, the more conservative County of Imperial LOS C standard is utilized as an acceptable level of service.

For mainline freeway operations, Caltrans endeavors to maintain an LOS between LOS C and LOS D, though, as noted in *Caltrans' Guide for the Preparation of Traffic Impact Studies*, they recognize this may not always be possible. Caltrans indicates that when a freeway is operating at an acceptable LOS, that should be maintained.

Cumulative Traffic Impacts

Per the *County of Imperial Circulation and Scenic Highway Element (Section II.C, Future Traffic Volume Forecasts)*, traffic on SR-86 is expected to increase by approximately one-half of a percent annually within the immediate vicinity of the Project site between the Year 2025 and the Year 2050. This calculation accounts for ambient growth resulting from population growth and cumulative projects that will add traffic to the study area between the date traffic counts were conducted and the various McCabe Ranch II phases. Therefore, to account for this ambient growth, a minimum growth rate of 0.5% per year was applied. The following growth rates were applied to the Existing traffic volumes for each study phase: Year 2027 (2% for 3 years), Year 2033 (slightly more than 0.5% per year for 9 years), Year 2039 (0.67% per year for 15 years) and Year 2040 (1% for 16 years) traffic volumes. Appendix G contains excerpts from the County of Imperial Circulation Element.

TABLE 4.10-5. DIRECT AND CUMULATIVE IMPACT CRITERIA

Existing	Existing + Project	Existing + Project + Cumulative Projects	Impact Type
Intersections			
LOS C or better	LOS C or better	LOS C or better	None
LOS C or better	LOS C or better and project adds < 2.0 seconds of delay	LOS D or worse	None
LOS C or better	LOS C or better and project adds > 2.0 seconds of delay	LOS D or worse	Cumulative
LOS C or better	LOS D or worse	LOS D or worse	Direct
LOS D	LOS D and project adds < 2.0 seconds of delay	LOS D or worse	None
LOS D	LOS D and project adds > 2.0 seconds of delay	LOS D or worse	Cumulative
LOS D	LOS E or F	LOS E or F	Direct
LOS E	LOS E and project adds < 2.0 seconds of delay	LOS E or F	None
LOS E	LOS E and project adds > 2.0 seconds of delay	LOS E or F	Cumulative
LOS E	LOS F	LOS F	Direct
LOS F	Project add < 2.0 seconds of delay	LOS F	None
LOS F	Project adds 2.0 to 9.9 seconds of delay	LOS F	Cumulative
LOS F	Project adds 10.0 or more seconds of delay	LOS F	Direct
Street Segments (1)			
LOS C or better	LOS C or better	LOS C or better	None
LOS C or better	LOS C or better and project increases V/C by < 0.02	LOS D or worse	None
LOS C or better	LOS C or better and project increase V/C by >0.02	LOS D or worse	Cumulative
LOS C or better	LOS D or worse	LOS D or worse	Direct[1]
LOS D	LOS D and project increases V/C by < 0.02	LOS D or worse	None
LOS D	LOS D and project increases V/C by > 0.02	LOS D or worse	Cumulative

TABLE 4.10-5. DIRECT AND CUMULATIVE IMPACT CRITERIA

Existing	Existing + Project	Existing + Project + Cumulative Projects	Impact Type
LOS D	LOS E or F	LOS E or F	Direct
LOS E	LOS E and project increases V/C by < 0.02	LOS E or F	None
LOS E	LOS E and project increases V/C by > 0.02	LOS E or F	Cumulative
LOS E	LOS F	LOS F	Direct
LOS F	Project increases V/C by < 0.02	LOS F	None
LOS F	Project increases V/C by > 0.02 and < 0.09	LOS F	Cumulative
LOS F	Project increases V/C by > 0.09	LOS F	Direct

Notes:

LOS = Level of Service;
V/C = Volume-to-Capacity Ratio;
(1) Exception: If Existing + Project segment operation is LOS D and intersections along segment operate at LOS D or better, then there is no significant impact.

Methodology

Scenarios

The LMA focused on automobile delays and LOS. The LOS analysis was conducted to identify Project effects on the roadway operations within the study area and to recommend Project improvements to address any deficiencies. Based on the proposed Project phasing, the following scenarios were evaluated:

- Existing Conditions;
- Year 2027 without Project;
- Year 2027 + Project Phase 1;
- Year 2033 without Project;
- Year 2033 + Project Phases 1 and 2;
- Year 2039 without Project;
- Year 2039 + Project Phases 1, 2 and 3 (TM 994 Buildout);
- Year 2040 without Project;
- Year 2040 + Project Phases 1, 2, 3 and Phase 4 (Specific Plan Buildout).

These years were chosen based on the anticipated years of completion of each phase of development.

Trip Generation

The Project traffic generation calculations were conducted using either the trip generation rates published in the ITE Trip Generation Manual, 11th Edition or SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002. **Table 4.10-6** shows the Project trip generation. A 5% and 10% trip reduction was applied to the Project's trip generation

calculations for Phase 2 and Phase 4, respectively, to account for internal capture due to the mixed-use nature of the development. These reductions are supported by regional guidelines, including the SANDAG *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002* and the *City of San Diego Traffic Impact Study Manual*, both of which recommend a 10% reduction for mixed-use developments. Given the Project's similar characteristics to those referenced in SANDAG and City of San Diego guidelines, the application of a 10% reduction for Phase 4 is reasonable.

A 5% and 10% trip reduction was applied to the Project's trip generation calculations for Phase 2 and Phase 4, respectively, to account for internal capture due to the mixed-use nature of the development. These reductions are supported by regional guidelines, including the SANDAG *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002* and the *City of San Diego Traffic Impact Study Manual*, both of which recommend a 10% reduction for mixed-use developments. Given the Project's similar characteristics to those referenced in SANDAG and City of San Diego guidelines, the application of a 10% reduction for Phase 4 is reasonable. A lower 5% reduction was applied to Phase 2 to reflect its more limited level of mixed-use intensity.

Trip Distribution and Assignment

The Project distribution was based on the site location, access to SR-86 and I-8, existing traffic patterns and anticipated traffic routes to and from the site. The Project traffic distribution assumes 32% of trips oriented to/from the north, 25% of trips oriented to/from the south, 15% of trips oriented to/from the east, and 10% of trips oriented to/from the west using local roadways. Additionally, 12% of trips oriented to/from the west and 6% of trips oriented to/from the east were assumed, using the regional I-8 freeway facility. The Project traffic volumes were assigned differently for Years 2027, 2033, 2039 and 2040 due to the following Project driveways available by each year:

- Phase 1 of the Project is anticipated to be completed by Year 2027. Under Year 2027, Project Driveway D on SR-86 (Intersection 29[(2)]), Project Driveway F (Intersection 31) on Dogwood Road, and Project Driveways G (Intersection 32) and H (Intersection 33) on Correll Road would be provided.
- Phase 2 of the Project is anticipated to be completed by Year 2033. Under Year 2033, Project Driveway A on McCabe Road (Intersection 22), Project Driveways B (Intersection 27) and D (Intersection 29) on SR-86, Project Driveway F (Intersection 31) on Dogwood Road, and Project Driveways G (Intersection 32) and H (Intersection 33) on Correll Road would be provided.

[2] Intersection Numbers are presented on Table 4.10-2.

TABLE 4.10-6. PROJECT TRIP GENERATION

Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
		Rate (a)	Volume	Rate (a) Peak Hour %	In: Out Split (a)	Volume			Rate (a) Peak Hour %	In: Out Split (a)	Volume		
						In	Out	Total			In	Out	Total
Phase 1													
Single-Family	314 DU	9.43/DU (b)	2,961	0.70/DU (b)	26:74	57	163	220	0.94/DU (b)	63:37	186	109	295
Phase 2													
Single-Family	419 DU	9.43/DU (b)	3,951	0.70/DU (b)	26:74	76	217	293	0.94/DU (b)	63:37	248	146	394
Multi-Family	196 DU	6.74/DU (c)	1,321	0.40/DU (c)	24:76	19	59	78	0.51/DU (c)	63:37	63	37	100
McCabe School	600 students	2.27/ student (d)	1,362	0.74/ student (d)	54:46	240	204	444	0.16/ student (d)	46:54	44	52	96
Park/ Detention	29.19 ac	0.78/ac (e)	23	0.02/ac (e)	59:41	1	0	1	0.11/ac (e)	55:45	2	1	3
Mixed-Use Reduction (5%)			-333			-17	-24	-41			-18	-12	-30
Phase 2 Subtotal			***6,324***			***319***	***456***	***775***			***339***	***224***	***563***
Phase 3													
Single-Family	346 DU	9.43/DU (b)	3,263	0.70/DU (b)	26:74	63	179	242	0.94/DU (b)	63:37	205	120	325
Multi-Family	335 DU	6.74/DU (c)	2,258	0.40/DU (c)	24:76	32	102	134	0.51/DU (c)	63:37	108	63	171
Phase 3 Subtotal			***5,521***			***95***	***281***	***376***			***313***	***183***	496
Phase 4 (not part of Tract Map, but within Specific Plan)													
Single-Family	422 DU	9.43/DU (b)	3,979	0.70/DU (b)	26:74	77	218	295	0.94/DU (b)	63:37	250	147	397
Multi-Family	268 DU	6.74/DU (c)	1,806	0.40/DU (c)	24:76	26	81	107	0.51/DU(c)	63:37	86	51	137
Commercial	3.14 ac	1,200/ac (f)	3,768	1,200/ac (f)	60:40	91	60	151	10% (i)	50:50	189	188	377
Business Park	9.41 ac	200/ac (g)	1,882	200/ac (g)	90:10	221	24	245	13% (i)	20:80	49	196	245
Heber Elem School	600 students	2.27/ student (d)	1,362	0.74/ student (d)	54:46	240	204	444	0.16/ student (d)	46:54	44	52	96

TABLE 4.10-6. PROJECT TRIP GENERATION

Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
		Rate (a)	Volume	Rate (a) Peak Hour %	In: Out Split (a)	Volume			Rate (a) Peak Hour %	In: Out Split (a)	Volume		
						In	Out	Total			In	Out	Total
Park/ Detention	26.85 ac	0.78/ac (e)	21	0.02/ac (e)	59:41	1	0	1	0.11/ac(e)	55:45	2	1	3
Mixed-Use Reduction (10%)			-1,282			-66	-59	-125			-62	-64	-126
Phase 4 Subtotal			***11,533***			***590***	***528***	***1,117***			***558***	***571***	***1,129***
TOTAL			***26,342***			***1,061***	***1,428***	***2,489***			***1,396***	***1,087***	***2,483***

Notes: ac = acre DU = Dwelling Unit

(a) = Rates are based on ITE Trip Generation Manual, 11th Edition.
(b) = Rates are based on ITE's single-family detached housing trip rate (Land Use Code 210).
(c) = Rates are based on ITE's multifamily detached housing trip rate (Land Use Code 220).
(d) = Rates are based on ITE's elementary school trip rate (Land Use Code 520).
(e) = Rates are based on ITE's public park trip rate (Land Use Code 411).
(f) = Rates from SANDAG (Neighborhood Shopping Center).
(g) = Rates from SANDAG (Business Park Land Use [Land Use Code 770])
(i) = PM Peak hour rate is % of daily rate.

Source: Linscott, Law & Greenspan, 2025 (Appendix G).

Trip Distribution and Assignment (continued)

- Phase 3 of the Project is anticipated to be completed by Year 2039. Under Year 2039, Project Driveway A on McCabe Road(Intersection 22), Project Driveways B (Intersection 27) and D (Intersection 29) on SR-86, Project Driveways C (Intersection 28) and F (Intersection 31) on Dogwood Road, and P Project Driveways G (Intersection 32) and H (Intersection 33) on Correll Road would be provided.
- Phase 4 of the Project is anticipated to be completed by Year 2040. Under Year 2040, Project Driveway A on McCabe Road (Intersection 22), Project Driveways B (Intersection 27) and D (Intersection 29) on SR-86, Project Driveways C (Intersection 28) and F (Intersection 31) on Dogwood Road, and Project Driveways G and H on Correll Road would be provided. In addition, it is assumed that Driveway E on Dogwood Road would be provided by completion of Phase 4.

As a result, Project traffic at each driveway is anticipated to be redistributed as some vehicles would use driveways better suited for their commute to/from home which may be different than the earlier phases. Traffic distribution conditions for all development phases, including buildout, are presented on Figure 6-1 through Figure 6-8 of the LMA (Appendix G).

4.10.5.2. Intersection and Street Segment Operations By Phase

The scenarios analyzed below assess impacts on the operations of key intersections and street segments within the study area that could result from development of:

- Phase 1;
- Phases 1 and 2;
- Phases 1, 2, and 3 (TM 994 Buildout); and
- Phases 1, 2 3 and Phase 4 (Specific Plan Buildout)

As mentioned in Chapter 3.0, Project Description, the area within Phase-4 is under separate ownership and is not included in proposed TM 994 (i.e., is not owned by McCabe Ranch Realty, LLC). Development within Phase 4 may occur prior to, concurrently with, or subsequent to Tract Map 994 (Phases 1, 2 and 3). For this reason, Phase 4 is it is analyzed at a programmatic level.

Phase 1 Operations (Year 2027)

The following section presents the analysis of study area intersections and street segments under Phase 1.

Peak Hour Intersection Operations

Table 4.10-7 summarizes the Year 2027 peak hour intersection operations, with and without Phase 1 development. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, substantial effects are identified at six (6) intersections, where the Project adds traffic that causes

operations to fall below an acceptable LOS and increases average vehicle delay by more than two (2) seconds (**Table 4.10-7**). These include:

- Aurora Drive / 8th Street – LOS F during the AM and LOS E during the PM peak hour
- W McCabe Road / Austin Road – LOS F during the AM peak hour
- W McCabe Road / La Brucherie Road – LOS F during the AM peak hour
- W McCabe Road / Clark Road – LOS F during the AM peak hour
- Dogwood Road / Black Hills Road / Project Driveway F – LOS E during the AM and LOS F during the PM peak hour
- Heber Road / Dogwood Road *(Caltrans jurisdiction)* – LOS F during the AM and LOS E during the PM peak hour

TABLE 4.10-7: YEAR 2027 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASE 1 DEVELOPMENT

Intersection No. & Name	Control Type	Peak Hour	Year 2027 (Without Project)		Year 2027 + Phase 1		Net Diff.	Substantial Effect?
			Delay	LOS	Delay	LOS		
1. Ross Ave / Imperial Ave	Signal	AM	45.4	D	45.5	D	0.1	No
		PM	31.1	C	31.3	C	0.2	No
2. Ross Ave / 8th St	Signal	AM	26.2	C	26.6	C	0.4	No
		PM	18.9	B	19.1	B	0.2	No
3. Ross Ave / SR-86 (*Caltrans jurisdiction*)	Signal	AM	47.9	D	48.5	D	0.6	No
		PM	39.8	D	40.7	D	0.9	No
4. Ross Ave / Dogwood Rd	Signal	AM	28.3	C	28.8	C	0.5	No
		PM	51.5	D	52.2	D	0.7	No
5. Aurora Dr./ 8th St	AWSC	AM	87.4	**F**	**90.3**	**F**	**2.9**	**Yes**
		PM	40.7	E	42.4	E	1.7	No
6. Aurora Dr./ SR-86 (*Caltrans jurisdiction*)	Signal	AM	26.9	C	27.1	C	0.2	No
		PM	26.6	C	27.1	C	0.5	No
7. Ocotillo Dr./ Imperial Ave	Signal	AM	47.0	D	47.1	D	0.1	No
		PM	29.2	C	29.2	C	0.0	No
8. I-8 WB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	23.7	C	24.5	C	0.8	No
		PM	25.1	C	26.5	C	1.4	No
9. I-8 EB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	24.6	C	25.8	C	1.2	No
		PM	39.0	D	40.5	D	1.5	No
10. I-8 WB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	7.9	A	8.0	A	0.1	No
		PM	7.9	A	8.1	A	0.2	No
11. I-8 EB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	12.0	B	12.0	B	0.0	No
		PM	15.8	B	16.0	B	0.2	No
12. Wake Ave / Imperial Ave	Signal	AM	30.1	C	30.6	C	0.5	No
		PM	23.8	C	24.0	C	0.2	No

TABLE 4.10-7: YEAR 2027 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASE 1 DEVELOPMENT

Intersection No. & Name	Control Type	Peak Hour	Year 2027 (Without Project)		Year 2027 + Phase 1		Net Diff.	Substantial Effect?
			Delay	LOS	Delay	LOS		
13. Wake Ave / SR-86 (*Caltrans jurisdiction*)	Signal	AM	48.3	D	49.8	D	1.5	No
		PM	97.3	**F**	98.9	**F**	1.6	No
14. Danenberg Dr./ Clark Rd	TWSC	AM	9.6	A	9.6	A	0.0	No
		PM	10.2	B	10.3	B	0.1	No
15. Danenberg Dr./ SR-86 *(Caltrans jurisdiction)*	Signal	AM	11.3	B	11.3	B	0.0	No
		PM	19.9	B	20.4	C	0.5	No
16. Danenberg Dr./ Farnsworth Ln	TWSC	AM	10.3	B	10.3	B	0.0	No
		PM	14.4	B	14.4	B	0.0	No
17. Danenberg Dr./ Dogwood Rd	Signal	AM	17.8	B	17.8	B	0.0	No
		PM	23.7	C	23.8	C	0.1	No
18. W McCabe Rd / Austin Rd	AWSC	**AM**	**67.1**	**F**	**73.4**	**F**	**6.3**	**Yes**
		PM	9.6	A	9.8	A	0.2	No
19. W McCabe Rd / La Brucherie Rd	AWSC	**AM**	**91.5**	**F**	**99.8**	**F**	**8.3**	**Yes**
		PM	10.3	B	10.7	B	0.4	No
20. W McCabe Rd / Clark Rd	Signal	**AM**	**60.5**	**F**	**73.6**	**F**	**13.1**	**Yes**
		PM	13.1	B	14.1	B	1.0	No
21. W McCabe Rd / SR-86 *(Caltrans jurisdiction)*	Signal	AM	19.2	B	21.7	C	2.5	No
		PM	20.6	C	24.2	C	3.6	No
22. W McCabe Rd / Farnsworth Ln / Project Dwy A	TWSC	AM	14.8	B	14.8	B	0.0	No
		PM	15.4	C	15.4	C	0.0	No
23. W McCabe Rd / Dogwood Rd	Signal	AM	10.8	B	11.0	B	0.2	No
		PM	15.5	B	16.4	B	0.9	No
24. E McCabe Rd / Dogwood Rd	Signal	AM	8.3	A	8.6	A	0.3	No
		PM	7.6	A	8.1	A	0.5	No
25. E McCabe Rd / Pitzer Rd	Signal	AM	27.9	C	29.5	C	1.6	No
		PM	29.3	C	30.4	C	1.1	No
26. E McCabe Rd / SR-111 *(Caltrans jurisdiction)*	Signal	AM	37.1	D	37.4	D	0.3	No
		PM	35.7	D	36.7	D	1.0	No
27. SR-86 / Project Dwy B *(Caltrans jurisdiction)*	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
28. Dogwood Rd / Project Dwy C	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
29. SR-86 / Project Dwy D *(Caltrans jurisdiction)*	DNE / TWSC	AM	–	–	10.6	B	–	No
		PM	–	–	10.8	B	–	No
30. Dogwood Rd / Project Dwy E	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
31. Dogwood Rd / Black Hills Rd / Project Dwy F	TWSC	AM	25.2	D	40.2	**E**	**15.0**	**Yes**
		PM	34.3	D	52.1	**F**	**17.8**	**Yes**
32. Correll Rd / Project Dwy G	DNE / TWSC	AM	–	–	8.8	A	–	No
		PM	–	–	8.8	A	–	No

TABLE 4.10-7: YEAR 2027 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASE 1 DEVELOPMENT

Intersection No. & Name	Control Type	Peak Hour	Year 2027 (Without Project)		Year 2027 + Phase 1		Net Diff.	Substantial Effect?
			Delay	LOS	Delay	LOS		
33. Correll Rd / Project Dwy H	DNE / TWSC	AM	–	–	8.9	A	–	No
		PM	–	–	8.9	A	–	No
34. Correll Rd / Dogwood Rd	Signal	AM	32.5	C	32.8	C	0.3	No
		PM	24.7	C	25.3	C	0.6	No
35. Heber Rd / Dogwood Rd *(Caltrans jurisdiction)*	AWSC	AM	44.3	**E**	53.8	**F**	**9.5**	**Yes**
		PM	32.5	D	39.4	**E**	**6.9**	**Yes**
36. Heber Rd / Pitzer Rd *(Caltrans jurisdiction)*	TWSC	AM	14.4	B	15.6	C	1.2	No
		PM	15.1	C	16.1	C	1.0	No

Notes:
AWSC = All-Way Stop Controlled intersection.
Delay = Average delay expressed in seconds per vehicle.
DNE = Intersection does not exist during Year 2027
– = Delay and LOS not calculated. LOS = Level of Service.
Net Diff. = increase in delay due to project.
Project Dwy = Project Driveway
Signal = Signalized Intersection
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS "(Yes or No).
TWSC = Two-Way Stop Controlled intersection.

Source: Linscott, Law & Greenspan, 2025 (Appendix G).

Daily Street Segment Operations

Table 4.10-8 summarizes the Year 2027 street segment operations, with and without Phase 1 development. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, a substantial effect is identified at the street segment, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases the Volume to Capacity (V/C) ratio by more than 0.02 (**Table 4.10-8**). The substantially affected street segment is:

- Dogwood Road between McCabe Road and Heber Road - LOS E

TABLE 4.10-8: YEAR 2027 STREET SEGMENT OPERATIONS, WITH AND WITHOUT PHASE 1 DEVELOPMENT

Street Segment	Capacity (LOS E)	Year 2027 (Without Project)			Year 2027 + Project Phase 1			Net Diff.	Substantial Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Imperial Ave									
I-8 to Danenberg Dr	18,000	4,890	A	0.272	5,010	A	0.278	0.012	No
Clark Rd									
Danenberg Dr.to McCabe Rd	18,000	11,570	B	0.643	11,780	B	0.654	0.024	No
SR-86 (Caltrans Jurisdiction)									
Aurora Dr.to I-8	36,000	22,100	B	0.614	22,490	B	0.625	0.023	No
Wake Ave to Danenberg Dr	27,000	13,400	A	0.496	14,140	A	0.524	0.037	No

TABLE 4.10-8: YEAR 2027 STREET SEGMENT OPERATIONS, WITH AND WITHOUT PHASE 1 DEVELOPMENT

Street Segment	Capacity (LOS E)	Year 2027 (Without Project)			Year 2027 + Project Phase 1			Net Diff.	Substantial Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Danenberg Dr.to McCabe Rd	18,000	10,330	A	0.574	11,070	B	0.615	0.052	No
McCabe Rd to Heber Rd	16,200	5,480	C	0.338	6,780	C	0.419	0.087	No
Dogwood Rd									
I-8 to Danenberg Dr	36,000	17,150	A	0.476	17,683	A	0.491	0.024	No
Danenberg Dr.to McCabe Rd	36,000	12,640	A	0.351	13,173	A	0.366	0.022	No
McCabe Rd to Heber Rd	16,200	**14,320**	**E**	**0.884**	**15,238**	**E**	**0.941**	**0.074**	**Yes**
McCabe Rd									
La Brucherie Rd to Clark Rd	16,200	6,740	C	0.416	7,040	C	0.435	0.027	No
Clark Rd to SR-86	16,200	4,490	C	0.277	5,050	C	0.312	0.040	No
SR-86 to Farnsworth Ln	16,200	5,110	C	0.315	5,110	C	0.315	0.006	No
Farnsworth Ln to Dogwood Rd	16,200	5,670	C	0.350	5,670	C	0.350	0.007	No

Notes:
ADT = Average Daily Trips
Source: Linscott, Law & Greenspan,. 2025 (Appendix G)
Capacities based on County of Imperial or City of El Centro Roadway Classification Tables.
LOS = Level of Service.
Net Diff. = increase in delay due to project.
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS " (Yes or No).
V/C = Volume to Capacity Ratio

Phases 1 and 2 Operations (Year 2033)

The following section presents the analysis of study area intersections and street segments under Phases 1 and 2.

Peak Hour Intersection Operations

Table 4.10-9 summarizes the Year 2033 peak hour intersection operations, with and without development of Phase 1 and Phase 2. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, substantial effects are identified at 10 intersections noted below, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases average vehicle delay by more than two (2) seconds (**Table 4.10-9**). Figures 8-3 and 8–4 in Appendix G depict the Year 2029 traffic volumes, with and without the Project.

- Ross Avenue / Dogwood Road – LOS E during the PM peak hour
- Aurora Drive / 8th Street – LOS F during the AM and LOS F during the PM peak hour
- I-8 EB Ramps / SR-86 (Caltrans jurisdiction) – LOS D during the PM peak hour

- Wake Avenue / SR-86 (Caltrans jurisdiction) – LOS E during the AM and LOS F during the PM peak hour
- W McCabe Road / Austin Road – LOS F during the AM peak hour
- W McCabe Road / La Brucherie Road – LOS F during the AM peak hour
- W McCabe Road / Clark Road – LOS F during the AM peak hour
- W. McCabe Road / Farnsworth Ln / Project Drive Way A - LOS F during the AM and LOS F during the PM peak hour
- Dogwood Road / Black Hills Road / Project Driveway F – LOS F during the AM and LOS F during the PM peak hour
- Heber Road / Dogwood Road *(Caltrans jurisdiction)* – LOS F during the AM and LOS F during the PM peak hour

TABLE 4.10-9: YEAR 2033 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASES 1 &2

Intersection No & Name	Control Type	Peak Hour	Year 2033		Year 2033 + Project Phases 1 and 2		Net Diff	Subst. Effect?
			Delay	LOS	Delay	LOS		
1. Ross Ave / Imperial Ave	Signal	AM	46.7	D	47.5	D	0.8	No
		PM	31.6	C	32.3	C	0.7	No
2. Ross Ave / 8th St	Signal	AM	27.3	C	28.9	C	1.6	No
		PM	19.5	B	20.2	C	0.7	No
3. Ross Ave / SR-86 (Caltrans jurisdiction)	Signal	AM	50.5	D	52.3	D	1.8	No
		PM	41.6	D	43.2	D	1.6	No
4. Ross Ave / Dogwood Rd	Signal	AM	29.2	C	34.0	C	4.8	No
		PM	**56.9**	**E**	**69.2**	**E**	**12.3**	**Yes**
5. Aurora Dr./ 8th St	AWSC	AM	**97.2**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
		PM	**46.6**	**E**	**50.8**	**F**	**4.2**	**Yes**
6. Aurora Dr./ SR-86 (*Caltrans jurisdiction*)	Signal	AM	27.6	C	28.7	C	1.1	No
		PM	27.3	C	28.9	C	1.6	No
7. Ocotillo Dr./ Imperial Ave	Signal	AM	50.4	D	51.0	D	0.6	No
		PM	30.7	C	30.9	C	0.2	No
8. I-8 WB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	25.0	C	29.6	C	4.6	No
		PM	26.7	C	31.5	C	4.8	No
9. I-8 EB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	26.2	C	33.7	C	7.5	No
		PM	**41.8**	**D**	**51.9**	**D**	**10.1**	**Yes**
10. I-8 WB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	8.0	A	8.2	A	0.2	No
		PM	8.0	A	8.4	A	0.4	No
11. I-8 EB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	12.1	B	12.3	B	0.2	No
		PM	16.2	B	16.7	B	0.5	No

TABLE 4.10-9: YEAR 2033 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASES 1 &2

Intersection No & Name	Control Type	Peak Hour	Year 2033		Year 2033 + Project Phases 1 and 2		Net Diff	Subst. Effect?
			Delay	LOS	Delay	LOS		
12. Wake Ave / Imperial Ave	Signal	AM	31.1	C	31.5	C	0.4	No
		PM	23.9	C	24.1	C	0.2	No
13. Wake Ave / SR-86 (Caltrans jurisdiction)	Signal	AM	**52.1**	**D**	**57.8**	**E**	**5.7**	**Yes**
		PM	**>100.0**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
14. Danenberg Dr./ Clark Rd	TWSC	AM	9.7	A	9.7	A	0.0	No
		PM	10.3	B	10.4	B	0.1	No
15. Danenberg Dr./ SR-86 *(Caltrans jurisdiction)*	Signal	AM	11.4	B	12.4	B	1.0	No
		PM	20.6	C	23.3	C	2.7	No
16. Danenberg Dr./ Farnsworth Ln	TWSC	AM	10.4	B	12.0	B	1.6	No
		PM	14.7	B	17.7	C	3.0	No
17. Danenberg Dr./ Dogwood Rd	Signal	AM	17.9	B	19.1	B	1.2	No
		PM	24.1	C	25.2	C	1.1	No
18. W McCabe Rd / Austin Rd	AWSC	AM	**75.8**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
		PM	9.7	A	10.4	B	0.7	No
19. W McCabe Rd / La Brucherie Rd	AWSC	AM	**>100.0**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
		PM	10.5	B	11.9	B	1.4	No
20. W McCabe Rd / Clark Rd	Signal	AM	**68.0**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
		PM	13.6	B	17.2	C	3.6	No
21. W McCabe Rd / SR-86 *(Caltrans jurisdiction)*	Signal	AM	19.6	B	30.6	C	11.0	No
		PM	21.2	C	28.6	C	7.4	No
22. W McCabe Rd / Farnsworth Ln / Project Dwy A	TWSC	AM	15.2	C	**>100.0**	**F**	**>2.0**	**Yes**
		PM	15.8	C	**60.5**	**F**	**44.7**	**Yes**
23. W McCabe Rd / Dogwood Rd	Signal	AM	11.0	B	13.6	B	2.6	No
		PM	16.0	B	19.9	B	3.9	No
24. E McCabe Rd / Dogwood Rd	Signal	AM	8.3	A	10.5	B	2.2	No
		PM	7.7	A	9.0	A	1.3	No
25. E McCabe Rd / Pitzer Rd	Signal	AM	28.1	C	33.2	C	5.1	No
		PM	29.5	C	32.5	C	3.0	No
26. E McCabe Rd / SR-111 *(Caltrans jurisdiction)*	Signal	AM	39.0	D	40.4	D	1.4	No
		PM	38.8	D	40.7	D	1.9	No
27. SR-86 / Project Dwy B *(Caltrans jurisdiction)*	DNE / TWSC	AM	–	–	12.0	B	–	No
		PM	–	–	11.6	B	–	No
28. Dogwood Rd / Project Dwy C	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
29. SR-86 / Project Dwy D *(Caltrans jurisdiction)*	DNE / TWSC	AM	–	–	11.9	B	–	–
		PM	–	–	12.0	B	–	–
30. Dogwood Rd / Project Dwy E	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
31. Dogwood Rd / Black Hills Rd / Project Dwy F	TWSC	AM	**27.1**	**D**	**65.8**	**F**	**38.7**	**Yes**
		PM	**37.1**	**E**	**77.4**	**F**	**40.3**	**Yes**
32. Correll Rd / Project Dwy G	DNE / TWSC	AM	–	–	8.8	A	–	No
		PM	–	–	8.8	A	–	No

TABLE 4.10-9: YEAR 2033 INTERSECTION OPERATIONS, WITH AND WITHOUT PHASES 1 &2

Intersection No & Name	Control Type	Peak Hour	Year 2033		Year 2033 + Project Phases 1 and 2		Net Diff	Subst. Effect?
			Delay	LOS	Delay	LOS		
33. Correll Rd / Project Dwy H	DNE / TWSC	AM	–	–	9.1	A	–	No
		PM	–	–	9.0	A	–	No
34. Correll Rd / Dogwood Rd	Signal	AM	33.5	C	34.6	C	1.1	No
		PM	25.0	C	26.6	C	1.6	No
35. Heber Rd / Dogwood Rd *(Caltrans jurisdiction)*	AWSC	AM	**52.3**	**F**	**>100.0**	**F**	**>2.0**	**Yes**
		PM	**37.6**	**E**	**59.9**	**F**	**22.3**	**Yes**
36. Heber Rd / Pitzer Rd *(Caltrans jurisdiction)*	TWSC	AM	14.8	B	24.2	C	9.4	No
		PM	15.3	C	20.9	C	5.6	No

Notes:
AWSC = All-Way Stop Controlled intersection.
Delay = Average delay expressed in seconds per vehicle.
DNE = Intersection does not exist during Year 2033.
– = Delay and LOS not calculated.
LOS = Level of Service.
Net Diff. = increase in delay due to project.
Project Dwy = Project Driveway
Signal = Signalized Intersection
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS "(Yes or No).
TWSC = Two-Way Stop Controlled intersection.

Source: Linscott, Law & Greenspan,. 2025 (Appendix G).

Daily Street Segment Operations

Table 4.10-10 summarizes the Year 2033 street segment operations, with and without Phase 1 and Phase 2 traffic. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, a substantial effect is identified at four (4) street segment, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases the Volume to Capacity (V/C) ratio by more than 0.02 (**Table 4.10-1**). The substantially affected street segments are:

- SR-86 between McCabe Road to Heber Road (*Caltrans jurisdiction*) – LOS D
- Dogwood Road between McCabe Road and Heber Road ‑ LOS E
- McCabe Road between La Brucherie Road and Clark Road – LOS D
- McCabe Road between Farnsworth Ln and Dogwood Road – LOS D

TABLE 4.10-10: YEAR 2033 STREET SEGMENT OPERATIONS, WITH AND WITHOUT + PROJECT PHASES 1 AND 2

Street Segment	Capacity (LOS E)	Year 2033			Year 2033 + Project Phases 1 and 2			Net Diff.	Substan-tial Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Imperial Ave									
I-8 to Danenberg Dr	18,000	5,030	A	0.279	5,400	A	0.300	0.021	No

TABLE 4.10-10: YEAR 2033 STREET SEGMENT OPERATIONS, WITH AND WITHOUT + PROJECT PHASES 1 AND 2

Street Segment	Capacity (LOS E)	Year 2033			Year 2033 + Project Phases 1 and 2			Net Diff.	Substan-tial Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Clark Rd									
Danenberg Dr.to McCabe Rd	18,000	11,920	B	0.662	12,570	C	0.698	0.036	No
SR-86 (Caltrans									
Aurora Dr.to I-8	36,000	22,760	B	0.632	23,970	B	0.666	0.034	No
Wake Ave to Danenberg Dr	27,000	13,810	A	0.511	16,130	A	0.597	0.086	No
Danenberg Dr.to McCabe Rd	18,000	10,650	A	0.592	12,600	C	0.700	0.108	No
McCabe Rd to Heber Rd	16,200	5,640	C	0.348	**7,590**	**D**	**0.469**	**0.120**	**Yes**
Dogwood Rd									
I-8 to Danenberg Dr	36,000	17,670	A	0.491	19,341	A	0.537	0.046	No
Danenberg Dr.to McCabe Rd	36,000	13,020	A	0.362	14,134	A	0.393	0.031	No
McCabe Rd to Heber Rd	16,200	**14,760**	**E**	**0.911**	**15,596**	**E**	**0.963**	**0.052**	**Yes**
McCabe Rd									
La Brucherie Rd to Clark Rd	16,200	6,950	C	0.429	**7,880**	**D**	**0.486**	**0.057**	**Yes**
Clark Rd to SR-86	16,200	4,620	C	0.285	6,380	C	0.394	0.109	No
SR-86 to Farnsworth Ln	16,200	5,270	C	0.325	7,030	C	0.434	0.109	No
Farnsworth Ln to Dogwood Rd	16,200	5,840	C	0.360	**7,330**	**D**	**0.452**	**0.092**	**Yes**

Notes:
ADT = Average Daily Trips
Capacities based on County of Imperial or City of El Centro Roadway Classification Tables.

Source: Linscott, Law & Greenspan,. 2025 (Appendix G).

LOS = Level of Service.
Net Diff. = increase in delay due to project.
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS "(Yes or No).

V/C = Volume to Capacity Ratio

Phases 1, 2 and 3 Operations (Year 2039)

The following section presents the analysis of study area intersections and street segments under Phases 1 and 2 and 3 (TM 994 Buildout). In addition, LLG prepared a traffic study for the Heber Meadows Project, which included a mitigation measure to install a roundabout at the Heber Road / Pitzer Road intersection. This installation is anticipated to be completed before Year 2034.

Therefore, the roundabout was assumed in this scenario and subsequent scenarios. Figures 8–5 and 8-6 in Appendix G shows the Year 2039 traffic volumes with and without the Project.

Peak Hour Intersection Operations

Table 4.10-11 summarizes the Year 2039 peak hour intersection operations, with and without the development of Phases 1, 2 and 3. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, substantial effects are identified at the 13 intersections noted below, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases average vehicle delay by more than two (2) seconds (**Table 4.10-1**). Figures 8-5 and 8–6 in Appendix G depict the Year 2039 traffic volumes, with and without the Phases 1, 2 and 3.

- Ross Avenue / SR-86 (Caltrans jurisdiction) – LOS E during the AM and LOS D during the PM peak hour
- Ross Avenue / Dogwood Road – LOS D during the AM and LOS F during the PM peak hour
- Aurora Drive / 8th Street – LOS F during the AM and PM peak hours
- I-8 EB Ramps / SR-86 (Caltrans jurisdiction) – LOS D during the PM peak hour
- Wake Avenue / SR-86 (Caltrans jurisdiction) – LOS E during the AM and LOS F during the PM peak hours
- W McCabe Road / Austin Road – LOS F during the AM peak hour
- W McCabe Road / La Brucherie Road – LOS F during the AM peak hour
- W McCabe Road / Clark Road – LOS F during the AM peak hour
- W McCabe Road / Farnsworth Lane / Project Driveway A – LOS F during the AM and PM peak hours

TABLE 4.10-11: YEAR 2034 INTERSECTION OPERATIONS WITH AND WITHOUT + PROJECT PHASES 1, 2 AND 3 (TM 994 BUILDOUT)

Intersection	Control Type	Peak Hour	Year 2034		Year 2034 + Project Phases 1, 2 and 3 (Project Buildout)		Net Diff.	Substan-tial Effect?
			Delay	LOS	Delay	LOS		
1. Ross Ave / Imperial Ave	Signal	AM	49.7	D	51.0	D	1.3	No
		PM	32.6	C	33.8	C	1.2	No
2, Ross Ave / 8th St	Signal	AM	29.4	C	33.2	C	3.8	No
		PM	20.6	C	21.8	C	1.2	No
3. Ross Ave / SR-86 *(Caltrans jurisdiction)*	Signal	AM	**56.0**	**E**	**63.1**	**E**	**7.1**	**Yes**
		PM	**45.3**	**D**	**51.4**	**D**	**6.1**	**Yes**

TABLE 4.10-11: YEAR 2034 INTERSECTION OPERATIONS WITH AND WITHOUT + PROJECT PHASES 1, 2 AND 3 (TM 994 BUILDOUT)

Intersection	Control Type	Peak Hour	Year 2034		Year 2034 + Project Phases 1, 2 and 3 (Project Buildout)		Net Diff.	Substan-tial Effect?
			Delay	LOS	Delay	LOS		
4. Ross Ave / Dogwood Rd	Signal	AM	32.0	C	**41.8**	**D**	**9.8**	**Yes**
		PM	**67.3**	**E**	**85.9**	**F**	**18.6**	**Yes**
5. Aurora Dr./ 8th St	AWSC	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	**57.6**	**F**	**69.2**	**F**	**11.6**	**Yes**
6. Aurora Dr./ SR-86 (Caltrans jurisdiction)	Signal	AM	29.2	C	30.9	C	1.7	No
		PM	28.6	C	31.3	C	2.7	No
7. Ocotillo Dr./ Imperial Ave	Signal	AM	57.3	E	58.2	E	0.9	No
		PM	33.8	C	34.3	C	0.5	No
8. I-8 WB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	27.4	C	33.5	C	6.1	No
		PM	30.1	C	34.3	C	4.2	No
9. I-8 EB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	29.5	C	34.5	C	5.2	No
		PM	**48.2**	**D**	**54.4**	**D**	**6.2**	**Yes**
10. I-8 WB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	8.2	A	8.4	A	0.2	No
		PM	8.2	A	8.8	A	0.6	No
11. I-8 EB Ramps / Dogwood Rd *(Caltrans jurisdiction)*	Signal	AM	12.3	B	12.8	B	0.5	No
		PM	17.0	B	18.0	B	1.0	No
12. Wake Ave / Imperial Ave	Signal	AM	33.1	C	33.4	C	0.3	No
		PM	24.0	C	24.4	C	0.4	No
13. Wake Ave / SR-86 *(Caltrans jurisdiction)*	Signal	AM	**59.3**	**E**	**67.9**	**E**	**8.6**	**Yes**
		PM	**>100.**	**F**	**>100. 0**	**F**	**>2.0**	**Yes**
14. Danenberg Dr./ Clark Rd	TWSC	AM	9.8	A	9.8	A	0.0	No
		PM	10.4	B	10.6	B	0.2	No
15. Danenberg Dr./ SR-86 (Caltrans jurisdiction)	Signal	AM	11.6	B	13.3	B	1.7	No
		PM	21.8	C	28.1	C	6.3	No
16. Danenberg Dr./ Farnsworth Ln	TWSC	AM	10.5	B	12.6	B	2.1	No
		PM	15.4	C	20.7	C	5.3	No
17. Danenberg Dr./ Dogwood Rd	Signal	AM	18.2	B	19.6	B	1.4	No
		PM	24.9	C	26.3	C	1.4	No
18. W McCabe Rd / Austin Rd	AWSC	AM	**91.8**	**F**	**>100. 0**	**F**	**>2.0**	**Yes**
		PM	9.9	A	11.3	B	1.4	No
19. W McCabe Rd / La Brucherie Rd	AWSC	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	10.9	B	13.5	B	2.6	No
		AM	**82.8**	**F**	**>100.**	**F**	**>2.0**	**Yes**

TABLE 4.10-11: YEAR 2034 INTERSECTION OPERATIONS WITH AND WITHOUT + PROJECT PHASES 1, 2 AND 3 (TM 994 BUILDOUT)

Intersection	Control Type	Peak Hour	Year 2034		Year 2034 + Project Phases 1, 2 and 3 (Project Buildout)		Net Diff.	Substan-tial Effect?
			Delay	LOS	Delay	LOS		
20. W McCabe Rd / Clark Rd	Signal	PM	14.5	B	23.5	C	9.0	No
21. W McCabe Rd / SR-86 (Caltrans jurisdiction)	Signal	AM	20.5	C	33.9	C	13.4	No
		PM	22.1	C	34.7	C	12.6	No
22. W McCabe Rd / Farnsworth Ln / Project Dwy A	TWSC	AM	16.0	C	**>100.**	**F**	**>2.0**	**Yes**
		PM	16.7	C	**>100.**	**F**	**>2.0**	**Yes**
23. W McCabe Rd / Dogwood Rd	Signal	AM	11.4	B	14.8	B	3.4	No
		PM	17.1	B	25.3	C	8.2	No
24. E McCabe Rd / Dogwood Rd	Signal	AM	8.5	A	12.3	B	3.8	No
		PM	7.8	A	10.3	B	2.5	No
25. E McCabe Rd / Pitzer Rd	Signal	AM	28.3	C	33.5	C	5.2	No
		PM	30.0	C	32.8	C	2.8	No
26. E McCabe Rd / SR-111 (Caltrans jurisdiction)	Signal	AM	42.6	D	43.9	D	1.3	No
		PM	44.0	D	45.8	D	1.8	No
27. SR-86 / Project Dwy B (Caltrans jurisdiction)	DNE / TWSC	AM	–	–	12.4	B	–	No
		PM	–	–	11.7	B	–	No
28. Dogwood Rd / Project Dwy C	DNE / TWSC	AM	–	–	**>100.**	**F**	–	**Yes**
		PM	–	–	**>100.**	**F**	–	**Yes**
29 .SR-86 / Project Dwy D (Caltrans jurisdiction)	DNE / TWSC	AM	–	–	11.7	B	–	No
		PM	–	–	11.6	B	–	No
30. Dogwood Rd / Project Dwy E	DNE	AM	–	–	–	–	–	–
		PM	–	–	–	–	–	–
31. Dogwood Rd / Black Hills Rd / Project Dwy F	TWSC	AM	**31.1**	**D**	**90.3**	**F**	**59.2**	**Yes**
		PM	**43.4**	**E**	**>100.**	**F**	**>2.0**	**Yes**
32. Correll Rd / Project Dwy G	DNE / TWSC	AM	–	–	8.8	A	–	No
		PM	–	–	8.8	A	–	No
33. Correll Rd / Project Dwy H	DNE / TWSC	AM	–	–	9.1	A	–	No
		PM	–	–	9.1	A	–	No
34. Correll Rd / Dogwood Rd	Signal	AM	**36.4**	**D**	**48.3**	**D**	**11.9**	**Yes**
		PM	25.4	C	29.1	C	3.7	No
35. Heber Rd / Dogwood Rd (Caltrans jurisdiction)	AWSC	AM	**67.7**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	**46.3**	**E**	**>100.**	**F**	**>2.0**	**Yes**
36. Heber Rd / Pitzer Rd (Caltrans jurisdiction)	Roundab out	AM	4.7	A	6.2	A	1.5	No
		PM	5.0	A	6.1	A	1.1	No

TABLE 4.10-11: YEAR 2034 INTERSECTION OPERATIONS WITH AND WITHOUT + PROJECT PHASES 1, 2 AND 3 (TM 994 BUILDOUT)

Intersection	Control Type	Peak Hour	Year 2034		Year 2034 + Project Phases 1, 2 and 3 (Project Buildout)		Net Diff.	Substan-tial Effect?
			Delay	LOS	Delay	LOS		

Notes:
AWSC = All-Way Stop Controlled intersection.
Delay = Average delay expressed in seconds per vehicle.
DNE = Intersection does not exist during Year 2039
– = Delay and LOS not calculated.
LOS = Level of Service.
Net Diff. = increase in delay due to project.
Project Dwy = Project Driveway
Signal = Signalized Intersection
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS "(Yes or No).
TWSC = Two-Way Stop Controlled intersection.

Source: Linscott, Law & Greenspan,. 2025 (Appendix G).

- Dogwood Road / Project Driveway C – LOS F during the AM and PM peak hours
- Dogwood Road / Black Hills Road / Project Driveway F – LOS F during the AM and PM peak hours
- Correll Road / Dogwood Road – LOS D during the AM peak hour
- Heber Road / Dogwood Road (Caltrans jurisdiction) – LOS F during the AM and PM peak hours

Daily Street Segment Operations

Table 4.10-12 summarizes the Year 2039 street segment operations, with and without Phase 1, Phase 2 and Phase 3 (TM Buildout) traffic. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, a substantial effect is identified at the six (6) street segments listed below, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases the Volume to Capacity (V/C) ratio by more than 0.02 (**Table 4.10-1**).

- SR-86, between McCabe Road and Heber Road (Caltrans jurisdiction) – LOS D
- Dogwood Road, between McCabe Road and Heber Road – LOS F
- McCabe Road between La Brucherie Road and Clark Road – LOS D
- McCabe Road between Clark Road and SR-86 – LOS D
- McCabe Road between SR-86 and Farnsworth Lane – LOS D
- McCabe Road between Farnsworth Lane and Dogwood Road – LOS

TABLE 4.10-12: YEAR 2039 STREET SEGMENT OPERATIONS, WITH AND WITHOUT PROJECT PHASES 1, 2 AND 3 (TM 994 BUILDOUT)

Street Segment	Capacity (LOS E)	Year 2039 Without Project			Year 2039 + Project Phases 1, 2 and 3 (TM 994 Buildout)			Net Diff.	Sign. Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Imperial Ave									
I-8 to Danenberg Dr	18,000	5,290	A	0.294	5,880	A	0.327	0.033	No
Clark Rd									
Danenberg Dr.to McCabe Rd	18,000	12,530	C	0.696	13,570	C	0.754	0.058	No
SR-86									
Aurora Dr.to I-8	36,000	23,930	B	0.665	25,850	C	0.718	0.053	No
Wake Ave to Danenberg Dr	27,000	14,510	A	0.537	18,210	B	0.674	0.137	No
Danenberg Dr.to McCabe Rd	18,000	11,190	B	0.622	14,300	C	0.794	0.173	No
McCabe Rd to Heber Rd	16,200	5,930	C	0.366	**9,040**	**D**	**0.558**	**0.192**	**Yes**
Dogwood Rd									
I-8 to Danenberg Dr	36,000	18,570	A	0.516	21,235	A	0.590	0.074	No
Danenberg Dr.to McCabe Rd	36,000	13,690	A	0.380	15,763	A	0.438	0.058	No
McCabe Rd to Heber Rd	16,200	**15,510**	**E**	**0.957**	**18,027**	**F**	**1.113**	**0.155**	**Yes**
McCabe Rd									
La Brucherie Rd to Clark Rd	16,200	**7,300**	**D**	**0.451**	**8,780**	**D**	**0.542**	**0.091**	**Yes**
Clark Rd to SR-86	16,200	4,860	C	0.300	**7,670**	**D**	**0.473**	**0.173**	**Yes**
SR-86 to Farnsworth Ln	16,200	5,530	C	0.341	**8,340**	**D**	**0.515**	**0.173**	**Yes**
Farnsworth Ln to Dogwood Rd	16,200	6,140	C	0.379	**7,920**	**D**	**0.489**	**0.110**	**Yes**

Notes:

ADT = Average Daily Trips

Functional Capacities based on County of Imperial or City of El Centro Roadway Classification Tables.

LOS = Level of Service.

Net Diff. = increase in delay due to project.

Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS " (Yes or No).

V/C = Volume to Capacity Ratio

Source: Linscott, Law & Greenspan,. 2025 (Appendix G).

Phases 1, 2, 3 and 4 - Specific Plan Buildout (Year 2040)

The following section presents the analysis of study area intersections and street segments under Phases 1, 2, 3 and 4 (Specific Plan Buildout).

Peak Hour Intersection Operations

Table 4.10-13 summarizes the Year 2040 peak hour intersection operations with and without development of Phases 1, 2, 3 and 4. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, substantial effects are identified at the intersections noted below, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases average vehicle delay by more than two (2) seconds (**Table 4.10-1**). Figures 8–8 and 8-9 in Appendix G show the Year 2040 traffic volumes with and without traffic from Phases 1, 2, 3 and 4.

- Ross Avenue / SR-86 (Caltrans jurisdiction) ‑ LOS F during the AM and LOS E during the PM peak hour
- Ross Avenue / Dogwood Road ‑ LOS E during the AM and LOS F during the PM peak hour
- Aurora Drive / 8th Street ‑ LOS F during the AM and PM peak hours
- I-8 WB Ramps / SR-86 (Caltrans jurisdiction) ‑ LOS E during PM peak hours
- I-8 EB Ramps / SR-86 (Caltrans jurisdiction) ‑ LOS E during the AM peak hour and LOS F during the PM peak hour
- Wake Avenue / SR-86 (Caltrans jurisdiction) ‑ LOS F during the AM and PM peak hours
- Danenberg Drive / Farnsworth Lane ‑ LOS E during the PM peak hour
- W McCabe Road / Austin Road ‑ LOS F during the AM peak hour
- W McCabe Road / La Brucherie Road ‑ LOS F during the AM peak hour
- W McCabe Road / Clark Road ‑ LOS F during the AM and PM peak hours
- W McCabe Road / SR-86 (Caltrans jurisdiction) ‑ LOS F during the AM and PM peak hours
- W McCabe Road / Farnsworth Lane / Project Driveway A ‑ LOS F during the AM and PM peak hours
- Dogwood Road / Project Driveway C ‑ LOS F during the AM and PM peak hours
- Dogwood Road / Project Driveway E ‑ LOS F during the AM and PM peak hours
- Dogwood Road / Black Hills Road / Project Driveway F ‑ LOS F during the AM and PM peak hours
- Correll Road / Dogwood Road ‑ LOS E during the AM and LOS D during the PM peak hour and
- Heber Road / Dogwood Road (Caltrans jurisdiction) ‑ LOS F during the AM and PM peak hours

TABLE 4.10-13: INTERSECTION OPERATIONS YEAR 2040 - WITH AND WITHOUT+ PROJECT BUILDOUT AND PHASE 4

Intersection	Control Type	Peak Hour	Year 2040		Year 2040 + Project Buildout and Phase 4		Net Change	Substantial Effect?
			Delay	LOS	Delay	LOS		
1. Ross Ave / Imperial Ave	Signal	AM	55.2	E	56.2	E	1.0	No
		PM	34.1	C	34.5	C	0.4	No
2. Ross Ave / 8th St	Signal	AM	33.4	C	34.4	C	1.0	No
		PM	22.0	C	24.7	C	2.7	No
3. Ross Ave / SR-86 *(Caltrans jurisdiction)*	Signal	AM	**64.3**	**E**	**83.7**	**F**	**19.4**	**Yes**
		PM	**50.8**	**D**	**69.8**	**E**	**19.0**	**Yes**
4. Ross Ave / Dogwood Rd	Signal	AM	**37.7**	**D**	**62.5**	**E**	**24.8**	**Yes**
		PM	**80.3**	**F**	**>100.**	**F**	**>2.0**	**Yes**
5. Aurora Dr./ 8th St	AWSC	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	**79.0**	**F**	**99.6**	**F**	**20.6**	**Yes**
6. Aurora Dr./ SR-86 (Caltrans jurisdiction)	Signal	AM	31.2	C	34.3	C	3.1	No
		PM	30.6	C	33.9	C	3.3	No
7. Ocotillo Dr./ Imperial Ave	Signal	AM	68.8	E	70.3	E	1.5	No
		PM	38.2	D	39.2	D	1.0	No
8. I-8 WB Ramps / SR-86 *(Caltrans jurisdiction)*	Signal	AM	31.2	C	48.0	D	16.8	No
		PM	**35.8**	**D**	**65.1**	**E**	**29.3**	**Yes**
9. I-8 EB Ramps / SR-86 *(Caltrans Jurisdiction)*	Signal	AM	34.4	C	**73.7**	**E**	**39.3**	**Yes**
		PM	**58.7**	**E**	**>100.**	**F**	**>2.0**	**Yes**
10. I-8 WB Ramps / Dogwood Rd *(Caltrans Jurisdiction)*	Signal	AM	8.4	A	8.8	A	0.4	No
		PM	8.5	A	9.6	A	1.1	No
11. I-8 EB Ramps/ Dogwood Rd *(Caltrans Jurisdiction)*	Signal	AM	12.7	B	13.7	B	1.0	No
		PM	18.2	B	20.7	C	2.5	No
12. Wake Ave / Imperial Ave	Signal	AM	36.5	D	36.7	D	0.2	No
		PM	24.1	C	24.5	C	0.4	No
13. Wake Ave / SR-86 *(Caltrans Jurisdiction)*	Signal	AM	**69.7**	**E**	**87.6**	**F**	**17.9**	**Yes**
		PM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
14. Danenberg Dr./ Clark Rd	TWSC	AM	9.9	A	10.0	A	0.1	No
		PM	10.6	B	10.9	B	0.3	No
15. Danenberg Dr./ SR-86 *(Caltrans Jurisdiction)*	Signal	AM	11.8	B	15.2	B	3.4	No
		PM	23.5	C	33.4	C	9.9	No
16. Danenberg Dr./ Farnsworth Ln	TWSC	AM	10.7	B	16.2	C	5.5	No
		PM	16.3	C	**35.2**	**E**	**18.9**	**Yes**
17. Danenberg Dr./ Dogwood Rd	Signal	AM	18.6	B	21.0	C	2.4	No
		PM	26.1	C	29.4	C	3.3	No

TABLE 4.10-13: INTERSECTION OPERATIONS YEAR 2040 - WITH AND WITHOUT+ PROJECT BUILDOUT AND PHASE 4

Intersection	Control Type	Peak Hour	Year 2040		Year 2040 + Project Buildout and Phase 4		Net Change	Substantial Effect?
			Delay	LOS	Delay	LOS		
18. W McCabe Rd / Austin Rd	AWSC	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	10.1	B	13.4	B	3.3	No
19. W McCabe Rd / La Brucherie Rd	AWSC	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	11.4	B	21.6	C	10.2	No
20. W McCabe Rd / Clark Rd	Signal	AM	**>100.**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	15.7	C	**63.4**	**F**	**47.7**	**Yes**
21. W McCabe Rd / SR-86 *(Caltrans Jurisdiction)*	Signal	AM	21.8	C	**>100.**	**F**	**>2.0**	**Yes**
		PM	23.4	C	**86.4**	**F**	**63.0**	**Yes**
22. W McCabe Rd / Farnsworth Ln / Project Dwy A	TWSC	AM	17.2	C	**>100.**	**F**	**>2.0**	**Yes**
		PM	17.9	C	**>100.**	**F**	**>2.0**	**Yes**
23. W McCabe Rd / Dogwood Rd	Signal	AM	12.0	B	26.2	C	14.2	No
		PM	18.8	B	33.4	C	14.6	No
24. E McCabe Rd / Dogwood Rd	Signal	AM	8.6	A	33.4	C	24.8	No
		PM	8.0	A	15.4	B	7.4	No
25. E McCabe Rd / Pitzer Rd	Signal	AM	28.5	C	34.0	C	5.5	No
		PM	30.5	C	34.7	C	4.2	No
26. E McCabe Rd / SR-111 *(Caltrans Jurisdiction)*	Signal	AM	49.4	D	50.9	D	1.5	No
		PM	54.4	D	54.8	D	0.4	No
27. SR-86 / Project Dwy B *(Caltrans Jurisdiction)*	DNE / TWSC	AM	–	–	17.2	C	–	No
		PM	–	–	16.5	C	–	No
28. Dogwood Rd / Project Dwy C	DNE / TWSC	AM	–	–	**>100.**	**F**	–	**Yes**
		PM	–	–	**>100.**	**F**	–	**Yes**
29 SR-86 / Project Dwy D *(Caltrans Jurisdiction)*	DNE / TWSC	AM	–	–	14.6	B	–	No
		PM	–	–	15.0	B	–	No
30. Dogwood Rd / Project Dwy E	DNE / TWSC	AM	–	–	**>100.**	**F**	–	**Yes**
		PM	–	–	**>100.**	**F**	–	**Yes**
31. Dogwood Rd / Black Hills Rd / Project Dwy F	TWSC	AM	**38.8**	**E**	**>100.**	**F**	**>2.0**	**Yes**
		PM	**55.7**	**F**	**>100.**	**F**	**>2.0**	**Yes**
32. Correll Rd / Project Dwy G	DNE / TWSC	AM	–	–	9.0	A	–	No
		PM	–	–	8.9	A	–	No
33. Correll Rd / Project Dwy H	DNE / TWSC	AM	–	–	9.6	A	–	No
		PM	–	–	9.5	A	–	No
34. Correll Rd / Dogwood Rd	Signal	AM	**42.0**	**D**	**71.3**	**E**	**29.3**	**Yes**
		PM	26.2	C	**36.5**	**D**	**10.3**	**Yes**
35. Heber Rd / Dogwood Rd *(Caltrans Jurisdiction)*	AWSC	AM	**90.3**	**F**	**>100.**	**F**	**>2.0**	**Yes**
		PM	**60.4**	**F**	**>100.**	**F**	**>2.0**	**Yes**

TABLE 4.10-13: INTERSECTION OPERATIONS YEAR 2040 - WITH AND WITHOUT+ PROJECT BUILDOUT AND PHASE 4

Intersection	Control Type	Peak Hour	Year 2040		Year 2040 + Project Buildout and Phase 4		Net Change	Substantial Effect?
			Delay	LOS	Delay	LOS		
36. Heber Rd / Pitzer Rd *(Caltrans Jurisdiction)*	Round about	AM	4.9	A	8.1	A	3.2	No
		PM	5.2	A	7.9	A	2.7	No

Notes:
AWSC = All-Way Stop Controlled intersection.
Delay = Average delay expressed in seconds per vehicle.
DNE = Intersection does not exist during Year 2034
LOS = Level of Service.
Net Diff. = increase in delay due to project.
Project Dwy = Project Driveway
Signal = Signalized Intersection
Substantial Effect ? = Does project cause or contribute to an "unacceptable LOS "(Yes or No).
TWSC = Two-Way Stop Controlled intersection.

Source: Linscott, Law & Greenspan, 2025 (Appendix G).

Daily Street Segment Operations

Table 4.10-14 summarizes the Year 2040 street segment operations, with and without Phases 1, 2, 3 and 4. Based on the established LOS standards and thresholds outlined in **Table 4.10.1**, a substantial effect is identified at nine (9) street segments, where the Project adds traffic that causes operations to fall below an acceptable LOS and increases the volume to capacity (V/C) ratio by more than 0.02 (**Table 4.10-1**). The substantially affected street segments are:

- Clark Road between Danenberg Drive and McCabe Road
- SR-86 between Wake Avenue and Danenberg Drive *(Caltrans jurisdiction)*
- SR-86 between Danenberg Drive and McCabe Road *(Caltrans jurisdiction)*
- SR-86 between McCabe Road and Heber Road *(Caltrans jurisdiction)*
- Dogwood Road between McCabe Road and Heber Road
- McCabe Road between La Brucherie Road and Clark Road
- McCabe Road between Clark Road and SR-86
- McCabe Road between SR-86 and Farnsworth Lane
- McCabe Road between Farnsworth Lane and Dogwood Road

TABLE 4.10-14: YEAR 2040 + PROJECT BUILDOUT AND PHASE 4 STREET SEGMENT OPERATIONS

Street Segment	Capacity (LOS E)	Year 2040 (Without Project)			Year 2040 + Project Phases 1, 2, 3, and 4 (SP Buildout)			Net Diff.	Subst. Effect?
		ADT	LOS	V/C	ADT	LOS	V/C		
Imperial Ave									
I-8 to Danenberg Dr	18,000	5,620	A	0.312	6,670	A	0.371	0.058	No
Clark Rd									
Danenberg Dr.to McCabe Rd	18,000	13,300	C	0.739	15,140	**D**	**0.841**	**0.102**	**Yes**
SR-86 (Caltrans)									
Aurora Dr.to I-8	36,000	25,400	C	0.706	28,820	C	0.801	0.095	No
Wake Ave to Danenberg Dr	27,000	15,410	A	0.571	22,000	**D**	**0.815**	**0.244**	**Yes**
Danenberg Dr.to McCabe Rd	18,000	11,880	B	0.660	17,410	**E**	**0.967**	**0.307**	**Yes**
McCabe Rd to Heber Rd	16,200	6,300	C	0.389	11,830	**E**	**0.730**	**0.341**	**Yes**
Dogwood Rd									
I-8 to Danenberg Dr	36,000	19,710	A	0.548	24,452	B	0.679	0.132	No
Danenberg Dr.to McCabe Rd	36,000	14,530	A	0.404	18,218	A	0.506	0.102	No
McCabe Rd to Heber Rd	16,200	16,460	F	1.016	20,938	**F**	**1.292**	**0.276**	**Yes**
McCabe Rd									
La Brucherie Rd to Clark Rd	16,200	7,750	D	0.478	10,380	**D**	**0.641**	**0.162**	**Yes**
Clark Rd to SR-86	16,200	5,160	C	0.319	10,160	**D**	**0.627**	**0.309**	**Yes**
SR-86 to Farnsworth Ln	16,200	5,870	C	0.362	10,870	**D**	**0.671**	**0.309**	**Yes**
Farnsworth Ln to Dogwood Rd	16,200	6,520	C	0.402	9,680	**D**	**0.598**	**0.195**	**Yes**

Notes:
ADT = Average Daily Trips
Capacities based on County of Imperial or City of El Centro Roadway Classification Tables.
LOS = Level of Service.
Net Diff. = increase in delay due to project.
Subst. Effect? = Substantial Effect (Yes or No)
V/C = Volume to Capacity Ratio

Source: Linscott, Law & Greenspan,. 2025 (Appendix G).

4.10.5.3. Analysis of Project Effects and Significance Determination

Impact 4.10-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Previously Identified Level of Significance

The Certified EIR determined that buildout of the McCabe Ranch II Specific Plan would result in increased traffic volumes during all phases of development. This additional traffic was expected to result in increased delays and deteriorations in levels of service at area intersections and street segments. Buildout of the McCabe Ranch II Specific Plan was found to result in significant direct impacts during each development phase. For each scenario analyzed, improvements were prescribed to improve the level of service to the applicable LOS standard. Mitigation was developed by integrating the improvements into a series of mitigation measures which required the project Master Developer or subsequent builders to provide their fair-share contribution towards specific intersection and street segment improvements to reduce impacts to below a level of significance. Mitigation measures MM 4.14.1a and MM 4.14.2a addressed existing baseline plus Phase I impacts; MM 4.14.1b and MM 14.2b addressed impacts for Phases I, II and III [(3)]; and MM 4.14.1c and MM 4.14.2c addressed impacts for Phases I, II, III and IV.

Impact Analysis

Per the County's thresholds and the analysis methodology presented in Section 4.10.5.1, Project-related traffic is calculated to cause levels of service for intersections and street segments to fall below relevant jurisdiction's minimum LOS standard under all scenarios. A summary of the Project-related substantial effects are provided in **Table 4.10-15**. These impacts are similar to those identified in the Certified EIR.

The Certified EIR included mitigation measures MM 4.14.1a through MM 4.14.1c and MM 4.14.2a and MM 4.14.2b to mitigate project direct and cumulative impacts to below a level of significance. The Local Mobility Analysis prepared by Linscott, Law & Greenspan evaluated impacts associated with development of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment, by phase. Due primarily to the difference in development phasing and the location of the new project driveways, mitigation measures MM 4.14.1a through MM 4.14.1c and MM 4.14.2a and MM 4.14.2b were replaced with mitigation measures MM TR-1.1 through MM TR-1.7; mitigation measures MM TR-2.1 through MM TR-2.7; mitigation measures MM TR-3.1 through MM TR-3.6; and, mitigation measures MM TR-4.1 through MM TR-4.17. These measures include the applicant's construction of roadway and/or intersection improvements, or the applicant's provision of a fair share contributions towards the improvements.

With mitigation, the Project would not conflict with the County of Imperial Circulation and Scenic Highway Element, the City of El Centro's Mobility Element and Caltrans' Complete Street Program in the areas of roadway improvements, LOS, or transit, bicycle and pedestrian facilities. With mitigation, no conflict with an applicable program, plan, ordinance, or policy addressing the circulation system would occur with regard to area intersections or street segments affected by the

[3] The Certified EIR assigned Roman numerals to development phases of the McCabe Ranch II Specific Plan.

Project. Therefore, the proposed Project would not result in new or severely more substantial impacts than those evaluated in the Certified EIR.

TABLE 4.10-15: SUBSTANTIAL EFFECT SUMMARY

Location		Development Scenarios and Substantial Impact Type (Direct or Cumulative)			
		Year 2027 + Project Phase 1	Year 2033 + Project Phases 1 and 2	Year 2039 + Project Phases 1, 2 and 3 (TM 994 Buildout)	Year 2040 + Phases 1, 2, 3 + Phase 4 (Specific Plan Buildout)
No.	**Intersections (a)**				
3	Ross Ave / SR-86 (*)			**Cumulative**	
4	Ross Ave / Dogwood Rd		**Cumulative**		
5	Aurora Dr / 8th Street	**Cumulative**			
8	I-8 WB Ramps / SR-86 (*)				**Cumulative**
9	I-8 EB Ramps / SR-86 (*)		**Cumulative**		
13	Wake Ave / SR-86 (*)		**Cumulative**		
16	Danenberg Dr / Farnsworth Ln				**Cumulative**
18	W McCabe Rd / Austin Rd	**Cumulative**			
19	W McCabe Rd / La Brucherie Rd	**Cumulative**			
20	W McCabe Rd / Clark Rd	**Cumulative**			
21	W McCabe Rd / SR-86 (*)				**Cumulative**
22	W McCabe Rd / Farnsworth Ln / Proj. Dwy. A		**Direct**		
28	Dogwood Rd / Proj. Dwy. C			**Direct**	
30	Dogwood Rd / Proj. Dwy. E				**Cumulative**
31	Dogwood Rd / Black Hills Rd / Proj. Dwy. F	**Cumulative**			
34	Correll Rd / Dogwood Rd			**Cumulative**	
36	Heber Rd / Dogwood Rd (*)	**Cumulative**			
Street Segments					
Clark Rd, between Danenberg Dr and McCabe Rd					**Cumulative**
SR-86, between Wake Ave. and Danenberg Dr (*)					**Cumulative**
SR-86, between Danenberg Dr and McCabe Rd (*)					**Cumulative**
SR-86, between McCabe Rd and Heber Rd (*)			**Direct**		
Dogwood Rd, between McCabe Rd and Heber Rd		**Cumulative**			

TABLE 4.10-15: SUBSTANTIAL EFFECT SUMMARY

Location	Development Scenarios and Substantial Impact Type (Direct or Cumulative)			
	Year 2027 + Project Phase 1	Year 2033 + Project Phases 1 and 2	Year 2039 + Project Phases 1, 2 and 3 (TM 994 Buildout)	Year 2040 + Phases 1, 2, 3 + Phase 4 (Specific Plan Buildout)
McCabe Rd, between La Brucherie Rd and Clark Rd		**Cumulative**		
McCabe Rd, between Clark Rd and SR-86			**Cumulative**	
McCabe Rd, between SR-86 and Farnsworth Lane			**Cumulative**	
McCabe Rd, between Farnsworth Ln & Dogwood Rd		**Direct**		

Note:
(a) = Intersection Locations shown on Figure 4.10-3
(*) = Facility under Caltrans' jurisdiction.
Source: Linscott, Law & Greenspan, 2025 (Appendix G).

Impact 4.10-2: 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)?

Previously Identified Level of Significance

The Certified EIR determined that the McCabe Ranch II Specific Plan would not substantially increase hazards due to a design feature (e.g., sharp curs or dangerous intersections). However, McCabe Road and Dogwood Road both intersect the UPRR which could result in incompatible uses between the railroad and vehicular, bicycle and pedestrians crossing the track. This was considered a potentially significant impact. The Certified EIR concluded that implementation of mitigation measure **MM 4.14.4**, which requires Imperial County Public Works Department, Planning and Development Services Department and the Union Pacific Railroad to jointly assess and determine pedestrian-focused solutions prior to the recordation of the first final map. Implementation of all applicable and feasible safety rules, including horn sounding requirements at all public at-grade highway-rail crossings, marked pedestrian pathways, fencing and slowing devices is also required. The Certified EIR found that implementation of mitigation measure **MM 4.14.4** would reduce potential hazards to below a level of significance.

Impact Analysis

Buildout of the proposed Project would result in construction of a new internal circulation system within the SPA and improvements to off-site roadways and intersections. Both on- and off-site improvements would be designed to be consistent with the standards established in the County of Imperial General Plan Circulation and Scenic Highways Element, the City of El Centro Mobility Element and applicable Caltrans plans and policies. The Project site is located on relatively flat

farmland and, as shown on Figures 3.3A through 3.3F, none of the roadways within the Project area would include sharp curves or result in dangerous intersections.

The proposed Project would be required to submit project plans and specifications to the Imperial County Planning and Development Services Department as well as to the County of Imperial Department of Public Works prior to the construction of each phase. These plans and specifications would undergo departmental review for consistency with applicable City, County and Caltrans standards prior to issuance of applicable grading, building, or occupancy permits, as determined on a project-specific basis by the County.

Buildout of the proposed Project would result in the conversion of farmland to residential, commercial, educational, and recreational uses. Although a number of locations in the Project vicinity have similarly converted farmland to non-farming uses, operating farmland continues to be present in the vicinity of the proposed Project. However, because it is anticipated that the mix of uses in the vicinity of the proposed Project will not include existing incompatible uses, buildout of the proposed Project is not anticipated to substantially increase hazards due to the introduction of new incompatible uses.

The proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curs or dangerous intersections). However, McCabe Road and Dogwood Road would continue to intersect the UPRR which could result in incompatible uses between the railroad and vehicular, bicycle and pedestrians crossing the track. This impacts is similar to that identified in the Certified EIR and mitigation measure **MM 4.14.4** would be applicable to the proposed Project.

Impact 4.10-3: Would the Project result in Inadequate Emergency Access?

Previously Identified Level of Significance

The Certified EIR also determined that the buildout of the McCabe Ranch II Specific Plan would result in the construction of new roadways, intersections and project access driveways that could change emergency access. This impact was considered potentially significant and the Certified EIR identified mitigation measures **MM 4.14.5a and MM 4.14.5b**. These measures required all future developments to be reviewed by the Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies regarding adequate emergency access and to include adequate emergency access locations.

Impact Analysis

Similar to the adopted McCabe Ranch II Specific Plan, the proposed McCabe Ranch II TM 994 and Specific Plan Amendment would also result in the construction of new roadways, intersections and project access driveways that could change emergency access. The layout of the internal circulation is slightly different for the proposed Project, which includes the number and location of access driveways. Nevertheless, impacts to emergency access would be the same as those identified in the

Certified EIR and would be reduced to below a level of significance with implementation of Mitigation Measure MM 4.14.5a and MM 4.14.5b.

4.10.6 Mitigation Measures

4.10.6.1. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

The Certified EIR recommended several measures to reduce traffic impacts to below a level of significance. However, based on the Local Mobility Analysis prepared by Linscott, Law & Greenspan, for the *McCabe Ranch II TM 994 and Specific Plan Amendment,* Mitigation Measures MM 4.14.1a, MM 4.14.4b, MM 4.14.4c; MM 4.14.2a and MM 4.14.2b no longer apply to the Project and have been replaced with new Mitigation Measures MM TR-1, MM TR-2; MM TR-3 and MM TR-4. Mitigation measures MM 14.4, MM 4.14.5a, and MM 4.14.5b, identified in the Certified EIR, remain appliable to the Project. Mitigation measure MM 4.14.6 has been modified to reflect current CEQA standards.

MM 4.14.4 – At-grade Crossing of UPRR at Dogwood Road and McCabe Road

An at-grade crossing shall be constructed where Dogwood Road and McCabe Road cross the Union Pacific Railroad tracks. The Imperial County Public Works Department, Planning and Development Services Department and the Union Pacific Railroad will jointly assess and determine pedestrian-focused solutions. The crossing will implement all applicable and feasible safety rules, including horn sounding requirements at all public at-grade highway-rail crossings, marked pedestrian pathways, fencing and slowing devices.

Timing/Implementation; *Prior to the recordation of the first final map.*

Enforcement/Monitoring: *Imperial County Planning Department and Development Services and Department of Building and Public Works and Union Pacific Railroad.*

MM4.14.5a: Emergency Access Planning

The proposed Project, and all subsequent projects, would be subject to review by the Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies regarding adequate emergency access.

MM 4.14.5b: Emergency Access

The proposed Project and all subsequent projects would incorporate adequate emergency access locations as required by the County Fire Department. Prior to final site plan approval, the County will coordinate with the County Fire Department to ensure adequate circulation and accesses have been incorporated into each project's final site plan.

Timing/Implementation: *Prior to the recordation of the final map.*

Enforcement/Monitoring: *County of Imperial Planning Department and Development Services and Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies.*

MM 4.14.6 Off-Street Parking

Prior to the approval of any subsequent projects within the McCabe Ranch II Specific Plan area, subsequent project-level planning and/or environmental review shall be conducted for each project to ensure the number of off-street parking spaces provided is consistent with the requirements in Imperial County Code of Ordinances Title 9, Division 4, Chapter 2 Off-Street Parking. ~~evaluate the subsequent projects' impact on parking capacity and identify mitigation measures, as appropriate.~~

Timing/Implementation: *Prior to the recordation of the final map.*

Enforcement/Monitoring: *ICPDSD, Imperial County Sheriff's Office, the Imperial County Fire Department, and other applicable agencies*

4.10.6.2. Newly Proposed Mitigation Measures

The Local Mobility Analysis for the McCabe Ranch II TM 994 and Specific Plan Amendment (Appendix G) has identified the following newly proposed mitigation measures to reduce traffic impacts to below a level of significance. The newly proposed mitigation measures are presented herein as MM TR-1 through MM TR-4.

MM TR.1: Project Phase 1 Improvements

INTERSECTIONS

MM TR-1.1: Aurora Drive / 8th Street (Intersection 5)

Contribute a fair share (2.6%) towards signalization of this intersection.

MM TR-1.2: W McCabe Road / Austin Road (Intersection 18)

An unacceptable LOS occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School in which is anticipated to be construct during Phase 2. However, if the Project continues to contribute to the unacceptable LOS once the future McCabe Elementary School construction is complete, then the Project shall contribute a fair share (4.9%) towards signalization of this intersection and restriping the eastbound and widening the westbound approaches to include a dedicated left-turn lane and a shared through/right-turn lane.

MM TR-1.3: W McCabe Road / La Brucherie Road (Intersection 19)

The unacceptable LOS at this intersection during Phase 1 occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School, scheduled to be built on the Project site during Phase 2. However, if the Project continues to contribute to the unacceptable LOS once the McCabe Elementary School is built, then the Project shall contribute a

fair share (5.1%) towards signalization of this intersection, widening the westbound approach to include one westbound right-turn lane, and widening the southbound approach to include one left-turn lane.

MM TR-1.4: W McCabe Road / Clark Road (Intersection 20)

The unacceptable LOS at this intersection during Phase 1 occurs during the AM drop-off time frame for students at the nearby McCabe Union Elementary School. It is anticipated that the majority of students living on the Project site will attend the proposed McCabe Elementary School, scheduled to be built on the Project site during Phase 2. However, if the Project continues to contribute to the unacceptable LOS once the McCabe Elementary School is built, then the Project shall contribute a fair share (6.1%) towards signalization of this intersection and widening the westbound approach to include a dedicated left-turn lane and shared through/right-turn lane.

MM TR-1.5: Dogwood Road / Black Hills Road / Project Driveway F (Intersection 31)

This intersection/project access driveway shall be installed during Phase 1 development and shall be signalized.

MM TR-1.6: Heber Road / Dogwood Road (Intersection 36) ***(Caltrans jurisdiction)***

Contribute a fair share (8.0%) towards signalization of this intersection to ensure the following improvements:

- Northbound: one left-turn lane, two through lanes, and one right-turn lane
- Southbound: one left-turn lane, two through lanes, and one right-turn lane
- Eastbound: one left-turn lane, one through lane, and one right-turn lane
- Westbound: one left-turn lane, one through lane, and one right-turn lane

STREET SEGMENTS

MM TR-1.7: Dogwood Road between McCabe Road and Heber Road

Provide right-of-way to six-lane Prime Arterial standards and construct improvements to four-lane Minor Arterial standards for the portion fronting the Project site. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, contribute a fair share of 13.3% towards four- lane Minor Arterial standards. In addition, the recommended intersection improvement at the Heber Road / Dogwood Road intersections would improve the operations along this street segment.

Timing/Implementation: *Prior to Construction of Phase 1.*

Enforcement/Monitoring: *ICPDSD and Department of Building and Public Works.*

MM TR-2: Project Phase 2 Improvements

INTERSECTIONS

MM TR-2.1: Ross Avenue / Dogwood Road (Intersection 4)

Contribute a fair share (17.6%) towards restriping the eastbound and westbound approaches to include a dedicated left-turn lane. Also install an overlap phase on the eastbound right-turn movement.

MM TR-2.2: I-8 EB Ramps / SR-86 (Intersection 9) (*Caltrans jurisdiction*)

Contribute a fair share (20.1%) towards widening the southbound approach to include one additional southbound left-turn lane.

MM TR-2.3: Wake Ave / SR-86 (Intersection 13) (*Caltrans jurisdiction*)

Contribute a fair share (26.3%) towards widening the southbound approach to include an additional southbound left-turn lane.

MM TR-2.4: W McCabe Road / Farnsworth Lane / Project Driveway A (Intersection 22)

Signalize the intersection and provision of the following improvements:

- Northbound: one left-turn lane, one shared through/right-turn lane
- Southbound: one left-turn lane, one shared through/right-turn lane
- Eastbound: one left-turn lane, one through lane, and one right-turn lane
- Westbound: one left-turn lane, one shared through/right-turn lane

STREET SEGMENTS

MM TR-2.5: SR-86 between McCabe Road and Heber Road (Caltrans jurisdiction)

Provide right-of-way to six-lane Prime Arterial standards and construct improvements to four-lane Minor Arterial standards for the portion fronting the Project site. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards.

MM TR-2.6: McCabe Road between La Brucherie Road and Clark Road

Contribute a fair share of 4.2% towards the construction of improvements for four-lane Minor Arterial standards. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. In addition, the recommended intersection improvements at the W McCabe Road / La Brucherie Road and W McCabe Road / Clark Road intersections (**MM TR-1.3 and MM TR-1.4, respectively**) would also improve the operations along this street segment.

MM TR-2.7: McCabe Road between Farnsworth Lane and Dogwood Road

Provide right-of-way to six-lane Prime Arterial standards and construct improvements for four-lane Minor Arterial standards for the portion fronting the Project site. This configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards. In addition, the recommended intersection improvement at and the W McCabe Road / Farnsworth Lane / Project Driveway A intersection (**MM TR-2.5**) would improve the operations along this street segment.

Timing/Implementation: *Prior to Construction of Phase 2*

Enforcement/Monitoring: *County of Imperial Planning Department and Development Services and Department of Building and Public Works.*

MM TR-3: Project Phase 3 Improvements

INTERSECTIONS

MM TR-3.1: Ross Avenue / SR-86 (Intersection 3) (Caltrans jurisdiction)

Contribute a fair share (24.7%) towards widening the eastbound and westbound approaches to provide dedicated left-turn lanes.

MM TR-3.2: Dogwood Road / Project Driveway C (Intersection 28)

Limit driveway to right-turn in/right-turn out only.

MM TR-3.3: Correll Road / Dogwood Road

Contribute a fair share of 37.2% towards widening the westbound approach to include a dedicated right-turn lane and install an overlap phase on the eastbound and westbound right-turn movements.

STREET SEGMENTS

MM TR-3.5: McCabe Road between Clark Road and SR-86

Contribute a fair share of 11.7% toward the construction of improvements for four- lane Minor Arterial standards. This four-lane configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. The recommendation for a four-lane Minor Arterial was included in the previously approved EIR. In addition, the recommended intersection improvement at the W McCabe Road / Clark Road intersection (**MM TR-1.4**) would also improve the operations along this street segment.

MM TR-3.6: McCabe Road between SR-86 and Farnsworth Lane

Provide right-of-way to six- lane Prime Arterial standards and construct improvements for four-lane Minor Arterial standards for the portion fronting the Project site. This configuration would allow the roadway to operate at acceptable levels given its LOS E capacity of 37,000 vehicles per day. For the off-site portion, construct improvements for four-lane Minor Arterial standards. In addition, the recommended intersection improvement at the W McCabe Road / Farnsworth Lane / Project Driveway A (**MM TR-2.4**) would improve the operations along this street segment.

Timing/Implementation: *Prior to Construction of Phase 3*

Enforcement/Monitoring: *County of Imperial Planning Department and Development Services and Department of Building and Public Works.*

MM TR-4: Phase 4 Improvements

Based on the analysis, the following improvements are recommended to accommodate Phases 1, 2, 3 + Phase 4 (Specific Plan Buildout) traffic volumes. These improvements, once implemented, would improve efficiency of traffic flow and return intersection operations to an acceptable level. As previously noted, the Phase 4 parcels may develop either prior to, concurrent with, or subsequent to the development of the Phases 1, 2 and 3 (TM 994 Buildout). The Phase 4 mitigation measures reflect this potential development sequencing.

INTERSECTIONS

MM TR-4.1: Ross Avenue / SR-86 (Intersection 3) ***(Caltrans jurisdiction)***

The Phase 3 improvement (**MM TR-3.1**) would improve the operations to an acceptable level. MM TR-4.2 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.2: Ross Avenue / Dogwood Road (Intersection 4)

The Phase 2 improvement (**MM TR-2.1**) would improve the operations to an acceptable level. MM TR-4.2 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.3: Aurora Drive / 8th Street (Intersection 5)

The Phase 1 improvement (**MM TR-1.1**) would improve the operations to an acceptable level. MM TR-4.3 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.4: I-8 WB Ramps / SR-86 (Intersection 8) ***(Caltrans jurisdiction)***

Contribute a fair share of 52.7% towards widening the northbound approach to include one additional northbound left-turn lane.

MM TR-4.5: I-8 EB Ramps / SR-86 (Intersection 9) ***(Caltrans jurisdiction)***

The Phase 2 improvement (**MM TR-2.2**) would improve the operations to an acceptable level. MM TR-4.5 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.6: Wake Ave / SR-86 (Intersection 13)*(Caltrans jurisdiction)*

The Phase 2 improvement (**MM TR-2.3**) would improve the operations to an acceptable level. MM TR-4.6 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.7: Danenberg Drive / Farnsworth Lane (Intersection 16)

Install all-way stop-control.

MM TR-4.8: W McCabe Road / Austin Road (Intersection 18)

The Phase 1 improvement (**MM TR-1.4**) would improve the operations to an acceptable level. MM TR-4.8 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.9: W McCabe Road / La Brucherie Road (Intersection 19)

The Phase 1 improvement (**MM TR-1.3**) would improve the operations to an acceptable level. MM TR-4.19 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.10: W McCabe Road / Clark Road (Intersection 20)

The Phase 1 improvement (**MM TR-1.4**) would improve the operations to an acceptable level. MM TR-4.10 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.11: W McCabe Road / SR-86 (Intersection 21) *(Caltrans jurisdiction)*

Contribute a fair share of 86.1% towards provision of the following improvements:

- Northbound: one left-turn lane, one through lane, and one right-turn lane
- Southbound: one left-turn lane, one through lane, and one right-turn lane
- Eastbound: one left-turn lane, one through lane, and one right-turn lane
- Westbound: one left-turn lane, one through lane, and one right-turn lane

MM TR-4.12: W McCabe Road / Farnsworth Lane / Project Driveway A (Intersection 22)

The Phase 2 improvement **(MM TR-2.7**) would improve the operations to an acceptable level. MM TR-4.12 would only be required if Phase 4 is developed prior to the completion of Phase 2. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.13: Dogwood Road / Project Driveway C (Intersection 28)

The Phase 3 improvement (**MM TR-3.2**) would improve the operations to an acceptable level. MM TR-4.13 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.14: Dogwood Road / Project Driveway E (Intersection 30)

Signalize the intersection.

MM TR-4.15: Dogwood Road / Black Hills Road / Project Driveway F (Intersection 31)

The Phase 1 improvement (**MM TR-1.7**) would improve the operations to an acceptable level. MM TR-4.15 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.16: Correll Road / Dogwood Road (Intersection 34)

The Phase 3 improvement (**MM TR-3.2**) would improve the operations to an acceptable level. MM TR-4.16 would only be required if Phase 4 is developed prior to the completion of Phase 3. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

MM TR-4.17: Heber Road / Dogwood Road (Intersection 36) ***(Caltrans jurisdiction)***

The Phase 1 improvement (**MM TR-1.6**) would improve the operations to an acceptable level. MM TR-4.17 would only be required if Phase 4 is developed prior to the completion of Phase 1. In this case the appropriate fair share contribution would need to be calculated, and Phase 4 would be required to assume its share of responsibility.

STREET SEGMENTS

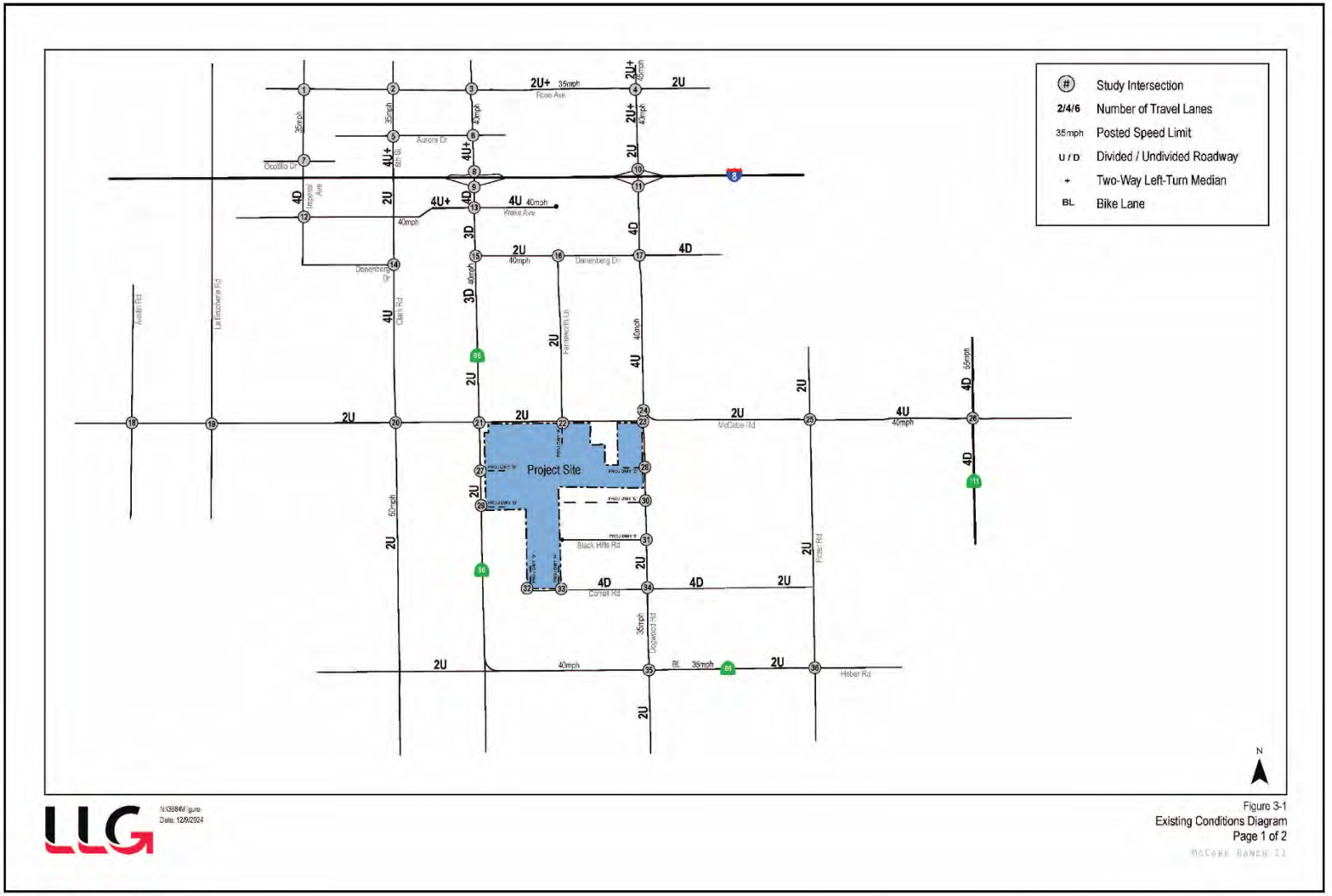
None.

Timing/Implementation: *Prior to Construction of Phase 4.*

Enforcement/Monitoring: *ICPDSD and Department of Building and Public Works.*

4.10.7 Level of Significance After Mitigation

The Project will have less than significant impacts after implementation of mitigation measures MMº4.14.4, MM 4.14-5a and 5b, and MM 4.14.6 identified in the Certified EIR along with MM TR-1.1 through MM TR-4.17 because these measures require the installation of, or payment of fair share contribution towards, intersection and street segment improvements such that the efficiency of traffic flow would be improved and intersection and street segment operations would be maintained at an acceptable level.

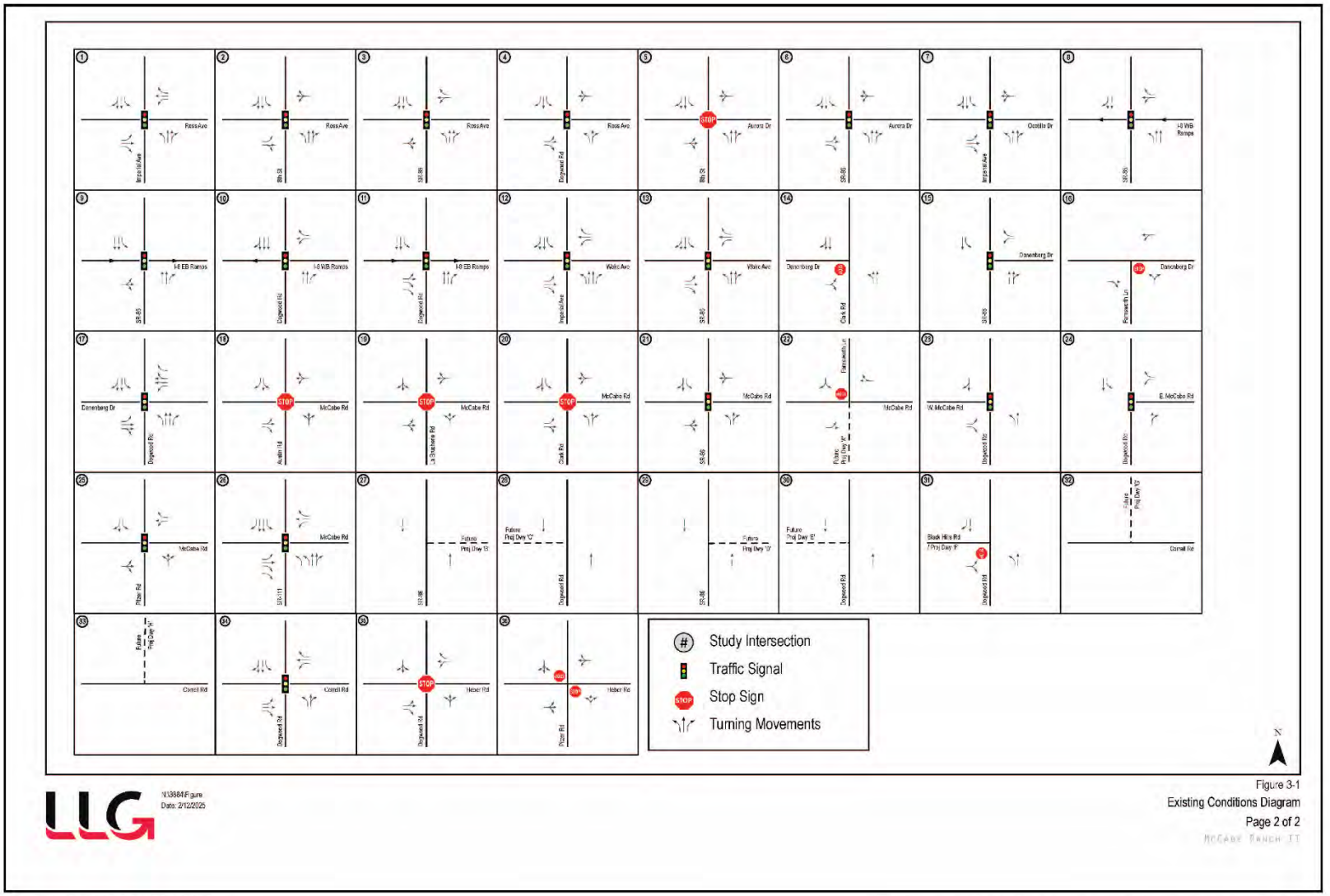


Source: LLG, 2025 (Appendix G)

Existing Conditions Diagram, Page 1 of 2

McCabe Ranch II TM 994 and SPA

Figure 4.10-1

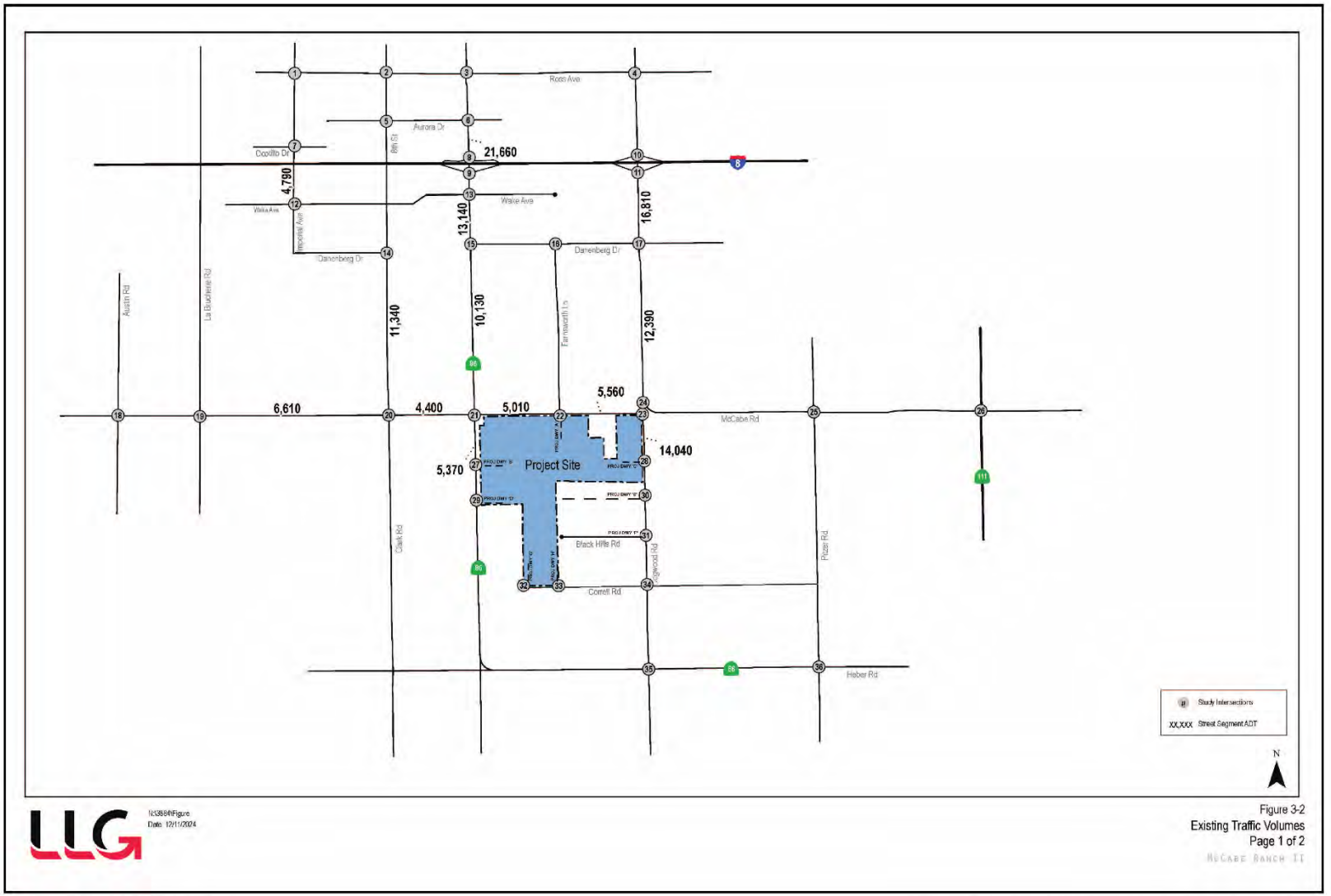


Source: LLG, 2025 (Appendix G)

Existing Conditions Diagram, Page 2 of 2

McCabe Ranch II TM 994 and SPA

Figure 4.10-2

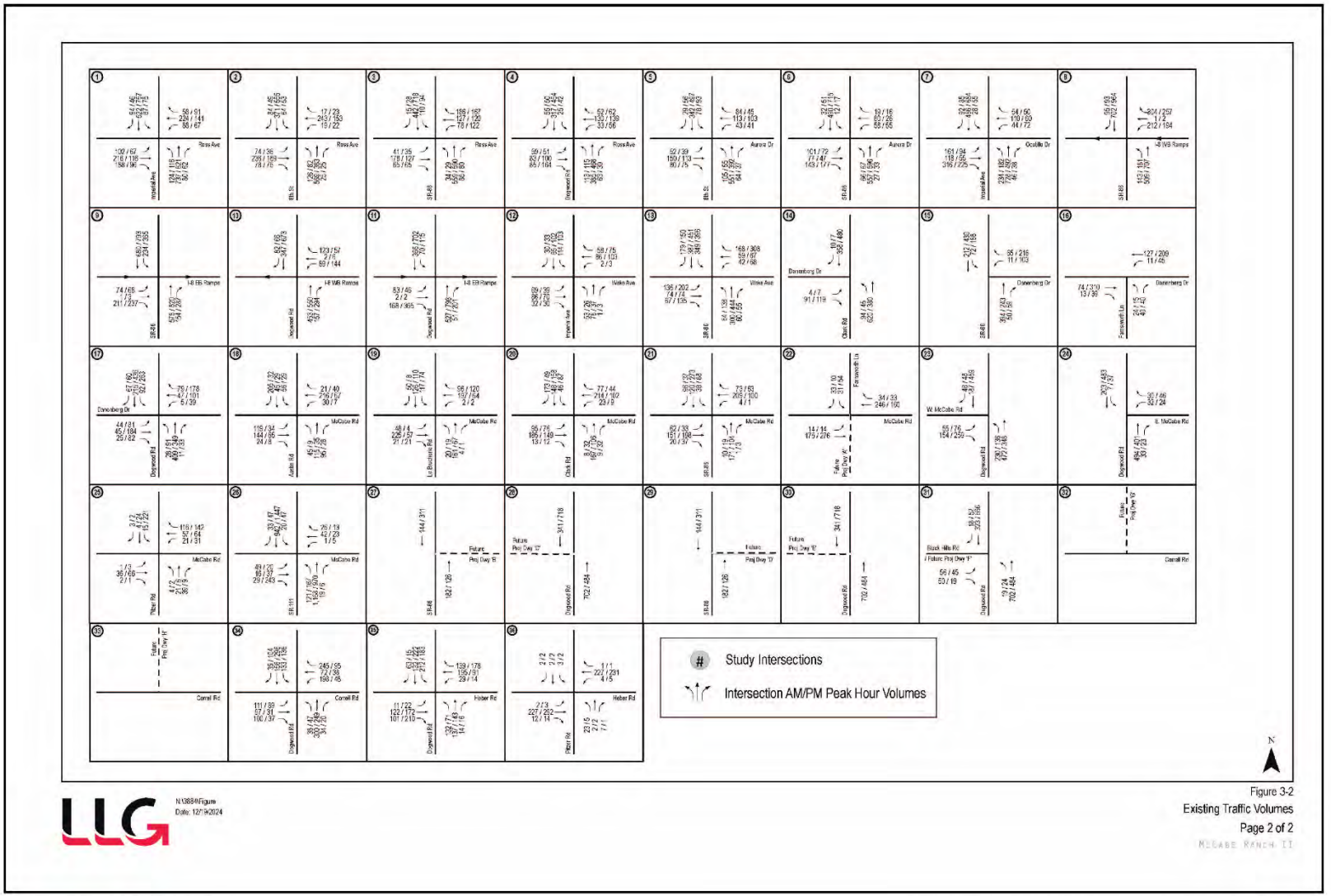


Source: LLG, 2025 (Appendix G)

Existing Traffic Volumes, Page 1 of 2

McCabe Ranch II TM 994 and SPA

Figure 4.10-3



Source: LLG, 2025 (Appendix G)

Existing Traffic Volumes, Page 2 of 2

McCabe Ranch II TM 994 and SPA

Figure 4.10-4

4.11 Tribal Cultural Resources

4.11.1 Introduction

This section provides the supplemental analysis required to assess potential impacts to Tribal Cultural Resources that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment (proposed Project or Project). It also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR.

The following discussion addresses the existing conditions in the Project area, identifies applicable regulations, identifies and analyzes environmental impacts that may result from construction and/or operation of the Proposed Project and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable. The cultural resource technical analysis was included in Appendix D of the Certified EIR.

Scoping Issues Addressed

During the scoping period for the Project, a scoping meeting was conducted, and written comments were received from regulatory agencies and the public. The following issues related to Cultural Resources and Native American Tribal Consultations were raised by the Native American Heritage Commission and are addressed in this section:

- AB 52 applies to any project for which an NOP, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.
- NAHC recommends that lead agencies consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project.
- Both SB 18 and AB 52 have tribal consultation requirements.

4.11.2 Summary of Certified EIR Analysis

Impacts to Undiscovered Prehistoric and Historic Resources

Potential impacts to cultural resources associated with development of the McCabe Ranch II Specific Plan were evaluated in Section 4.5 of the Certified EIR. An archaeological and historical resource investigation were conducted for the McCabe Ranch II Specific Plan in August 2008. These investigations included a records search by the Southeast Information Center at the Imperial Valley College Desert Museum in Ocotillo, a sacred lands search conducted by the Native American Heritage Commission (NAHC), and a pedestrian survey across the entire surface of the ±468.2-acre Specific Plan area. All Native American groups that may have knowledge regarding Tribal Cultural Resources (TCRs) in the Project vicinity were contacted as recommended by the NAHC. The Cocopah Indian Tribe responded to the request, and had no comments regarding the project.

No historical resources or unique archaeological resources were identified within the boundaries of the Specific Plan during the record search or the pedestrian survey. Similarly, no TCRs were identified during consultations with local Native American Tribes. Nevertheless, because of the area's historical occupation by both Native Americans and Spanish peoples, project-related ground-disturbing activities could uncover previously unknown prehistoric resources, historic resources, or human remains within the Specific Plan boundaries. The Certified EIR considered this a potentially significant impact in the that would require mitigation. Mitigation measures MM 4.5.1a and MM 4.5.1b from the Certified EIR were adopted to reduce these impacts to below a level of significance.

4.11.3 Environmental Setting

Prehistory

As noted in Section 4.5.3 of the Certified EIR, the prehistory of the southern California deserts spans at least the last 12,000 years and is usually characterized by four cultural and temporal periods. The prehistory of the southern California deserts and the surrounding areas are discussed in detail by Wallace et al. (1962), Warren (1967), Bettinger and Taylor (1974), and Warren and Crabtree (1986). The work of these researchers is synthesized in the following discussion of regional archaeological cultures and chronologies.

The Paleoindian Period (12,000 – 7,500 BP [Before Present]) represents the first documented Native American occupation of the region. This time period is highlighted by a transition from cool and moist conditions of the Late Pleistocene to the arid and hot conditions of the Early Holocene. There are three distinct cultural complexes associated with this time period: fluted point complexes, the Lake Mojave Complex, and the San Dieguito Complex. Fluted point complexes have been identified both in the southern California deserts and in the surrounding areas. Fluted point complexes, although present in the southern California deserts, are primarily identified from surface contexts. These contexts do not facilitate the recovery of data necessary to fully understand the culture and behaviors of the groups responsible for the manufacture of the points. There is more data, however, for the Lake Mojave and San Dieguito complexes. These two complexes are more common in the area than fluted point complexes and also share several key artifact types. Artifacts usually associated with these two complexes include crescents, scrapers, and large bifaces. The Lake Mojave Complex is centered in the southwestern Great Basin while the San Dieguito Complex extends from coastal California to the Colorado Desert. San Dieguito sites in the Colorado Desert typically include cleared circles, rock rings, other rock features, and heavily varnished crude stone tools.

The Early Archaic Period (7,000 – 4,000 BP) was very hot and dry, and is poorly represented in the Colorado Desert. Although reasons for this are not fully understood, it has been suggested that seasonal river flooding may have affected the numbers of sites dating to this time period. However, neighboring regions provide data regarding the Archaic Period. In these areas the Early Archaic

Period is generally characterized by a diversification of artifact assemblages, including the introduction of groundstone technologies for seed processing. It is likely that these trends also occurred in the Lower Colorado Desert. Pinto, Gypsum, Silver Lake, and possibly concave base projectile points are associated with the Early Archaic Period.

The Middle Archaic Period (4,000 – 1,500 BP) is also poorly represented in the Colorado Desert. Climatic conditions became cooler and moister, and seed collecting and processing characterize economic pursuits during this time period. Artifacts typically associated with the Middle Archaic include manos, metates, handstones, and the bow and arrow which appear in artifact assemblages toward the end of the time period.

The Late Archaic (1,500 – 450 BP) is characterized by Native American populations expanding their territories. During this time period changes in the flow of the Colorado River into Lake Cahuilla expanded it and created a series of freshwater lakes around it. These changes facilitated the development of agriculture and semi-permanent villages along the Lower Colorado River. Simultaneously with the development of agriculture, extensive trade networks were established to connect agricultural settlements in the greater Southwest with the Gulf of California and the Pacific Ocean.

Following the Late Archaic Period, Euroamerican exploration and contact with local Native Americans gradually increased across the region. Euroamerican activity in the area, as in other parts of California, negatively affected Native American populations and culture. Euroamericans introduced new diseases, claimed Native American tribal territories for their uses, and relocated Native American groups to missions or areas beyond their traditional territories. These circumstances disrupted the cultural patterns of Native American groups and contributed to the decline of Native Americans and their cultures.

Ethnography

Kumeyaay inhabit the area currently encompassed by Imperial County and comprise groups formerly identified as Tipai and Ipai (County of Imperial, 2010). Kumeyaay territory extends east nearly to Yuma, Arizona, southwest to Todos Santos Bay, west to the Pacific Ocean, and northwest to the San Luis Rey River and San Felipe Creek. Quechan and Cahuilla border Kumeyaay territory to the east and north, respectively.

Kumeyaay language, formerly called Diegueño, is part of the Hokan stock of the Yuman language family (Langdon, 1990). Kumeyaay were organized into autonomous tribelets under the control of a chief (kwaaypaay) who had at least one assistant (Ladastida and Caldeira, 1995; Luomala, 1978; Shipek, 1991). The position of chief was inherited from father to eldest son. The chief directed ceremonies and resolved differences within the group. Kroeber (1925:712) suggests that Tipai and Ipai populations numbered approximately 3,000 at the time of contact, circa 1770–1790. Subsequent

to contact, the Native American population decreased, and in 1821 Mission San Diego records document a population of 1,711, which would have included Kumeyaay (Luomala, 1978).

Kumeyaay relied heavily on seasonally available vegetal foods on valley floors and in the foothills and mountains (Ladastida and Caldeira, 1995). In the spring, blossoms and buds were collected from blooming plants in the foothills. During the summer, cactus fruits, agave, and mesquite pods were collected in valleys. Small animals were hunted during both seasons. During the fall and winter months, Kumeyaay moved into the mountains seeking shelter and food. Rockshelters and overhangs provided shelter from winter rain and snow, and acorns, pinyon nuts, and small game provided food.

Kumeyaay material culture includes seed processing implements such as the mortar and pestle and milling stones; baskets which were used for seed winnowing and storage; plain and decorated reddish-brown ceramic vessels which were used for both cooking and storing water; and the bow and arrow (Ladastida and Caldeira, 1995). Structures built by the Kumeyaay varied in form depending on the season. For example, summer residential structures often consisted only of a windbreak while winter residential structures were semi-subterranean pit houses with a with-tie pole framework and brush thatch. Kumeyaay also built ceremonial structures, such as rock-supported brush fence circles, for events such as harvest dances (Luomala, 1978; Shipek, 1991).

Kumeyaay primarily interacted and traded among themselves, but did involve neighboring groups in certain trading activities. For example, coastal groups traded salt, dried seafood, and abalone shells with interior valley groups for gourds, acorns, agave, and mesquite pods. Kumeyaay also traded for granite to manufacture mortar and pestles, and Quechans traded with the Kumeyaay for acorns and acorn flour (Luomala, 1978; Shipek, 1991).

History

Spanish exploration of Southern California dates to the 1500s. Hernando de Alarcon discovered Alta California while sailing up the Colorado River in 1540 and was the first European to encounter the Quechan Indians (Hoover et al., 1990). The impact of 16th century exploration on the Native peoples in the area, however, appears to have been relatively minimal. Spanish exploration of the area continued into the 18th century and in 1775, Juan Batista de Anza volunteered to find an overland trail to connect Spanish settlements in Sonora, Mexico, with new missions on the California Coast (Beck and Haase, 1974; Hoover et al., 1990). The trail opened by Anza was also used by later explorers, trappers, and argonauts. Subsequent to Anza's explorations, the Spanish attempted to establish missions in the area but were generally unsuccessful. Two missions were built in 1780 but were destroyed a year later by hostile Yuma Indians dissatisfied with their treatment by the Spanish.

The Anza Trail across what is now Imperial County later became known as the Sonora Road, the Colorado Road, the Emigrant Trail, and the Butterfield Stage Route (Hoover et al., 1990). The Sonora Road/Emigrant Trail was used from 1825 to 1865 for cattle drives from New Mexico and

Texas to ranches in the Coastal Range (County of Imperial, 1993). The Butterfield Stage also used this route until completion of the railroad across the region in 1878.

Euroamerican contact with Native Americans increased across the area of the southern California deserts in 1848 and 1849 as gold miners passed through the area along the Emigrant Trail. Construction of Yuma Crossing and the military fortification of Fort Yuma in 1852 were due to numerous hostile confrontations between Euroamericans and Native Americans in the area. Imperial Valley, however, did not attract many settlers until its agricultural potential was developed in the early 1900s. Irrigation of the valley was first suggested by Oliver Wozencraft, and eventually accomplished by Charles R. Rockwood and George Chaffey in 1901 (Hoover et al., 1990). The introduction of irrigation in Imperial Valley spawned the development of both large- and small-scale agriculture and the establishment of many small towns. The area grew rapidly, and by 1907 nearly 15,000 people lived in Imperial Valley. Southern Pacific Railroad also built a branch line in the area in 1903 to handle the increased commercial export of agricultural products. At this time Imperial Valley was officially incorporated as a jurisdiction separate from San Diego County.

Between 1905 and 1907 Imperial Valley was accidentally flooded due to a faulty canal gate. As a result, the Salton Basin was inundated and the Salton Sea was created. Subsequently, major improvements were made to the irrigation system to prevent future flooding. The Imperial Irrigation District (IID) took control of the irrigation system in 1916, and by 1941 a more reliable and consistent water supply was assured for the area with the completion of the All-American Canal. Although agriculture still continues to be the predominant activity in Imperial Valley, other major industries are now becoming part of a wider economic base such as geothermal energy development, mining, customs brokers, tourism, and the provision of essential regional and national facilities such as correctional institutions and military training facilities.

Known Cultural Resources in the Project Area

PMC conducted archaeological and historical investigations for the McCabe Ranch II Specific Plan in 2008 These investigations included a record search conducted by the Southeast Information Center at the Imperial Valley College Desert Museum, Ocotillo; a pedestrian surface survey of the entire Specific Plan area; and completion of a report that documented the results of archaeological and historical investigations. PMC did not identify any historical resources, unique archaeological resources, or any other significant cultural resources (e.g., prehistoric sites, historic sites, historic buildings, or isolated artifacts) within project boundaries.

Four cultural resources have been reported within 1 mile of the project area (P-13-008682, P-13-008987, P-13-009306, P-13-009307). All four of these resources are historic constructions including two houses, the Dogwood canal, and the Niland-Calexico Railroad. In addition, a historic farm complex, including a residence, silo, and outbuildings, is located along the northwest boundary of the project area (on the corner of McCabe Road and State Route 86). All structures are finished with board and batten siding and have gabled roofs consisting of wood shakes. According to the

Imperial County Assessor's Office, the complex was built in 1953. This site may be eligible for inclusion in the National Register of Historic Places or the California Register of Historic Resources; but would not be affected by the proposed project.

4.11.4 Regulatory Setting

4.11.4.1 State

Assembly Bill 52

California Assembly Bill 52 of 2014 (AB 52) was enacted on July 1, 2015, and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources:

1. "Sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" and meets either of the following criteria: 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
2. A cultural 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.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18 (SB 18)

SB 18 of 2004 (California Government Code §65352.3) requires local governments to contact, refer plans to and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American

tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Native American Historic Resource Protection Act

Public Resources Code Sections 5097 et seq. codify the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

> *"No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres."*

California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those remains. California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or any nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

4.11.4.2 Local

County of Imperial General Plan

The County of Imperial General Plan (General Plan) provides goals, objectives, and policies for the identification and protection of significant cultural resources. Specifically, the Conservation and Open Space Element of the General Plan calls for the protection of cultural resources and scientific sites and contains requirements for cultural resources that involve the identification and documentation of significant historic and prehistoric resources and the preservation of representative and worthy examples. The Conservation and Open Space Element also recognizes the value of historic and prehistoric resources and the need to assess current and proposed land uses for impacts upon these resources.

Relevant County of Imperial General Plan policies related to historic and prehistoric resources are provided below. **Table 4.11-1** summarizes the project's consistency with the County's General Plan policies. While this SEIR analyzes the project's consistency with the General Plan pursuant to State

CEQA Guidelines Section 15125(d), the Imperial County Planning Commissioners and Board of Supervisors ultimately determine consistency with the General Plan.

TABLE 4.11-1: CONSISTENCY WITH APPLICABLE GENERAL PLAN TRIBAL CULTURAL RESOURCES GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element (COSE)		
COSE Goal 1: Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value. • **COSE Objective 1.2:** Coordinate the acquisition, designation, and management of important natural and cultural resource areas in Imperial County with other governmental agencies as appropriate. • **COSE Objective 1.3:** Develop standards to protect significant natural and cultural resource areas for the purpose of enhancing both the planning and decision-making process. • **COSE Objective 1.4:** Ensure the conservation and management of the County's natural and cultural resources. • **COSE Objective 1.6:** Promote the conservation of ecological sites and preservation of cultural resource sites through scientific investigation and public education.	Yes, with mitigation	A cultural resource investigation was conducted for the McCabe Ranch II Specific Plan in 2008 as part of the Previous Final EIR. The Project is in compliance with this goal and objective through incorporation of mitigation measures **MM CUL-1** through **MM CUL-6.**
COSE Goal 3: Preserve the spiritual and cultural heritage of the diverse communities of Imperial County. • **COSE Objective 3.1:** Protect and preserve sites of archaeological, ecological, historical, and scientific value, and/or cultural significance.	Yes, with mitigation	A cultural resource investigation was conducted for the McCabe Ranch II Specific Plan in 2008 as part of the Previous Final EIR. The Project is in compliance with this goal and objective through incorporation of mitigation measures **MM CUL-1** through **MM CUL-6.**
• **COSE Objective 3.3:** Engage all local Native American Tribes in the protection of tribal cultural resources, including prehistoric trails and burial sites.	Yes	Pursuant to Assembly Bill 52 and Senate Bill 18, a total of 19 letters were distributed to local Native American tribes and their representatives notifying them of an opportunity to consult with the County on the McCabe Ranch II TM 994 and Specific Plan Amendment. Copies of the notification letters and responses are included in Appendix H-1 and H-2 of the Draft SEIR, respectively.

TABLE 4.11-1: CONSISTENCY WITH APPLICABLE GENERAL PLAN TRIBAL CULTURAL RESOURCES GOALS AND POLICIES

General Plan Policies	Consistency	Analysis

Source: County of Imperial, 2016.

While this Draft SEIR analyzes the Project's consistency with the County of Imperial General Plan pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15125(d), the Imperial County Planning Commission and Board of Supervisors ultimately determines consistency with the General Plan.

4.11.5 Thresholds of Significance

Based on CEQA Guidelines Appendix G, a project's impacts related to tribal cultural resources would be considered to have a significant impact if the project causes a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.11.6 Analysis of Project Impacts and Significance Determination

Impact Analysis

Impact 4.11-1: Would the Project cause a substantial adverse change in the significance of a Tribal Cultural Resource?

Pursuant to Public Resources Code (PRC) Section 21080.3.1, upon determining that a Supplemental EIR would be prepared for the proposed Project, the County initiated a plan to conduct consultation with California Native American Tribes traditionally and culturally affiliated with the project area. On June 26, 2024, the County sent notification letters to two (2) California Native American Tribes and/or their representatives initiating the 30-day period required by AB 52. Similarly, on June 26, 2024, the County sent notification letters to seventeen (17) federally-recognized California Native American Tribes and/or their representatives initiating a 45-day period required under SB 18. Copies

of the AB 52 and SB 18 notification letters and responses are provided in Appendix H-1 and H-2, respectively.

As of the date of publication of the Draft SEIR, no responses have been received. However, based on knowledge of areas used by their ancestors and the stated potential to encounter archaeological resources during project construction, this impact could be potentially significant.

Construction monitoring required under MM CUL-1 includes a Qualified Archaeologist who meets or exceeds the Secretary of the Interior Professional Qualifications Standards as an archaeologist and a TCA (traditionally and culturally affiliated) Native American Monitor. With implementation of mitigation measures MM 4.5.1a, MM 4.5.1b, MM CR-1 and MM CR-2, the Project's impact on tribal cultural resources would be less than significant.

Impact 4.11-2: Would the Project result in a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe determined to be significant the County of Imperial?

Based on coordination to date, Native American representatives have not provided information indicating there are resources that are significant to a California Native American tribe or otherwise qualify as Tribal Cultural Resources, as defined in Public Resources Code Section 5024.1. Nevertheless, the Project has the potential to result in impacts to undiscovered buried cultural resources and/or subsurface deposits. Therefore, there is the potential for inadvertent discovery of a resource that could be impacted by project implementation. Impacts would be considered potentially significant. With implementation of mitigation measures MM 4.5.1a, MM 4.5.1b, MM CR-1 and MM CR-2, potential impacts to buried cultural resources and/or subsurface deposits would be less than significant.

4.11.7 Mitigation Measures

4.11.7.1 Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Mitigation measures MM 4.5.1a and MM 4.5.1b were identified in the Certified EIR for the McCabe Ranch II Specific Plan. These measures have been replaced by mitigation measures MM CUL-1 through MM CUL-6 which would be implemented to reduce significant impacts to tribal cultural resources.

~~**MM 4.5.1a Prehistoric or Historic Resources**~~

~~During all excavation or other earth-moving activities within the McCabe Ranch II Specific Plan area, the project applicant shall notify the Imperial County Planning and Development Services Department immediately if any prehistoric or historic resources are uncovered. All construction must stop in vicinity of the find and an archaeologist that meets the Secretary of the Interior's~~

~~Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to evaluate the finds and recommend appropriate action.~~

~~Imperial County and the project applicant shall consider mitigation recommendations presented by a professional archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology for any unanticipated discoveries. Imperial County and the project applicant shall consult and agree upon implementation of a measure or measures that Imperial County and the project applicant deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The project proponent shall be required to implement any mitigation necessary for the protection of cultural resources.~~

~~*Timing/Implementation: As a condition of project approval, and implemented during ground disturbing construction activities.*~~

~~*Enforcement/Monitoring: Imperial County Planning and Development Services Department.*~~

~~**MM 4.5.1b Human Remains**~~

~~During all excavation or other earth-moving activities within the McCabe Ranch II Specific Plan area, should human remains be discovered, all work must stop in the immediate vicinity of the find, the Imperial County Planning and Development Services Department shall be notified immediately, and the County Coroner must be notified according to Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.~~

~~*Timing/Implementation: As a condition of project approval, and implemented during ground disturbing construction activities.*~~

~~*Enforcement/Monitoring: Imperial County Planning and Development Services Department*~~

4.11.7.2 Newly Proposed Mitigation Measures

MM CUL-1 through MM CUL-6 require proper notification and mitigation for historic and prehistoric resources discovered during future project development within the Specific Plan area and reduce the potential effects to a minimum.

MM-CUL-1: Prepare and Implement a Cultural Resource Mitigation and Monitoring Plan.

- Prior to issuance of a grading permit for any future development phase, development activity or infrastructure improvement that would occur under TM 994 or the Specific Plan, the

Project Applicant shall retain a qualified archaeologist1 to prepare a Cultural Resource Mitigation and Monitoring Plan (CRMMP), which shall be submitted to and approved by the Imperial County Planning and Development Services Department (ICPDSD). The purpose of the CRMMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b), and to lay out a detailed program of mitigation for direct and indirect impacts on cultural resources during project implementation. The mitigation and monitoring plan shall identify procedures for monitoring and the implementation of a discovery plan in coordination with affected Tribal groups and include the following at a minimum:

- List of personnel involved in the monitoring activities;
- Inclusion of involvement of the Native American community, as appropriate;
- Description of the worker awareness program that shall be implemented;
- Description of how the monitoring shall occur;
- Description of frequency of monitoring (e.g., full-time, part time, spot checking);
- Description of resources expected to be encountered (if any);
- Description of circumstances that would result in the halting of work at the project site.

- Description of procedures for halting work on the site and notification procedures including the notification of the Applicant, the ICPDSD, and tribal representatives within 24 hours of the inadvertent discovery of archaeological resources; and
- Description of monitoring reporting procedures.

The project's grading and construction plans and specifications shall state that full-time monitoring by a qualified archaeologist shall be conducted during the initial grubbing and ground disturbance for the Project. In the event that archaeological resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

Timing/Implementation: *Prior to grading permit issuance, ~~d~~during grading and excavation activities, and upon completion of monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

[1] Meeting the Secretary of the Interior's Professional Standards published in Appendix A of 36 CFR Part 61.

MM-CUL-2: Cultural Resources Construction Monitor.

The Applicant for all future development activities shall retain qualified archaeological monitors and a traditionally and culturally affiliated (TCA) Native American Monitor for all ground-disturbing activities associated with the Project. Native American tribes shall be given the opportunity to provide one or more certified cultural monitors for the Project during all excavation or earth-moving within the Project site in Holocene-aged deposits. The Construction Contractor shall give the tribe's Historic Preservation Officer (THPO) or other designated representative two weeks' advanced notice of the monitoring opportunity and shall provide a copy of such notice to the County.

If a significant cultural resource site is found during ground-disturbing activities the resource will be protected in place, or data recovery will be initiated, consistent with the mitigation and monitoring plan required by **MM-CUL-1**.

Timing/Implementation: *Prior to grading permit issuance, ~~d~~during grading and excavation activities, and upon completion of monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

MM CUL-3: Human Remains.

Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, California Public Resources Code §5097.98, and California Code of Regulations (CCR) §15064.5(e). Should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Timing/Implementation: *During grading and excavation act~~i~~vities, and upon completion of monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

MM CUL-4: Disposition of Tribal Cultural Resources.

The landowner shall relinquish ownership to the TCA tribe all tribal cultural resources collected during the cultural resource mitigation monitoring conducted for all future development activities for respectful and dignified treatment and disposition, including reburial, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

Timing/Implementation: *Prior to grading permit issuance, during grading and excavation activities, and upon completion of monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

MM CUL-5: Unanticipated Discoveries Historic Properties Treatment Plan/ Data Recovery Plan

Should an unanticipated discovery be made, avoidance is the preferred treatment (CEQA Guidelines, Section 15126.4(b)(3)(A)), but if the site cannot be avoided in place, then the site will be further evaluated. Immediately upon discovery of a find, a qualified archaeologist will evaluate the significance of the newly discovered site or unanticipated discovery along with attempted consultation with designated Native American representatives in order to provide proper management recommendations.

If testing and evaluation of the site is recommended, the qualified archaeologist shall prepare a research design, schedule, and budget for review and approval by the County and the Applicant. During evaluation and testing, the appropriate Native American tribe shall be notified in advance so that a tribal monitor can be present and assist with the work being conducted. At the completion of the monitoring program, the qualified archaeologist shall prepare a monitoring report that describes the project, the personnel used, the dates of performance, and results. If cultural resources are recovered and cannot be preserved in place, they shall be cleaned, catalogued, analyzed, reburied in a nearby area after consultation or curated at the California Historical Resources Regional Information Center.

Timing/Implementation: *During grading and excavation activities, and upon completion of monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

MM CUL-6: Prepare Final Monitoring Report and/or Evaluation Report.

Prior to the release of the grading bond for all future development activities and no later than 90 days after monitoring has been completed, a Final Monitoring Report and/or Evaluation Report

(Final Report) shall be completed. This report shall describe the results, analysis and conclusions of the cultural resource mitigation monitoring efforts such as, but not limited to, the Research Design and Data Recovery Program. It will also include a list of project personnel, a catalog of any cultural resources that were identified, any associated DPR 523 Forms and/or confidential maps, details of the location of the final disposition of cultural resources (if any), any issues or problems that occurred during monitoring, and any other pertinent information. The Final Report shall be submitted by the project archaeologist, along with the notes and comments from the TCA Native American Monitor(s), to the Imperial County Planning and Development Series Dept. (ICPDSD) for review and approval. Upon approval by the ICPDSD, a complete Final Report shall be submitted to the appropriate Information Center, and TCA Tribes, any relevant curation facility, and the landowner/applicant.

Timing/Implementation: *Upon completion of all monitoring activities.*

Enforcement/Monitoring: *ICPDSD.*

4.11.8 Level of Significance After Mitigation

Mitigation Measures CR-1 and CR-2 would reduce potentially significant impacts associated with unknown buried tribal cultural resources to a *less-than-significant* level.

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4.12 Utilities and Service Systems

4.12.1 Introduction

This section provides the supplemental analysis required to assess potential utility and service system impacts that would result from implementation of the proposed McCabe Ranch II TM 994 and Specific Plan Amendment (proposed Project or Project). It also compares impacts from the proposed Project to the impacts that would result from implementation of the adopted McCabe Ranch II Specific Plan (2010) identified in the Certified EIR. This section also identifies specific and detailed measures from the Certified EIR that apply to the Project; or modified/new mitigation measures to avoid, minimize, or compensate for potentially significant adverse impacts.

Information used in preparing this section and in the evaluation of potential utility and service system impacts was derived from the *Final Environmental Impact Report for the McCabe Ranch II Specific Plan* (State Clearinghouse No. SCH No. 2008111037) (Imperial County, 2010). Information was also derived from the *McCabe Ranch II TM 994 Water Supply Assessment* (Appendix F) prepared by Dubose Design Group, which is included as Appendix F of this SEIR.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from agencies and members of the public. The following provides a concise summary of issues raised by the Imperial Irrigation District (IID). A detailed listing is Distribution-rated electrical service is limited in the area. A circuit study may be required. Any improvements or mitigation needed to enable the provision of electrical service shall be the financial responsibility of the applicant.

- Applicant shall provide a surveyed legal description and associated exhibit for all rights-of-way (ROWs) deemed as necessary by IID to accommodate the project's electrical infrastructure.
- IID water facilities that may be impacted include the Dogwood Canal, Dogwood Lateral 2, Date Drain No. 3, and Date Drain No. 3A. The applicant may not use IID's canal or drain banks to access the project site.
- The proposed tentative map indicates that the Date Drain No. 3 and the Dogwood Lateral 2 are to be placed underground/pipelined from McCabe Road to Correll Road. IID's existing "PW" 92kV transmission line with a distribution (T-321 Circuit) 7.2/12.5kV underbuilt would remain in between the proposed undergrounding/pipelining. Horizontal, vertical distances and finish grades, the need for access to operate and maintain water and electrical facilities during and after the pipelining process are of concern.

- To ensure there are no impacts to IID water facilities, Applicant should submit grading, drainage and fencing plans to IID Water Department Engineering Services for review and comment prior to final project design and Tract Map approval.
- Fences should be installed at the boundary of IID's right of way (ROW) for safety and to allow access for IID operation and maintenance activities. The project's fencing plan should address IID's ROW.
- Applicant will be required to provide ROWs and easements for any infrastructure needed to serve the project as well as access for operation and maintenance of any IID facilities on adjoining properties.
- Applicant will be required to bear all costs for acquisition of ROWs, public utility easements, and infrastructure relocations for street or road improvements.
- Public utility easements over all private and public roads, plus 10 feet in width on both sides, shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.
- Any construction or operation on IID property, ROWs or easements will require an encroachment permit, or encroachment agreement.
- IID claims, at a minimum, a prescriptive ROW to the toe of slope of all existing canals and drains. IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
- Should the development want site access from La Brucherie Road, an IID crossing and encroachment permit will be required.
- New, relocated, modified or reconstructed IID facilities required for and by the project must be included as part of the project's CEQA documentation, analysis and mitigation.
- A circuit study/distribution impact study, facility study, and/or system impact study must be performed to evaluate the project's impacts to IID's electrical grid, considered under the environmental factors "Utilities and Services" Section of the Initial Study Checklist to determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects.
- IID Energy service to the McCabe Ranch subdivision will require the developer to provide public utility easements (PUE) for ingress and egress of both transmission lines and distribution line along McCabe Road and Farnsworth which will include a new substation at the southwest Corner of Farnsworth and McCabe Road for off -site improvements.

It should be noted that the proposed Project does not include access from La Brucherie Road. This issue will not be addressed further in the EIR.

4.12.2 Summary of Prior Certified EIR Findings

Impacts to public utility and service systems were evaluated in Section 4.15 of the Certified EIR. The Certified EIR found that implementation of the McCabe Ranch II Specific Plan would result in the following:

- The need for new water supplies and construction of new water facilities to serve the water supply needs of the project;
- An increase in demand for sewer capacity and require extension of the existing wastewater system;
- An expansion of electrical services which would require additional infrastructure on the project site;
- An increased demand for natural gas services; the availability of which to serve the proposed project has not been established; and
- Require the extension of telephone and cable service infrastructure to accommodate new development.

These impacts were all considered to be potentially significant.

Mitigation measures MM 4.15.1.1 and MM 4.15.2.1 which required applicants of future developments to contribute to the Heber Public Utilities District (HPUD) their fair-share payment for new infrastructure. These measures were found to reduce would reduce impacts to water, wastewater, to below a level of significance.

Impacts to electrical services were determined to be reduced to below a level of significance by MM 4.15.3.1. This measure requires applicants of future development to provide the County proof that the Imperial Irrigation District (IID) will provide electrical services. Similarly, MM 4.15.3.2 and 4.15.3.3 required the provision of will serve letters or agreements from the Southern California Gas Company (SCGC), AT&T and Adelphia Cable specifically stating their ability to serve the development with natural gas, telephone and cable services.

The Certified EIR found that implementation of the McCabe Ranch II Specific Plan would increase solid waste generation and the demand for solid waste disposal. Sufficient capacity was found to be available at the Allied Imperial Landfill, and curbside pickup would be negotiated through a contract with Palo Verde Disposal Services, HPUD's designated service provider. Therefore, impacts to solid waste were considered to be less than significant and no mitigation measures were identified.

4.12.3 Environmental Setting

The Heber Public Utility District (HPUD) provides potable water treatment and distribution services, wastewater collection and treatment services (i.e., sewer services) , solid waste disposal

services (trash), parks and recreation, and street lighting to residents within the District's service area. As noted within the Heber Public Utility District's 2018 Service Area Plan, the Heber HPUD boundary is uniquely shaped and is generally described as bound by Correll Road to the north, (inclusive of 79 acres located at the northwest corner of Correll Road and Dogwood Road), extending south to Jasper Road, Pitzer Road to the east, and reaching what would be an extension of Farnsworth Road to the west (HPUD, 2018).

The Sphere of Influence for the HPUD is a much broader area intended to accommodate future growth. Growth within the Sphere of Influence (SOI) is planned for and taken into account under the Service Area Plan. The SOI defines the primary area within which urban development is encouraged and limits the areas to which services should be extended. HPUD's Service Area boundary and its SOI boundaries are presented on **Figure 4.12-1.** As shown on **Figure 4.12-1**, the adopted McCabe Ranch II Specific Plan Area is located within the Heber PUD Sphere of Influence. Additionally, the McCabe Ranch II Specific Plan and its associated development are taken into account in the Service Area Plan. However, in order for services to be provided, the Specific Plan Area must be annexed into the District. This annexation must be reviewed and approved by the Local Agency Formation Commission and the Heber Public Utilities District.

4.12.3.1 Water and Wastewater Treatment

The HPUD receives raw water from the IID, from the Central Main Canal through the Dogwood Canal to Gate 37A. As of 2018, the HPUD water system supplied water for domestic purposes to approximately 3,508 consumers through a total of about 1,509 water service connections. The two (2) million gallon per day (MGD) water treatment system operates 24 hours daily. Wastewater service to the McCabe Ranch II Specific Plan area would also be provided by the HPUD. The HPUD Wastewater Treatment Plant is a modified activated sludge plant which uses microorganisms to stabilize and treat the incoming wastewater. The final wastewater effluent is then discharged to the Central Drain 3-D No. 1, an Imperial Valley drain and tributary to the Alamo River within the Salton Sea watershed. HPUD is currently in the process of expanding its wastewater treatment facility based on system demand.

The IID provides electrical service to the project area. The closest existing lines to the Specific Plan area are located within the central portion of the site, along the north-south main entry parkway. Other existing IID transmission lines are located along Dogwood Road to the east and adjacent to the Union Pacific Railroad.

4.12.3.2 Existing Water Service

Water Supply and Delivery

Surface Water

The source of virtually all surface waters in Imperial County is the Colorado River. The water is diverted from the Colorado River at the Palo Verde Weir north of Blythe by the Palo Verde Irrigation District for use in the Palo Verde Valley of northeast Imperial County and southeast Riverside County, and at the Imperial Dam into the All-American Canal by the IID and the Bard Irrigation District for use in the Imperial, Yuma, Bard, and Coachella valleys. The 82-mile All-American Canal, the 3-mile New Briar Canal, and 52 miles of drains are owned by the Bureau of Reclamation (Reclamation) and are operated and maintained by IID.

Imperial Irrigation District

The IID was formed to acquire properties of the bankrupt California Development Company and its Mexican subsidiary. By 1922, the IID had acquired 13 mutual water companies and was delivering water to nearly 500,000 acres. Since 1942, water has been diverted at Imperial Dam on the Colorado River through the All-American Canal, which the IID operates and maintains. IID owns and operates a 1,590-mile network of main canals and laterals to serve approximately 500,000 acres of irrigated farm land. Today, the IID provides irrigation water and electric power to farmers, residents and businesses in the lower southeastern portion of Imperial County (Dubose, 2025; Appendix F).

Heber Public Utility District (HPUD)

The McCabe Ranch II Specific Plan is located adjacent to the HPUD service area (**Figure 4.12-1**). The Project site is not currently part of the HPUD and would require annexation to receive services. The HPUD Service Area Plan (HPUD SAP), adopted on April 19, 2018; identifies the existing water and wastewater treatment facilities, the present capacity and demand, and future needs. The HPUD water system supplies water for domestic purposes to approximately 6,979 consumers through a total of about 1,785 water service connections (HPUD, 2018). The HPUD currently owns a Water Treatment Plant (WTP) with a capacity of 4.0 MGD which was constructed in 2017. The average daily demand for the WTP in 2016 was 1.136 MGD with a maximum demand of 1.754 MGD. The 2017 logs documented similar average daily demands of 1.142 MGD with a maximum of 1.715 MGD. Thus, the plant was operating at a maximum of 42 percent of its total capacity (HPUD, 2018).

The HPUD owns and operates a Raw Water Transmission Pipeline that will continuously feed the WTP up to 7 MGD. Aside from the continuous flow of raw water from the Raw Water Transmission Pipeline, the WTP's raw water storage consists of three (3) raw water pre-sedimentation basins. The total raw water storage capacity for all three basins is 22.4 acre-feet or approximately 7.3 million gallons (MG) (HPUD, 2018). The State of California required HPUD to have a raw water storage

capacity of six (6) days. This is equivalent to 12 MG of raw water storage. The HPUD was deficient 4.7 MG with respect to raw water supply at the 2 MGD capacity. Since the Central Main Canal is almost never taken out of service it was considered a reliable water source (HPUD, 2018). The HPUD constructed a potable raw water pump station to meet the State's raw water storage demands.

The Static Mixer Facility receives raw water from the IID Dogwood Canal and/or Central Main Canal. The Static Mixer Facility has two (2) 18-inch inline static mixers. Each mixer is capable of blending coagulants into the raw IID water for flows from 1 to 4 MGD. Water will be conveyed to the existing three (3) downstream Raw Water Storage Basins from the Static Mixer Facility via gravity pipelines installed in 2017 (HPUD, 2018).

The Raw Water Pump Station consists of a wet well and three (3) variable speed vertical turbine pumps. Two pumps are duty pumps capable of pumping up to 4 MGD to the Clarifier/Filter Treatment Units and one pump is a standby variable speed pump. Each pump has a capacity of 2 MGD. Water will be conveyed to the new and existing Clarifier/Filter Treatment Units from the Raw Water Pump Station via new force-main pipelines (HPUD, 2018).

The Clarifier/Filter Treatment Units are two (2) 2 MGD Treatment Units. Two units will normally operate, and one will remain on standby. The new and existing units are self-contained, complete with treatment units including clarifier flush and filter backwash piping, valves and controls. Treated water will be conveyed to the expanded Finish Water Transfer Pump Station via gravity pipelines. Filter backwash and clarifier flush water will be conveyed by gravity to the existing Filter Backwash Settling Basins (HPUD, 2018).

The Finish Water Transfer Pump Station consists of one (1) new and two (2) existing constant speed vertical turbine pumps. Each pump has a capacity of two (2) MGD. Two (2) constant speed pumps will normally operate while one constant speed pump will be on standby. Water will be conveyed to the three (3) existing ground storage reservoirs from the Finish Water Transfer Pump Station via piping. In general, all the discharge is directed to the 0.75 MG reservoir. Chlorine is injected in the finished water force main (HPUD, 2018).

The High Service Pump Station was constructed in 2017 and consists of four (4) variable speed centrifugal pumps. Each pump is capable of pumping 1,500 gallons per minute (GPM) at 80 pounds per square inch (PSI). Up to three (3) pumps will normally operate to supply up to 4,500 GPM to the distribution system with one pump will remaining on reserve for additional peak flow demand and redundancy purposes. The new High Service Pump Station potable water is connected to the HPUD Distribution System via new and existing pipelines (HPUD, 2018).

Three (3) Finished Water Storage Reservoirs were constructed to allow the reservoirs to operate in series with flow from the Finished Water Pump Station entering the 0.75 MG reservoir. The outlet from the 0.75 MG reservoir is piped to the inlet to the 1.7 MG reservoir. The outlet from the 1.7 MG

reservoir is piped to the 3.0 MG reservoir. The pipe sizes and connections to the reservoirs allow the entire plant capacity to flow from tank to tank, for series operation (HPUD, 2018).

The potable water distribution system consists of approximately 135,000 linear feet (LF) (25.5 miles) of pipeline. Of the total water pipelines in the network, there is approximately 8,500 LF of 4-inch diameter asbestos cement pipe, 5,080 LF of 6-inch diameter asbestos pipe, 64,800 LF of 8-inch diameter PVC pipe, 10,130 LF of 10-inch diameter PVC pipe, 35,000 LF of 12-inch diameter PVC pipe, 1,000 LF of 18-inch diameter PVC pipe, and 2,450 LF of 20-inch diameter PVC pipeline. The PVC pipe has been installed since the mid to late 1980's. The normal operating pressure of the distribution system is between 50 to 55 pounds per square inch (psi) (HPUD, 2018).

Because the adopted McCabe Ranch II Specific Plan area is under agricultural development, no potable water services are provided.

4.12.3.3 Existing Wastewater Treatment Service

The existing wastewater treatment plant (WWTP) is currently located on a 6.7-acre site. The HPUD has acquired 8.55 acres of property east of and adjacent to the existing 6.7-acre site for future expansion purposes. In addition, the HPUD owns 19.27 acres west of the existing wastewater treatment plant bounded by Rockwood Avenue on the east, Correll Road on the north and the Union Pacific Railroad tracks on the west. The 8.55-acre parcel could be used for future WWTP expansions as necessary while the 19.27-acre site may be restricted to recreational use if the HPUD decides to dedicate it as a regional park (HPUD, 2018).

The existing WWTP consists of an influent channel facility, influent pump station, a headworks facility, an aerator system, two (2) oxidation ditches, two (2) secondary clarifiers, an ultra violet (UV) disinfection system, two (2) return activated sludge (RAS) pumps and two (2) return and waste activated sludge (WAS) pumps, scum lift station, a sludge thickener facility and a sludge digester facility, sludge dewatering facilities and sludge drying beds, an operations building, electrical power facilities and instrumentation and control facilities (HPUD, 2018). The WWTP has a current design and permitted capacity of 1.2 MGD. The average daily flow received at the HPUD Wastewater Plant in 2016 was approximately 0.462 MGD with peak flows of 0.609 MGD. Thus, the WWTP is operating at less than 50 percent of capacity. The averages daily flows and peak flows for 2017 (as of October 2017) were marginally lower (HPUD, 2018).

The existing wastewater collection system is composed of sanitary sewer gravity pipelines, sanitary sewer force mains and wastewater pump stations. The collection system conveys wastewater from the residential, commercial, industrial, institutional, government, school and church developments in the community to the HPUD WWTP. The HPUD Collection System serves users within the HPUD boundary except for a few users located on the exterior edges of the HPUD Boundary, but within the Sphere of Influence (HPUD, 2018).

A deep gravity 30-inch diameter PVC sanitary sewer pipeline flows to the HPUD Regional Pump Station located at the southeast corner of Rockwood Avenue and Correll Road within the north end of the existing HPUD WWTP compound. There are a total of seven wastewater pump stations within the HPUD Collection System. HPUD owns and operates one main Regional Pump Station. The Regional Wastewater Pump Station serves as the "backbone" collection system infrastructure to extend a network of additional main collector gravity pipelines to serve the HPUD Service Area while the remaining stations are auxiliary. The Regional Pump Station can accommodate peak wastewater flows of 9.2 MGD (average daily flow of 4.3 MGD). The existing wastewater treatment plant is rated at a capacity of 1.2 MGD. The HPUD Regional Pump Station can transmit 7.6 times the flow that the HPUD WWTP is capable of treating (HPUD, 2018).

4.12.3.4 Existing Stormwater and Drainage

Drainage facilities in unincorporated communities and within public roadways are owned by Imperial County, while the broader drainage system in the entire Imperial Valley are within the jurisdiction of IID. In conjunction with an irrigation network that includes more than 1,600 miles of canals, IID operates and maintains an agricultural drainage system consisting of more than 1,400 miles of surface drains. The HPUD discharges into the Central Drain (owned by IID) which ultimately drains into the Alamo River, a tributary to the Salton Sea. It should be noted, however, that the primary drainage system managed by IID is not designed to convey all stormwater runoff from urbanized areas. Therefore, new development must provide for on-site retention of stormwater to mitigate against stormwater impacts which are managed by the Imperial County unless a project specific agreement has been entered with the HPUD for operation and maintenance.

The IID maintains an extensive gravity flow drainage system that serves the entire Imperial Valley. The native material and concrete lined lateral drain system was designed to provide a drainage outlet for each governmental subdivision of approximately 160 acres. The IID allows a single 12-inch diameter pipe for every 160 acres. The IID is obligated to provide its drains at sufficient depth, generally 6-10 feet deep in order to be able to accept tile drain discharge. Where the drain cannot be maintained at sufficient depth, a sump and pump are provided and maintained by the IID. Development within the HPUD ultimately discharges into the Central Drain, which is located to the north or the Date Drain located to the West of the Heber community.

Before stormwater is received by IID facilities, it channels through a drainage system which includes various retention basins throughout the District. Not all retention basins within the Sphere of Influence and official District boundary are owned by HPUD. Some of the retention basins identified within the HPUD boundary are listed in **Table 4-12-1**.

TABLE 4.12-1. STORMWATER RETENTION BASINS WITHIN HPUD

Size (acres)	APN	Location	Owner
5.37	054-621-001	Southwest Corner of Black Hills Road and Cherry Avenue (Estancia)	HPUD
1.65	054-621-002	Southwest Corner of Black Hills Road and Cherry Avenue (Estancia)	HPUD
4.35	054-634-001	Southeast Corner of Cherry St. and 2nd Street (Tito Park Area)	HPUD
6.03	054-634-002	Northwest Corner of Hawk Street and Palm Avenue (Tito Park Area)	HPUD
3.59	054-493-001	Southeast Section of Heber Avenue and Correll Road (off of Heber Avenue)	HPUD
6.22	054-605-009	Southwest Corner of Correll Rd. and Bloomfield St.	Heber Meadows I LLC & Meadows LLC

Source: HPUD 2018.

The Correll Road basin (APN 054-605-009) was not satisfactorily improved by the developer and the HPUD has been working with Imperial County on acceptable solutions including dual use. As of the date of the HPUD SAP it had been determined that HPUD would place submersible pumps into the Correll basin to drain any standing stormwater and ensure proper drainage within 72 hours of any storm events (HPUD 2018).

4.12.3.5 Existing Electrical, Natural Gas, Telephone and Cable Services

Electrical

The IID provides electrical service to the Project area. The closest existing lines to the Project area are located within the central portion of the site along the north-south Main Entry Parkway. Other existing IID transmission lines are located along Dogwood Road to the east and adjacent to the Union Pacific Railroad.

Natural Gas

The Southern California Gas Company (SCGC), a public utility under the jurisdiction of the California Public Utilities Commission (CPUC), provides natural gas to the unincorporated Heber community. SCGC is the nation's largest natural gas distribution utility, serving a population of 19.8 million consumers through 5.6 million gas meters in more than 500 communities. The company's service territory encompasses approximately 20,000 square miles throughout Central and Southern California, from Visalia to the Mexican border. SCGC is a public utility under the jurisdiction of the California Public Utilities Commission and may be affected by actions of federal energy regulatory agencies. Delivery of natural gas service to individual projects within the SPA would be reviewed by the SCGC at the time such projects are proposed.

Telephone / Cable

AT&T Communications provides telephone services in the Heber area. No existing telephone or cable service lines currently run to the Specific Plan Area.

4.12.3.6 Existing Solid Waste Facilities

The HPUD provides solid waste collection and disposal services through a third-party contract. In October 2011, the HPUD approved a resolution authorizing the transfer of the franchise agreement from Palo Verde Valley Disposal Service to CR&R Waste and Recycling Services Incorporated (CR&R) for the collection, transportation, recycling and disposal of solid waste, recyclable and compostable materials (Resolution 2011-14). The current agreement is in place through 2027 (Resolution 2022-19).

CR&R disposes of solid waste collected in Heber at the Imperial Allied Waste Landfill, a privately-owned landfill, located within an unincorporated area east of the City of Imperial. The landfill was recently expanded and has a disposal capacity of 1.5 million cubic yards and is permitted to accept municipal solid waste until December 31, 2051. The current demand for solid waste facilities is based on the collection of solid waste by CC&R. An estimated 2,788 tons of solid waste are collected annually from the Heber community (HPUD, 2018).

4.12.4 Regulatory Setting

4.12.4.1 Federal

Clean Water Act

In 1972, the Clean Water Act (CWA) was adopted to protect the waters of the nation. The Environmental Protection Agency (EPA) and corresponding state agencies regulate public wastewater systems to ensure compliance with the CWA. To implement the CWA regulatory standards, the National Pollutant Discharge Elimination System (NPDES) Permit Program was instituted.

The CWA requires that all point sources discharging pollutants into waters of the United States must obtain a NPDES permit. By point sources, EPA means discrete conveyances such as pipes or man-made ditches. Although individual households do not need permits, facilities must obtain permits if their discharges go directly to surface waters. Some pollutants that may threaten public health and the nation’s waters include human waste, ground-up food from sink disposals, laundry and bath water, toxic chemicals, oil and grease, metals, and pesticides.

National Pollutant Discharge Elimination System Permit

Discharge of treated wastewater to surface water(s) of the United States, including wetlands, requires a National Pollutant Discharge Elimination System (NPDES) Permit. In California, the

Regional Water Quality Control Boards (RWQCB) administers the issuance of these federal permits. Obtaining an NPDES permit requires preparation of detailed information, including characterization of wastewater sources, treatment processes, and effluent quality. Whether or not a permit may be issued and the conditions of a permit are subject to many factors such a basin plan water quality objectives, impaired water body status of the receiving water, historical flow rates of the receiving water, effluent quality and flow, the State Implementation Plan (SIP) and the California Toxics Rule, and established Total Maximum Daily Loading (TMDL) rates for various pollutants. These factors are highly specific to the potential discharge point. Obtaining an NPDES permit is generally considered difficult in inland areas and may not be possible in sensitive areas.

4.12.4.2 State

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) was created by the Legislature in 1967. The mission of the SWRCB is to ensure the highest reasonable quality for waters of the state, while allocating those waters to achieve the optimum balance of beneficial uses. The joint authority of water allocation and water quality protection enables the SWRCB to provide comprehensive protection for California's waters.

There are nine Regional Water Quality Control Boards in the State. The mission of the RWQCBs is to develop and enforce water quality objectives and implement plans which will best protect the beneficial uses of the state's waters, recognizing local differences in climate, topography, geology, and hydrology. The proposed project falls within the Colorado River Basin RWQCB's (CRBRWQCB) jurisdiction. The CRBRWQB regulates the discharge of waste to surface waters (rivers, streams, lakes, wetlands, and the Pacific Ocean) as well as to storm drains, to the ground surface, and to groundwaters.

The CRBRWQCB implements the NPDES permit program. NPDES permits can be referred to as waste discharge requirements and are issued to regulate the discharge of municipal wastewater or industrial wastewaters, commercial wastewater, treated groundwater from cleanup projects, and/or other wastes into surface waters. If the waste discharge consists only of non-processed stormwater, it may be regulated under the NPDES stormwater program. The discharge of waste to the ground surface or to groundwater is regulated under the Non-Chapter 15 Permitting, Surveillance, and Enforcement Program. General NPDES permits are issued under the Spills, Leaks, Investigations and Cleanup program to regulate the year-round discharge to surface waters of highly treated groundwater extracted from cleanup projects involving volatile organic compounds.

Urban Water Management Planning Act - Assembly Bill 797

The Urban Water Management Planning Act was established by Assembly Bill (AB) 797 on September 21, 1983. Passage of this law was recognition by state legislators that water is a limited resource and a declaration that efficient water use and conservation would be actively pursued

throughout the state. The law requires water suppliers in California, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet per year of water, to prepare and adopt a specific plan every five years which defines their current and future water use, sources of supply and its reliability, and existing conservation measures.

California Water Code

California Water Code (CWC) Sections 10656 and 10657 restrict state funding for agencies that fail to submit their urban water management plan to the State Department of Water Resources. In addition, CWC Section 10910 describes the water supply assessment that must be undertaken for projects referred under Public Resources Code (PRC) Section 21151.9, including an analysis of groundwater supplies. Water agencies are given 90 days from the start of consultation in which to provide a water supply assessment to the CEQA lead agency. CWC Section 10910 also specifies the circumstances under which a project for which a water supply assessment was once prepared would be required to obtain another assessment. CWC Section 10631 directs that contents of urban water management plans include further information on future water supply projects and programs and groundwater supplies.

Senate Bill 610 and 221

Senate Bill (SB) 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001) amended State of California law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 are companion measures that seek to promote more collaborative planning between local water suppliers and cities and counties. Both statutes require detailed information regarding water availability to be provided to city and county decision-makers prior to approval of specified large development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Both measures recognize local control and decision making regarding the availability of water for projects and the approval of projects.

CWC Sections 10910–10915 require lead agencies to identify the public water system that may supply water for a proposed development project and to request from that public water system a water supply assessment (WSA) for the proposed Project. The purpose of the WSA is to demonstrate that the public water system has sufficient water supplies to meet the water demands associated with the proposed Projects in addition to meeting the existing and planned future water demands projected for the next 20 years. A WSA is required for:

- A proposed residential development of more than 500 dwelling units.
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- A proposed hotel or motel, or both, having more than 500 rooms.
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40-acres of land, or having more than 650,000 square feet of floor area.
- A mixed-use development that includes one or more of the uses described above.
- A development that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling-unit project.
- For lead agencies with fewer than 5,000 water service connections, any new development that would increase the number of water service connections in the service area by 10 percent or more.

4.12.4.3 Regional

Southern California Association of Governments Policies

The Southern California Association of Governments' (SCAG) Intergovernmental Review (IGR) section, part of the Environmental Planning division of Planning and Policy, is responsible for performing consistency review of regionally significant local plans, projects, and programs. Regionally significant projects are required to be consistent with SCAG's adopted regional plans and policies.

4.12.4.4 Local

Imperial Integrated Regional Water Management Plan

The Imperial Integrated Regional Water Management Plan (IRWMP) serves as the governing document for regional water planning to meet present and future water resource needs and demands by addressing such issues as additional water supply options, demand management and determination and prioritization of uses and classes of service provided. In November 2012, the Imperial County Board of Supervisors approved the Imperial IRWMP, and the City of Imperial City Council and the IID Board of Directors approved it in December 2012. Through the IRWMP process, IID presented various options to the region's stakeholders that would be implemented in the event long-term water supply augmentation is needed, such as water storage and banking, recycling of municipal wastewater, and desalination of brackish water.

Heber Public Utilities District Service Area Plan

In 1997, AB 1484 established the Commission of Local Governance for the 21st Century. The role of the Commission of Local Governance was to evaluate local government organization and

operational issues and develop a statewide vision and determine how the State should grow. Within this framework, the Local Governance Commission concluded that Local Agency Formation Commission's (LAFCO's) powers should be expanded and be a participant in regional growth and planning forums. Further, the Local Governance Commission recommended that State law be amended to require that "spheres of influence" be regularly updated and that LAFCO's initiate periodic regional municipal service reviews, also known as service area plans, to ensure the efficient provision of governmental services. A sphere of influence is defined by law as a "…plan for the probable physical boundaries and service area of a local agency, as determined by the commission" (GC 56076).

As a result of the Local Governance Commission's recommendations, on September 26, 2000, Governor Gray Davis signed into law AB 2838, titled the Cortese-Knox-Hertzberg Local Government Reorganization Act. The Cortese-Knox-Hertzberg Act requires each LAFCO to review and update as necessary the spheres of influence for all applicable agencies within each County. In Imperial County, service area plans are recommended to be updated every five years to be in compliance (Governor's Office of Planning and Research, LAFCO Municipal Service Review Guidelines, p.10 2003.) The 2017 HPUD SAP is an update from HPUD's last adopted SAP in 2012.

Imperial County Local Area Formation Commission (LAFCO)

The Imperial County LAFCO is an independent local government agency that oversees boundary changes such as annexations, detachments, incorporations, and extension of services between the county, the cities, and the special districts such as the HPUD. The sphere of influence for each governmental agency is a plan for its future boundary and service area. LAFCo's function is outlined in Government Code Section 56000 et. seq. known as the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

County of Imperial General Plan

The Imperial County General Plan provides goals, objectives, policies, and programs regarding the preservation and use of water. **Table 4.12-2** provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed project. While the EIR analyzes the project's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 4.12-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Agricultural Element		
Goal 4: Water Availability and Conservation: • Maximize the inherent productivity of Imperial County's agricultural resources by ensuring future availability of adequate and affordable irrigation water and by managing water such that it is used effectively and not wasted.:	Yes	The proposed Project would utilize water from the Heber Public Utility District (HPUD). The proposed Project would result in an overall decrease in water use from that used for agricultural purposes. Thus, the proposed Project would result in more water available for agricultural use due to the overall decrease in water use. The proposed Project would implement water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible.
Conservation and Open Space Element (COSE)		
COSE Goals 6: The County will conserve, protect, and enhance water resources in the County. • **COSE Objective 6.1**: Ensure the use and protection of all the rivers, waterways, and groundwater sources in the County for use by future generations. • COSE Objective 6.4: Eliminate potential surface and groundwater pollution through regulations as well as educational programs.	Yes	The proposed Project will comply with the General Stormwater Construction Permit and the Industrial Discharge permit to ensure that water runoff from the site would not pollute surface or groundwater resources.
Water Element (WE)		
Adequate Domestic Water Supply WE Goal 1: The County will secure the provision of safe and healthful sources and supplies of domestic water adequate to assure the implementation of the County General Plan and the long-term continued availability of this essential resource. • WE COSE Objective 1.1 The efficient and cost-effective utilization of local and imported water resources through the development and implementation of urban use patterns.	Yes	The proposed Project would implement water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible. The water supply assessment (WSA) determined that there would be sufficient water available to meet the proposed Project's demand.

TABLE 4.12-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Adequate Domestic Water Supply Policy 1: The efficient regulation of land uses that economizes on water consumption, enhances equivalent dwelling unit demand for domestic water resources, and that makes available affordable resources for continued urban growth and development.	Yes	The proposed Project would implement water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible. The water supply assessment (WSA) determined that there would be sufficient water available to meet the proposed Project's demand. .
Coordinated Water Management Goal 5: Water Resources shall be managed effectively and efficiently through inter-agency and inter-jurisdictional coordination and cooperation.	Yes	The proposed Project would implement water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible.
Coordinated Water Management Policy 1: Encourage and provide inter-agency and interjurisdictional coordination and cooperation for the management and wise use of water resources for contact and non-contact recreation, groundwater recharge, hydroelectric energy production, and wildlife habitat as well as for domestic and irrigation use.	Yes	The proposed Project sets forth continued cooperation and coordination between Imperial County and other Local, State and Federal agencies involved in water resources conservation. Water resources are conserved and managed effectively and efficiently for all approved beneficial purposes. Therefore, the proposed Project is consistent with and results in the implementation of this policy of the General Plan.

Source: Imperial County, 1997, 2015, 2016.

4.12.5 Thresholds of Significance

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage facilities, the construction or relocation of which could cause significant environmental effects?
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
3. 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?
4. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

4.12.6 Analysis of Project Impacts and Significance Determination

Impact 4.12-1: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage facilities, the construction or relocation of which could cause significant environmental effects?

Previously Identified Level of Significance

The Certified EIR determined that the project would require the construction of new water facilities to serve the water supply needs of the project. The Certified FEIR also found that the project would result in an increase in the demand for sewer capacity and require the extension of the existing wastewater system to the SPA. However, with mitigation incorporated, these impacts were reduced to a less than significant level.

Proposed Project Impact Analysis

Water Service

The HPUD currently owns a WTP with a capacity of 4.0 MGD which was constructed in 2017. The plant is operating at a maximum of 42 percent of its current capacity (HPUD, 2018). As discussed in the water demand section below, the WTP and associated infrastructure currently has the capacity to treat the potable water required for the proposed Project. The SPA area does not currently have any potable water service. Potable water would be distributed throughout the Project area via a looping network of water lines provided within the internal street rights-of-ways. The exact number and location of water utility improvements will be determined when the final site, grading, and utility plans are prepared by the project engineer, subject to review and approval by the County of Imperial, HPUD, and IID.

The WTP has a remaining capacity of over 2 MGD. Development of the proposed Project would result in an increase in total water demand of 1.12 MGD (**Table 4.12-3**), which would not exceed the remaining capacity of the WTP. Thus, development of the proposed Project would not result in a requirement for construction of new water treatment facilities. Thus, impacts to water treatment facilities would be less than significant.

According to the 2018 HPUD SAP, if development (including the proposed Project) occurs at the same pace it had in the previous seven years, the water treatment plant would be at 40% capacity in 2040. This assumes a water demand of 125 gallons per person per day. Since there would be plenty of capacity in the historic growth rate scenario, no further analysis was conducted.

TABLE 4.12-3. PROJECT WATER TREATMENT DEMAND

Development Types	Phase 1		Phase 2		Phase 3		Total Water Demand	Phase 4		Total Water Treatment Demand (Gallons)
	DU	Water Treatment (Gallons)*	DU	Water Treatment (Gallons)*	DU	Water Treatment (Gallons)*	Phases 1-3	DU	Water Treatment (Gallons)*	Water Treatment (Gallons)*
Single Family (SF)										
Traditional Single Family	0	0	294	143,472	239	116,632	260,104	36	17,568	277,672
Small Lot Single-Family	157	76,616	100	48,800	0	0	125,416	149	72,712	198,128
Flex Lot Single-Family	157	76,616	0	0	88	42,944	119,560	237	115,656	235,216
Mini Estate	0	0	0	0	19	9,272	9,272	0	0	9,272
Estate Lot	0	0	25	12,200	0	0	12,200	0	0	12,200
SF Subtotal	***314***	***153,232***	***419***	***204,472***	***346***	***168,848***	***526,552***	***422***	***205,936***	***732,488***
Multi-Family (MF)										
Multi-Family 1 (NW Corner)	0	0	196	95,648	0	0	95,648	0	0	95,648
Multi-Family 2 (NE Corner)	0	0	0	0	335	163,480	163,480	0	0	163,480
Multi-Family 3	0	0	0	0	0	0	0	268	130,784	130,784
MF Subtotal	***0***	***0***	***196***	***95,648***	***335***	***163,480***	***259,128***	***268***	***130,784***	***389,912***
TOTAL	314	153,232	615	300,120	681	332,328	785,680	690	336,720	1,122,400

Note: *Number of DU X 391 gallons per EDU

However, in a total buildout scenario where all developable parcels are built out during the 2018 SAP's planning horizon, including the proposed Project, there would be an additional 5,682 equivalent dwelling units (EDU's). Capacity would be reached just after 2040 (**Table 4.12-4**).

TABLE 4.12-4. TOTAL BUILDOUT DEMAND FOR WATER TREATMENT PLANT

Year	EDU's	Total Water Demand	Percent Capacity
2020	2,526	1.5 MGD	37%
2025	3,761	2.1 MGD	53%
2030	4,997	2.7 MGD	69%
2035	6,232	3.3 MGD	84%
2040	7,467	3.9 MGD	99%

Note: Assumes an EDU of 488 gallons per day or 125 gallons/day per person of water demand due to conservation efforts.
Source: Dubose Design Group, 2025.

If total buildout were to occur a second expansion of the WTP would be necessary by year 2035 based on the projected population growth. The second proposed expansion to the wastewater treatment plant will increase capacity from 4.0 MGD to 6.0 MGD and be able to serve the projected growth beyond 2035. The proposed Project would result in the need for expansion of existing water treatment facilities to serve the water supply needs of the project. This impact is considered potentially significant. Implementation of mitigation measures MM 4.15.1.1a and b and MM 4.15.1.2 would reduce these impacts to below a level of significance.

It should also be noted that the McCabe Specific Plan includes policies that require the avoidance of direct interface with the IID's canals.

Wastewater Services

The WWTP has a current design and permitted capacity of 1.2 MGD. The average daily flow received at the HPUD Wastewater Plant in 2016 was approximately 0.462 MGD with peak flows of 0.609 MGD. The 2017 average daily wastewater flow entering the HPUD wastewater treatment plant was 0.437 MGD. However, the previous HPUD SAD documented that the 2010 average daily flows were 0.6 MGD. The decrease in average daily flows may be attributed to recent efforts in water conservation. While the HPUD will continue to encourage water conservation measures, the 2017 HPUD SAP uses 600,000 gallons per day as the basis for planning future capacity. As such, the 1.2 MGD WWTP is expected to have a current excess capacity of 0.6 MGD to accommodate future growth.

According to the 2018 SAP, the residential per capita housing density in Heber was 3.91 persons per residence.

An EDU within the HPUD is defined as the amount wastewater generation in a day by a single-family residential housing unit. Therefore, the excess capacity of the WWTP (600,000 gpd) can accommodate an additional 1,535 single-family residences or 1,535 EDUs (HPUD, 2018).

Development of the proposed Project would result in an increase in total wastewater demand of 0.94 MGD (**Table 4.12-4**) which would exceed the remaining capacity, 0.6 MGD, of the WWTP. The proposed Project would result in the need for expansion of existing wastewater treatment facilities to serve the water supply needs of the project. This impact is considered potentially significant. Implementation of MM 4.15.1.1a and b and MM 4.15.1.2 would reduce these impacts to below a level of significance.

TABLE 4.12-4. PROJECT WASTEWATER TREATMENT DEMAND

Development Types	Phase 1 (1A/1B)		Phase 2 (2A/2B)		Phase 3 (3A/3B/3C)		Total Water Demand	Phase 4		Total Demand
	DU	Demand	DU	Demand	DU	Demand	Phases 1-3	DU	Demand	
Single Family (SF)										
Traditional Single Family	0	0	294	115,624	239	93,449	209,073	36	14,076	223,149
Small Lot Single-Family	157	61,387	100	39,100	0	0	100,487	149	58,259	158,746
Flex Lot Single-Family	157	61,387	0	0	88	34,408	95,795	237	92,667	188,462
Mini Estate	0	0	0	0	19	7,429	7,429	0	0	7,429
Estate Lot	0	0	25	9,775	0	0	9,775	0	0	9,775
SF Subtotal	***314***	***122,774***	***419***	***164,499***	***346***	***135,286***	***422,559***	***422***	***165,002***	***587,561***
Multi-Family (MF)										
Multi-Fam. 1 (NW Corner)	0	0	196	76,636	0	0	76.636	0	0	76.636
Multi-Fam. 2 (NE Corner)	0	0	0		335	164,485	164,485	0	0	164,485
Multi-Fam. 3	0	0	0		0	0	0	268	104,788	104,788
MF Subtotal	***0***	***0***	***196***	***76,636***	***335***	***164,485***	***241,481***	***268***	***104,788***	***349,909***
TOTAL	**314**		**615**	**241,085**	**681**	**299,771**	**664,040**	**690**	**269,790**	**937,470**

Note: * Demand = Number of DU x 391 gallons per EDU.
Source: Dubose Design Group, 2025.

According to the 2018 HPUD SAP, if development occurs at the same pace it had in the previous seven years (i.e., 2011 to 2017), there would be plenty of capacity until 2040. This assumes that

growth would continue at 2.71% per year and that it be predominantly attributed to residential development. In the unlikely scenario that all residential and non-residential, infill, planned, and approved development are built out during the 20-year planning horizon, it is expected that the 1.2 MGD Wastewater Treatment Plant will reach capacity by the year 2025 using the flow demand of 391 gallons per EDU (**Table 4.12-5**).

TABLE 4.12-5. TOTAL BUILDOUT DEMAND FOR WATER TREATMENT PLANT

Year	EDU's	Total Water Demand	Percent Capacity
2020	2,526	0.99 MGD	82%
2025	3,761	1.5 MGD	125%
2030	4,997	1.99 MGD	165%
2035	6,232	2.46 MGD	205%
2040	7,467	2.95 MGD	246%

Note: Assumes an EDU of 391 gallons per day or 125 gallons/day per person of wastewater generation.
Source: Dubose Design Group, 2025.

The proposed Project would result in the need for construction of new wastewater facilities to serve the water supply needs of the development. This impact is considered potentially significant. Implementation of MM 4.15.1.1a and b and MM 4.15.1.2 would reduce these impacts to below a level of significance.

Stormwater and Drainage

As discussed above, stormwater and drainage facilities within the Project area are limited. Implementation of the proposed Project would require the development of a combination of storm drain piping, detention facilities, and IID drains to accommodate storm water from the Project area. The storm drain facilities, consisting of inlets and pipelines throughout the Project area, would be designed to handle general urban runoff of three inches of rain over the entire site within a 24-hour storm. The general urban runoff would be piped through the storm drain system, potentially into temporary detention facilities, and then into existing IID drains.

The detention basins would be required to drain all discharge into the IID drainage system within 72-hours of any given storm event; otherwise, implementation of mosquito abatement would be required. All storm drain systems would be designed to the standards of the County of Imperial and the California Regional Water Quality Control Board. Some detention basins would be landscaped for joint use as open space as well as water runoff storage. In addition, a landscaping plan for the detention basins would be approved by the County of Imperial. The IID drains, on the south and center locations of the Plan area, receives and transports storm water collected by the Project area's storm water piping and detention basin. Storm water runoff generated by the Project area would be connected at existing agricultural discharge locations via 12-inch pipes. However, the adjustment of a discharge location would need to be permitted and approval by IID. All storm

water discharge connections would need to comply with IID's "Water Requirements and Project Process." This impact is considered potentially significant. Implementation of mitigation measures 4.15.1.1a and b and 4.15.1.2 would reduce these impacts to below a level of significance.

The proposed TM 994 also proposes to place the Date Drain No. 3 and the Dogwood Lateral 2 underground/within a pipeline from McCabe Road to Correll Road. Additionally, a six-foot fence would be installed on either side of the IID right-of-way. The applicant also proposes to submit grading, drainage and fencing plans to IID Water Department Engineering Services for review and comment prior to final project design and Tract Map approval.

Electrical Service

The proposed TM 994 includes the installation of a new electrical substation on an approximately 2.25-acre lot located at the southwest corner of Farnsworth and McCabe Road (See Figure 3-5, Proposed Land Uses). Public utility easements (PUE) for ingress and egress of both transmission lines and distribution line along McCabe Road and Farnsworth Road along with the ultimate capacity of the substation and associated powerlines will be provided as part of the TM in coordination with IID.

IID's existing "PW" 92kV transmission line with a distribution (T-321 Circuit) 7.2/12.5kV underbuilt will be retained in place. The required horizontal, vertical distances and finish grades from the transmission line will be maintained; and IID's access to operate and maintain water and electrical facilities will be coordinated with IID.

Impacts associated with the installation of the proposed electrical substation and related facilities are addressed throughout this SEIR.

Impact 4.12-2: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Previously Identified Level of Significance

The Certified FEIR determined that the project would require the need for new water supplies to serve the water supply needs of the project. However, with mitigation incorporated, impacts were reduced to below a level of significance.

Proposed Project Impact Analysis

SB 610 requires developments such as the proposed project to include information on water supply availability at the time of project application. To meet this requirement, a water supply assessment (WSA) was conducted specifically for the proposed Project. The WSA found that the project's use of potable water would be less than that consumed by the agricultural uses active on the site under

the existing condition. The assessment also found that IID has an adequate water supply to support Imperial County's current and future nonagricultural growth for the next 20 years (WSA, 2025) (**Appendix F**).

If the project site were operating at its full potential as a fully functioning agricultural use, the project site is estimated to use approximately 948 AFY of water. The proposed Project has an estimated total construction water demand of 87.02 AF, or 4.35 AFY amortized over a 20-year term (for all delivery gates for Project). Once all phases have been completed the operational water demand would be 2.82 AF per day or 1,029.3 AFY. Thus, at full build out, the proposed Project demand is an increase of 81.3 AFY from the historical 10-year average annual delivery for agricultural uses at the proposed Project site. The WSA also found that adequate supply exists for the next 20 years. Pursuant to SB 221, a Written Verification of Water Availability letter has been prepared for the project.

McCabe Ranch II was included in the population projections for the 2017 HPUD SAP. The HPUD SAP (adopted on March 22, 2018), identifies the existing water and wastewater treatment facilities, the present capacity and demand, along with the future needs.

Table 4.12-4 provides the project's estimated water demand from the HPUD water system. The proposed project has a plan for water usage that represents a decrease in water usage from the land's historical use. However, the project would increase demand on HPUD's potable water system because the development would require treated water. The WSA shows that IID has adequate potable water to serve the proposed project and the County Imperial for the next 20 years (see Appendix F).

Impact 4.12-3: 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?

Previously Identified Level of Significance

The Certified FEIR determined that the Project would result in an increase in demand for sewer capacity and require extension of the existing wastewater system. However, with mitigation incorporated, these impacts were reduced to a less than significant level.

Proposed Project Impact Analysis

As discussed previously, the development of the proposed Project would result in an increase in total wastewater demand of 0.94 MGD (**Table 4.12-4**) which would exceed the remaining capacity, 0.6 MGD, of the WWTP. The proposed Project would result in the need for expansion of existing wastewater treatment facilities to serve the water supply needs of the project. This impact is considered potentially significant. Implementation of Mitigation Measure 4.15.1.1a and

Mitigation Measure 4.15.1.1b and Mitigation Measure 4.15.1.2 would reduce these impacts to below a level of significance.

Impact 4.12-4: 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?

Previously Identified Level of Significance

The Certified EIR determined that the estimated solid waste generated by the proposed Project would be within the permitted capacity of the landfill, and Palo Verde Disposal would provide waste pickup and disposal services to the proposed project, impacts to solid waste services are considered less than significant.

Proposed Project Impact Analysis

As with the Certified FEIR, the proposed Project would generate 2,300 residential units, 9.4-acres of business park, 3.1 acres of commercial uses, and 16.29 acres of institutional (school) use which would add to the county's total solid waste generation. At buildout, the residential component of the McCabe Ranch II TM 994 Project would generate approximately 4,316.9 tons of solid waste per year as illustrated in **Table 4.12-6.** The Non-residential components of the TM and the Specific Plan are estimated to generate around 1,658 tons of solid waste per year (see **Table 4.12-7**).

TABLE 4.12-6. ESTIMATED WASTE GENERATION – PROPOSED RESIDENTIAL USES

Housing Units	Generation Factor (lbs /Dwelling Unit/Day)*	Total Waste Generation (Tons Per Month)	Total Waste Generation (Tons/Year)
Single-Family DUs (1501)	11.4	256.7	3,080
Multiple-Family DUs (799)	8.6	103.1	1,236.9
Total		**359.8**	**4,316.9**

Notes: DUs = Dwelling Units (#) Denotes No. of Dwelling Units
Source: CalRecycle 2025.

TABLE 4.12-7. ESTIMATEDWASTE GENERATION – PROPOSED NON - RESIDENTIAL USES

Non-Residential Land Uses	Square Feet Waste Generation Factor	Waste Generation (pounds/tons per day)	Total Waste Generation (Tons/Year)
Commercial (3.1-acres)	2.5 lbs/1,000 sq. ft. / day	337.59/0.17	2.04
Business Park (9.4 acres)	6 lbs/1,000 sq. ft / day	2456.8/1.22	14.64
Institution (29.5 acres)	0.007 lbs/sq ft/ day	8,995/4/49	1,641
TOTAL			**1,657.68**

Notes: sq. ft/day = square foot per day (#) Denotes acres of non-residential uses.
Source: California Integrated Waste Management Board, 2010.

As previously discussed, waste generated from the proposed Project would be disposed of at Allied Imperial Landfill or at other landfills within the County. The Allied Imperial Landfill has available capacity remaining until 2051. While waste collection companies can decide to take solid waste to different landfills based on proximity, landfill tipping fees, daily permitted disposal limits, and other factors. CR&R can decide to deposit solid waste at any of the Class III landfills in the County; all landfills have sufficient capacity to accept municipal solid waste that would be generated by the proposed McCabe Ranch II TM and Specific Plan Amendment.

Expanded services would be funded through fees charged to customers for services. As the estimated solid waste generated by the proposed Project would be within the permitted capacity of the available landfills, and CR&R would provide waste pickup and disposal services to the proposed project, impacts to solid waste services are considered less than significant.

Impact 4.12-5: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The Applicant will continue to comply with federal, state and local statutes related to solid waste. No impacts would occur. No mitigation would be required.

4.12.7 Mitigation Measures

The following mitigation measures were identified in the Certified EIR for the McCabe Ranch II Specific Plan and would be implemented to reduced significant utility and service system impacts. These mitigation measures are provided in verbatim below.

4.12.7.1 Previously Approved Mitigation Measures Applicable to the Proposed Project

MM 4.15.1.1a Heber Public Utility District Fair Shair Contribution – Water Infrastructure

The McCabe Ranch II Specific Plan Area future developers shall go through a three-phase process with the HPUD that includes contributing fair-share payments for the infrastructure and a budgetary estimate of the total cost of the new infrastructure. The project applicant shall also work in coordination with the County of Imperial to build adequate water lines to connect with the HPUD lines or to convey the water demand from the project.

Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

MM 4.15.1.1b Installation of Public Improvements

The project conditions of approval will require that the developer build the identified public improvements no later than after issuance of 30% of the Certificates of Occupancy of each phase of the tract map. The County will not permit a “pushing back” of public improvements to a later

phase. Each of the phased final maps will include a certain amount of public improvements (to be determined by the County and the HPUD) which must be completely installed no later than at the 30% buildout of the phased final map. The Developer will be required to maintain the public improvement during the build-out phase and two years after the final Certificate of Occupancy has been issued. When the public improvements are turned over to the County or HPUD, the Developer will put up a one-year bond for 15% of the entire improvement cost for unforeseen maintenance issues.

Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

MM 4.15.1.2 Heber Public Utility District Fair Shair Contribution – Sewer Infrastructure

The McCabe Ranch II Specific Plan Area future developers shall go through a three-phase process with the HPUD that includes contributing fair-share payment for the infrastructure and a budgetary estimate of the total cost of the new infrastructure. The project applicant shall also work in coordination with the County of Imperial to build adequate water lines to connect with the HPUD lines or to convey the water demand from the project.

Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

MM 4.15.1.3 Proof of Service Agreements

For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall provide proof of agreement to service the project area with electrical service to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from the IID specifically stating their ability and willingness to serve the project site with electrical service. Any requirements contained in the agreement/letter shall be included as conditions of approval on all building permits issued for the proposed project. The applicant shall ensure any conditions of approval are carried out prior to project area buildout.

Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

MM 4.15.3.2 For future developments within the McCabe Ranch II Specific Plan Area, the Project Applicant shall provide proof of agreement to service the project area from SCGC to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from SCGC specifically stating their ability to serve the project site with natural gas service. Any requirements contained in the agreement/letter shall be

included as conditions of approval on all building permits issued for the proposed project. The applicant shall ensure any conditions of approval are carried out prior to project area buildout.

Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

MM 4.15.3.3 For future developments within the McCabe Ranch II Specific Plan Area, the project applicant shall provide proof of agreement to service the Project area from AT&T and Adelphia Cable, or current franchise provider, to the County of Imperial Planning and Development Services Department. Such proof shall consist of a service agreement or will-serve letter from each service provider specifically stating their ability to serve the project site with telephone and cable services, respectively. Any requirements contained in the agreements/letters shall be included as conditions of approval on all building permits issued for the proposed project. The Applicant shall ensure any conditions of approval are carried out prior to project area buildout.

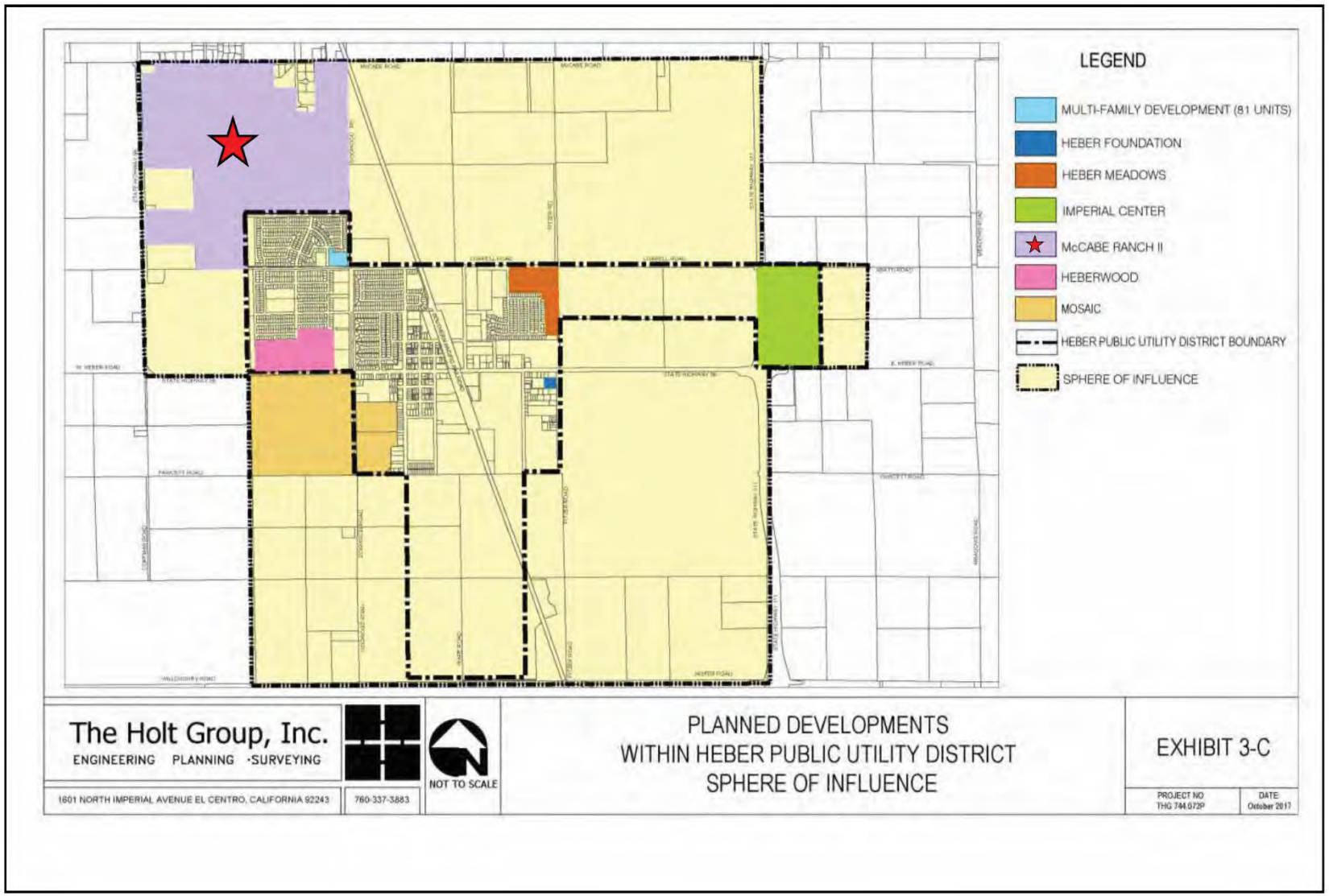
Timing/Implementation: *Prior to the issuance of the first occupancy permit.*

Enforcement/Monitoring: *ICPDSD.*

4.12.7.1 Previously Approved Mitigation Measures Applicable to the Proposed Project

4.12.8 Level of Significance After Mitigation

With mitigation incorporated, impacts would be reduced to below a level of significance.



Source: HPUD, 2018.

Heber Public Utilities District Boundaries & Developments
McCabe Ranch II TM 994 and SPA
Figure 4.12-1

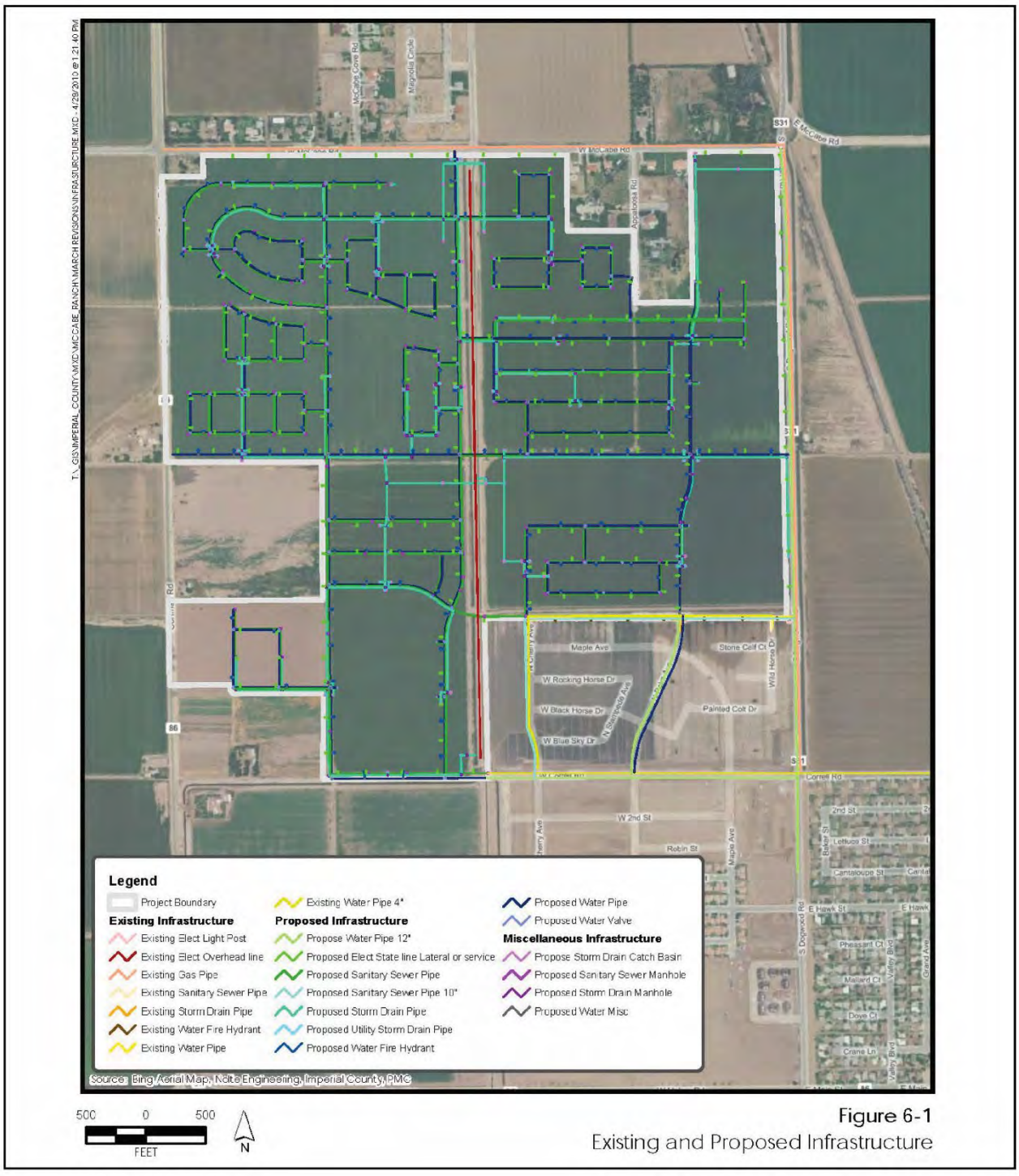


Figure 6-1
Existing and Proposed Infrastructure

Source: McCabe Ranch Realty, 2025.

Existing and Proposed Infrastructure
McCabe Ranch II TM 994 and SPA
Figure 4.12.2

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4.13. Project Consistency with the Certified EIR

The following sections discuss the consistency of the proposed McCabe Ranch II Tract Map (TM) 994 and Specific Plan Amendment (the proposed Project) with the Certified EIR for the resources that are not otherwise discussed in this SEIR. The analysis reflects the current criteria and thresholds in CEQA Guidelines Appendix G; lists the significance determination for each resource area identified in the Certified EIR; and determines whether further analysis is required or whether the analysis from the Certified EIR is sufficient.

Further analysis would be required if substantial evidence in the record presents new significant effects or if there is a substantial increase in the severity of significant effects disclosed in the prior EIR (Public Resources Code Section 21166; CEQA Guidelines Section 152162[a]). Further analysis would also be required if new analysis is required as a result of updates to the CEQA Guidelines since publication of the Certified EIR. This could be true, for example, if newly proposed activities would occur outside the boundary of an area previously analyzed or at a greater intensity than previously evaluated. By comparison, a prior EIR is sufficient where changes to a project, changes in circumstances, or new information of substantial importance would not result in a new significant effect or a substantial increase in the severity of a significant effect relative to the impacts disclosed in the prior EIR.

For this Project, changes are reflected in the proposed McCabe Ranch II TM 994, which update the McCabe Ranch II Specific Plan to reflect a change in the development phasing for the McCabe Ranch II Specific Plan Area (SPA) referred to in the Certified EIR. Chapter 2.0 of this Draft EIR, provides details on this. The County has determined, based on the detailed analysis in Sections 4.13.1 through 4.13.9 that no additional changes to the Certified EIR are needed to provide sufficient documentation of the environmental impacts to aesthetics, agricultural and forestry resources, cultural and paleontological resources, geology and soils, hazards and hazardous materials, hydrology/water quality, mineral resources, population and housing, and recreation.

4.13.1 Aesthetics

4.13.1.1. Summary of Certified EIR Analysis

Potential impacts to aesthetics and visual resources associated with development within the Project area were evaluated in Section 4.1 of the Certified EIR. The Certified EIR found that implementation of the proposed Project would not have a substantial adverse effect on scenic vistas. The Certified EIR found that the proposed Project was not likely to negatively affect the viewshed from surrounding areas due to the height restrictions of the proposed Project. Views of the Project site to passing motorists would be affected because of the relatively flat topography of the larger Project area, however, these impacts would be fleeting and less than significant. In addition, implementation of two Proposed Specific Plan Policies (Ae-1 and Ae-2) would serve as mitigation for impacts to the viewshed from surrounding areas by reviewing proposals for new residential developments with

for compatibility and establishing residential design standards for planned unit developments. The Certified EIR also found there would be no impact to scenic resources within a state scenic highway. No new scenic highways have been designated since the Certified EIR, thus, that impact is unchanged.

The Certified EIR also found the visual character of the SPA would be altered since the character is being changed from an agricultural landscape to a residential landscape with commercial uses. However, implementation of Specific Plan Policy Ae-3, which require the preparation and approval of conceptual landscape plans, would serve to reduce these impacts to less than significant.

The Certified EIR determined the proposed Project would result in new sources of daytime glare and that these impacts would be potentially significant. However, the implementation of Mitigation Measure 4.1.3, which minimizes the use of reflective materials in building design and requires all lighting and illumination to be shield, would reduce this impact to less than significant. Additionally, outdoor lighting systems shall be designed to meet the backlight, uplight, and glare ratings in accordance with CALGreen standards Title 24 Part 6 Table 5.106.8.

The Certified EIR also found that the proposed Project would add new sources of nighttime lighting and that these impacts would also be potentially significant. However, Specific Plan Policy Ae-4, which requires adherence to basic lighting principles, would reduce the potential amount of nighttime lighting to below a level of significance.

4.13.1.2. Proposed Project Impact Analysis

The project applicant, McCabe Ranch Realty, LLC, seeks to process a Subdivision Tract Map that would accommodate the phased development within a portion of the McCabe Ranch II SPA. The proposed Subdivision Tract Map 944 (TM 994) would require an amendment to the Specific Plan, but would not change the specific plan boundaries; general land uses; or development densities in comparison to the approved McCabe Ranch II Specific Plan (Specific Plan). Instead, it would modify the distribution of the residential and park uses, modify the lot layout and development phasing, which also modifies the Specific Plan's circulation element. These changes would require an amendment to the approved Specific Plan. Additionally, the project applicant proposes to annex the SPA into the Heber Public Utility District (HPUD) for the provision of water and wastewater service. In total, the proposed TM 994, Specific Plan Amendment these three (3) actions represent the proposed project (proposed Project or Project) in this SEIR.

4.13.1.3. General Plan Consistency

In 2015, the County established new Goals and Objectives in the Land Use Element (Imperial County 2015) of the County General Plan for the Regional Vision that involve aesthetics. Specifically:

Goal 3: Achieve balanced economic and residential growth while preserving the unique natural, scenic, and agricultural resources of Imperial County.

Objective 3.4: Protect/improve the aesthetics of Imperial County and its communities.

The proposed activities for the McCabe Ranch II Specific Plan would be consistent with the goals and objectives of the Regional Vision defined above. Additionally, the Certified EIR found that implementation of the McCabe Ranch II Specific Plan would be consistent with the County's "Specific Plan" land use designation for the area; future development consistent with the McCabe Ranch II Specific Plan would not result in significant impacts to aesthetics.

4.13.1.4. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

MM 4.1.3 Minimize the Use of Reflective Materials in Building Design

Subsequent development within the McCabe Ranch II SPA shall minimize the use of reflective materials in building design in order to reduce the potential impacts of daytime glare. In addition, all lighting and illumination, including signs, shall be shielded to minimize scatter. The County of Imperial Planning and Development Services Department (ICPDSD) shall review proposed building designs for use of reflective materials and recommend the removal of such materials.

Timing/Implementation: *Prior to issuance of building permits.*

Enforcement/Monitoring: *ICPDSD.*

4.13.1.4 Consistency Conclusions for Aesthetics

Since adoption of the Specific Plan in 2010, there have been no changes to the aesthetic environment or characteristics of the proposed Project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment would result in no new significant aesthetics impacts and no substantial increase in the severity of significant impacts to aesthetics disclosed in the Certified EIR.

4.13.2 Agriculture and Forestry Resources

4.13.2.1. Summary of Previous Certified EIR Analysis

Potential impacts to agricultural and forestry resources associated with development within the McCabe Ranch II SPA were evaluated in the Certified EIR. The Certified EIR found that implementation of the McCabe Ranch II Specific Plan would be consistent with the County's "Specific Plan" land use designation for the area. The Certified EIR also found that while future development would convert Prime Farmland and Farmland of Statewide Importance, because the McCabe Ranch II Specific Plan was consistent with the County's land use vision for the project

area, no significant agricultural conversion impacts would occur. Therefore, the conversion of existing agricultural uses was found to be less than significant, and no mitigation measures were required.

Since adoption of the Specific Plan in 2010, there have been no changes to the agricultural environment or characteristics of the McCabe Ranch SPA as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts relative to the impacts disclosed in the Certified EIR related to agriculture and forestry resources.

4.13.2.2. Proposed Project Impact Analysis

The proposed Project includes a Tract Map for a portion of the McCabe Ranch II SPA and an amendment to the Specific Plan. The TM 994 would be developed with uses that include residential, commercial, business park, schools and infrastructure improvements. According to the most recent California Department of Conservation Farmland Mapping for Imperial County (2020) the SPA contains Prime Farmland and Farmland of Statewide Importance, which would be converted to non-agricultural uses. The SPA contains no forestry resources. Because the Certified EIR found that implementation of the McCabe Ranch II Specific Plan would be consistent with the County's "Specific Plan" land use designation for the area; future development consistent with the McCabe Ranch II Specific Plan would not result in significant impacts to agricultural and forestry resources.

4.13.2.3. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

As no impact to agricultural and forestry resources would result from implementation of the McCabe Ranch II TM 994, no mitigation measures are required.

4.13.2.4. Consistency Conclusions for Agriculture and Forestry Resources

Since adoption of the Specific Plan in 2010, there have been no changes to the agricultural environment or characteristics of the proposed project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to agriculture and forestry resources disclosed in the Certified EIR.

4.13.3 Cultural and Paleontological Resources

4.13.3.1. Summary of Certified EIR Analysis

Potential impacts to cultural and paleontological resources associated with development within the McCabe Ranch II TM 994 Project area were evaluated in Section 4.5 of the Certified EIR. The

Certified EIR found that implementation of the McCabe Ranch II Specific Plan would be consistent with the County's "Specific Plan" land use designation for the area.

An archaeological and historical investigation was conducted in August 2008. These investigations included a records search by the Southeast Information Center at the Imperial Valley College Desert Museum in Ocotillo, a sacred lands search conducted by the Native American Heritage Commission (NAHC), consultation with the Native American community, archival research, and a pedestrian surface survey across the entire 457-acre Project site. No cultural resources were identified within the boundaries of the project site during the record search or the pedestrian survey.

Nevertheless, the Certified EIR found that implementation of the McCabe Ranch II Specific Plan project could result in potentially significant impacts to undiscovered prehistoric and historic resources and the inadvertent discovery of human remains during construction. Mitigation Measures 4.5.1a and 4.5.1b, which require proper notification of historic and prehistoric discoveries during project development, were adopted to reduce these impacts to below a level of significance.

The Certified EIR also found that construction activities associated with the McCabe Ranch II Specific Plan could result in significant impacts to undiscovered paleontological resources. Implementation of mitigation measure MM 4.5.2, which requires proper notification and mitigation for paleontological resources discovered during future project development of the Specific Plan area, would reduce the impacts to below a level of significance.

4.13.3.2. Proposed Project Impact Analysis

The proposed Project includes a TM for a portion of the McCabe Ranch II Specific Plan area which would be developed with land uses that include residential, commercial, business park, schools and infrastructure improvements. Since adoption of the Specific Plan in 2010, there have been no known changes to the cultural or paleontological resource environment or characteristics of the proposed Project area.

The proposed land uses and development densities that would be developed, as well as the areas that would be disturbed under the proposed McCabe Ranch II TM 994 and Specific Plan Amendment, would be similar to those identified in the Certified EIR. Therefore, the cultural and paleontological impacts of the proposed Project fall within the scope of the Certified EIR, and would be consistent with its findings and adopted mitigation measures. While the mitigation measures have been modified to reflect current mitigation practice, no substantially new mitigation measures would be required. ~~Strikeout~~/underline formatting is used to depict mitigation modifications.

4.13.3.3. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Mitigation measures MM 4.5.1a and MM 4.5.1b were identified in the Certified EIR for the McCabe Ranch II Specific Plan. These measures have been replaced by mitigation measures MM CUL-1 through MM CUL-6 which would be implemented to reduce significant impacts to tribal cultural resources. See Section 4.11 Tribal Cultural Resources for details.

MM 4.5.2 Discovery of Paleontological Resources

If any paleontological resources (i.e., fossils) are discovered during ground-disturbing project activity within the McCabe Ranch II SPA, all work in the immediate vicinity must stop and the project applicant shall notify the ICPDSD immediately. A qualified paleontologist shall be retained to evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered paleontological resources.

The County and the project applicant shall consider the mitigation recommendations of the qualified paleontologist for any unanticipated discoveries. The County and the project applicant shall consult and agree upon implementation of a measure or measures that the County and the project applicant deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The project proponent shall be required to implement any mitigation necessary for the protection of paleontological resources. ~~and b and 4.5.2, which require proper notification and mitigation for cultural and paleontological resources discovered during future project development within the Specific Plan area, were determined to reduce the impacts to below a level of significance. The text of Mitigation Measure 4.5.1a have been modified to reflect the County's standard mitigation requirements for cultural resource monitoring to be implemented during construction and preparation of data recovery plan. The specific modification language that will be added to Mitigation Measure 4.5.1a is provided below.~~

Timing/Implementation: *As a condition of project approval, and implemented during ground disturbing construction activities.*

Enforcement/Monitoring: *Imperial County Planning Department.*

4.13.3.4. Consistency Conclusions for Cultural Resources

Since adoption of the Specific Plan in 2010, there have been no changes to the cultural and paleontological resources environment or characteristics of the proposed project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II Specific Plan TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to cultural and paleontological resources disclosed in the Certified EIR.

4.13.4 Geology and Soils

4.13.4.1. Summary of Certified EIR Analysis

Potential impacts to geology and soils associated with development within the Project area were evaluated in Section 4.6 of the Certified EIR. The Certified EIR found that the SPA is located five (5) miles from the nearest mapped fault. No faults have been mapped as crossing the Project area and potential impacts are less than significant. Although the potential geology and soils impacts were found to be less than significant, mitigation measures were proposed to ensure impacts are further reduced. Mitigation Measure 4.6.1a requires preparation of a site-specific geotechnical investigation prior to the approval of improvement plans or issuance of grading permits. Mitigation Measure 4.6.1b requires all structures within the Project area to be compliant with the California Building Code (CBC).

The Certified EIR found the Project site is in a seismically active area and could be subject to strong seismic ground shaking in the event of an earthquake. The potential for lurching and shaking was considered high. The Certified EIR also found that soils underlying the project site are prone to liquefaction. Implementation of Mitigation Measure 4.6.1a and 4.6.1b would reduce all these impacts to below a level of significance.

The Certified EIR determined the proposed Project may result in an increase in soil erosion from wind and stormwater runoff and cause siltation into local drainages. However, implementation of Specific Plan Policy Geo-1 would minimize the degradation of water quality through erosion control plans and best management practices for stormwater.

The Certified EIR found that the project site may be located on an unstable geologic unit. However, implementation of Specific Plan Policies Geo-1 in combination with the Uniform Building Code (UBC) and the CBC, would reduce impacts associated with unstable geologic units to less than significant.

The Certified EIR found the Project site may be located on an unstable geologic unit; however, this impact would be considered less than significant. Implementation of Specific Plan Policy Geo1 which requires the preparation of erosion control plans and best management practices would reduce this impact further.

The Certified EIR found the Project site may contain expansive soils and this impact would be considered potentially significant. Implementation of Mitigation Measures 4.6.1a and b would reduce the potential effects resulting from expansive soils within the Project area to less than significant.

The Certified EIR found the Project site may contain potentially corrosive soils which could result in the instability of proposed project structures. Implementation of Mitigation Measure 4.6.7, which

requires a corrosion engineer to assist in the design of improvements in contact with soil, would reduce this impact to below a level of significance.

4.13.4.2. General Plan Consistency Analysis

In 2022, the County published an updated Seismic and Public Safety Element which enacted the following goals and policies that are applicable to the proposed Project.

Goal 1: Integrate public health and resilience into land use planning.

Policy 1.1 Incorporate data on areas with geological and seismic hazards into the land use review process and future development processes. As development is proposed, developers shall be required to provide information related to these hazards.

Policy 1.4 Require seismic risks be avoided, when feasible, and mitigation measures, commensurate with risks, be taken to reduce injury, loss of life, destruction of property, and disruption of service.

Policy 1.6 Ensure natural hazards are considered when siting critical facilities, as well as the extent to which the range, frequency, and intensity of environmental hazards may change due to climate change, as applicable.

Policy 1.8 Encourage the reclamation and management of lands where mining, irrigation, landfills, solid waste, hazardous materials/waste storage or disposal, and natural soil erosion has occurred, so as to pose no danger to public health and safety.

Policy 1.10 Restrict residential development on unsuitable lands, recognizing that prohibition or restriction of residential uses are in the public interest, health, and safety.

Goal 2: Avoid loss of life, injury, and property damage from seismic and geologic hazards.

Policy 2.1 Ensure that no structure for human occupancy, other than one-story wood-frame structures, shall be permitted within 50 feet of an active fault trace, as designated on maps compiled by the State Geologist under the Alquist-Priolo Geologist Hazards Zone Act.

Policy 2.2 Require new development in areas prone to geologic hazards (e.g., landslides, slope instability) to be adequately protected against these hazards. Any development in hillside areas shall prepare drainage plans to direct runoff and drainage away from potentially unstable slopes. New developments shall incorporate hillside design techniques and features to mitigate and support slope stability.

Policy 2.3 Require that geological and geotechnical investigations for new development proposals in areas with potential earthquake-induced liquefaction, landslides, or settlement.

To the extent feasible, the County will limit intensive development, and land uses along rivers and waterways where it is likely that erosion could cause property damage or threaten life during high-precipitation events.

Policy 2.4 Encourage building retrofits that improve resiliency to geologic and seismic hazards.

Policy 2.5 Participate in local and regional emergency preparedness planning efforts with public and quasi-public agencies (e.g., the Imperial County Sheriff's Office, the Imperial County Fire Department (ICFD), Caltrans District 11) to ensure the continued functionality of major utility services and roadways in the event of a major earthquake.

Policy 2.6 Implement development restrictions and seismic study requirements around active faults pursuant to the Alquist-Priolo Act to ensure that potential impacts of seismic hazards are mitigated.

Policy 2.7 Require suppliers of all existing utilities that cross active faults to file with the County an operation plan describing the probable effects of failures at the fault and the various emergency facilities and procedures that exist to ensure that failure does not threaten public safety.

Policy 2.8 Maintain an inventory of unreinforced masonry structures in compliance with California's Unreinforced Masonry Law.

Policy 2.9 Promote the development of groundwater recharge basins outside of areas with increased potential for liquefaction resulting from an earthquake.

Policy 2.10 Require that grading activities preserve natural features, including vegetation, terrain, watercourses, and similar resources, wherever feasible.

Policy 2.11 Reduce the risk of damage due to subsidence resulting from extraction of groundwater and geothermal resources by appropriate regulation.

The proposed activities for the McCabe Ranch II TM 994 and Specific Plan Amendment would be consistent with the applicable goals and policies of the Seismic and Public Safety Element noted above.

4.13.4.3. Proposed Project Impact Analysis

The proposed Project includes a TM for a portion of the McCabe Ranch II Specific Plan area which would be developed with land uses that include residential, commercial, business park, schools and infrastructure improvements. Since the Certified EIR, there have been no known changes to the geological environment or characteristics of the proposed Project area.

No changes in the location, size, or boundaries of the McCabe Ranch II Specific Plan area have occurred since adoption of the Specific Plan in 2010. The proposed Project would not result in changes to the location, size, or boundaries of the Specific Plan. Therefore, no new areas with potential earthquake faults have been introduced that were not previously analyzed in the Certified EIR.

The proposed Project includes a TM for development of a portion of the Project area with residential, recreation, parks and school uses. Development of the proposed uses could result in the Project being constructed in a seismically active area and be subject to strong ground shaking as well as be located on expansive and corrosive soils on a geologically unstable unit and also be subject to soil erosion. However, implementation of Mitigation Measures 4.6.1a and b, 4.6.7 and Specific Plan Policy Geo-1 would reduce substantial direct or indirect risks to life or property to below a level of significance.

The Project would obtain wastewater treatment services from the Heber Public Utilities District (HPUD). No septic tanks or alternative wastewater disposal systems or the disposal of wastewater are included in the Project. For these reasons, no impact would occur under these criteria.

The proposed Project includes annexing the SPA into the Heber Public Utilities District to

Potential impacts on paleontological resources were evaluated in Section 4.13.3 of the Certified EIR. As discussed previously, implementation of Mitigation Measure 4.5.2b would reduce potential effects to below a level of significance.

4.13.4.4. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

MM 4.6.1a Site Specific Geotechnical Investigation

Prior to approval of improvement plans or issuance of grading permits, a site-specific geotechnical investigation shall be performed, including subsurface exploration and laboratory testing. The subsurface evaluation shall evaluate the subsurface conditions at specific locations based on the development proposed and shall provide information pertaining to the engineering characteristics of earth materials at the project site, including potential for liquefaction and expansive soils. A geotechnical design report shall be prepared based on this data presenting recommendations pertaining to geotechnical aspects of the design and construction of the proposed improvements.

Undocumented fill soils, if present, shall be removed and/or replaced as engineered compacted fill. Permanent structures shall be designed appropriately to mitigate strong ground shaking or liquefaction in the event of an earthquake on a nearby fault. Mitigation may include design measures that include selective grading and densification of the subsurface soils, and/or deep foundations to reduce potential impacts associated with liquefaction to a less than significant level. Potential mitigation measures for expansive soils may include removal or deep burial during grading,

moisture conditioning, or specially designed foundations on slabs. Recommendations of the investigation shall be incorporated as mitigation and as conditions of project approval.

Timing/Implementation: *Prior to approval of improvement plans or issuance of grading permits, whichever occurs first/Implemented during construction.*

Enforcement/Monitoring: *Imperial County Department of Public Works/ICPDSD.*

MM 4.6.1b Building Code Compliance

All structures constructed within the McCabe Ranch II SPA shall comply with the California Building Code, as adopted for use within the County.

Timing/Implementation: *Confirmation will occur through approval of improvement plans or issuance of grading permits, whichever occurs first/Implemented.*

Enforcement/Monitoring: *During construction. Imperial County Department of Public Works/ICPDSD.*

Specific Plan Policy Geo-1

Minimize the degradation of water quality through use of erosion control plans and best management practices.

Timing/Implementation: *Prior to approval of improvement plans or issuance of grading permits, whichever occurs first/Implemented during construction.*

Enforcement/Monitoring: *Imperial County Department of Public Works/ICPDSD.*

4.13.4.5. Consistency Conclusions for Geology and Soils

Since adoption of the Specific Plan in 2010, there have been no changes to the geology and soil resource environment or characteristics of the proposed Project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment would result in no new significant impacts and no substantial increase in the severity of significant impacts to geology and soils resources disclosed in the Certified EIR.

4.13.5 Hazards and Hazardous Materials

4.13.5.1. Summary of Certified EIR Analysis

Potential impacts to hazards and hazardous materials associated with development within the Project area were evaluated in Section the Certified EIR. The Certified EIR found that the proposed Project may result in the limited use, transportation, and storage of hazardous materials during both the construction and operational phases. This impact would be considered potentially significant.

However, implementation of mitigation measure MM 4.7.1, which requires the preparation and implementation of a site and community health and safety plan prior to the start of construction, would reduce these impacts to below a level of significance. The Certified EIR also found the proposed Project would not result in the emission of hazardous materials near a school site since there would be no hazardous emissions or odor because of the proposed Project. Impacts would be less than significant.

The Certified EIR found that due to the current and historical use of the Project site for agricultural practices the potential exists for residual pesticides, herbicides, and/or heavy metals to be present within soils and/or groundwater on the site. Additionally, it is possible there may have been an unauthorized release of unleaded gasoline from an adjacent property that could have impacted soils and/or groundwater on the Project site. Thus, impacts would be considered potentially significant. However, implementation of Mitigation Measure 4.7.3a and 4.7.3b which (a) requires development of a soil and groundwater management plan to address the potential for localized areas of potential environmental hazards; and (b) requires that sampling be conducted in the event contaminated soil or groundwater is found. This would reduce the impact to below a level of significance.

The Certified EIR found that the closest private airstrip is approximately 2.5 miles from the Project site. The Douthitt Strip airport was used by crop dusting planes which dust crops in the vicinity of the Project site. Crop dusting activities are heavily regulated by the County, however, since the McCabe Ranch II Specific Plan would introduce urban uses into an agricultural environment, the impacts were considered to be potentially significant. Implementation of Mitigation Measure 4.7.4, which requires development of a protocol that is acceptable to the Imperial County Agricultural Commissioner for outdoor activities within the SPA following application of pesticides, etc. on surrounding agricultural lands, would reduce impacts to below a level of significance.

The Certified EIR found that the proposed Project would create 2,300 new residential units as well as commercial and recreational areas. These uses would increase demand for emergency services in an area that was previously used for agricultural operations which could interfere with an adopted emergency response plan. These impacts would be considered potentially significant. However, implementation of Mitigation Measure 4.7.5 would require applicants to coordinate with the ICFD to ensure the Project is consistent with the County's Emergency Operations Plan which would reduce the impacts to below a level of significance.

The Certified EIR determined the Project site is in a developing portion of the county. Development exists to the north and south of the site, but the eastern and western portions of the site currently abut undeveloped agricultural fields. Wildland fire is typically associated with areas covered with woodland, grass, or otherwise heavily vegetated. None of these features characterize the area surrounding the project site. Therefore, the threat of wildland fire is considered less than significant.

4.13.5.2. Proposed Project Impact Analysis

The proposed Project includes a TM for a portion of the McCabe Ranch II SPA which would be developed with land uses that include residential, commercial, business park, schools and infrastructure improvements. Since adoption of the Specific Plan in 2010, Federal Aviation Administration (FAA) records indicate that the Douthitt Strip airport, which historically had been used for crop dusting within the SPA, was permanently closed, though no closure date is provided. Crop dusting operations continue within agricultural areas in other parts of the County, with planes departing from the Imperial County Airport and/or the Brawley Municipal Airport. For this reason, crop dusting is still presumed to occur within the SPA and in the surrounding areas. Thus, since the publication of the Certified EIR, there have been no known changes to the hazards and hazardous materials environment or characteristics of the proposed Project area.

The proposed land uses and development densities that would be developed as well as the areas that would be disturbed under the proposed McCabe Ranch II TM 994 and Specific Plan Amendment would be similar to those identified in the Certified EIR. Therefore, the hazards and hazardous materials impacts of the Project fall within the scope of and would be consistent with the findings and mitigation measures presented in the Certified EIR.

4.13.5.3. General Plan Consistency Analysis

In 2022 the County published an updated Seismic and Public Safety Element which enacted new goals and policies related to fire hazards. Specifically:

According to CalFire's 2023 Fire Hazard Severity Zones in the State Responsibility Area's map [(1)], the McCabe Ranch Specific Plan area and surrounding vicinity are not located on lands in or near state responsibility areas nor on lands classified as very high fire hazard severity zones (CalFire, 2024)

The Project site is not located within an area designated as a fire hazard area. The McCabe Ranch II Specific Plan TM 994 would be consistent with the Goals and Policies discussed above.

4.13.5.4. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

MM 4.7.1 Site and Community Health and Safety Plan

For future developments within the McCabe Ranch II Specific Plan Area, project applicant(s) shall prepare and implement a site and community health and safety plan prior to initiation of construction activities to reduce potential health and safety hazards to works and the public.

[1] Effective April 1, 2024.

Timing/Implementation: *Prior to issuance of grading permit/Implemented during construction.*

Enforcement/Monitoring: *County of Imperial, Planning and Development Services.*

MM 4.7.3a Environmental Hazards Contingency Plan

Mitigation Measure 4.7.3a would be amended as shown below to include the collection and testing of near-surface soils for the presence of pesticides in concentrations that exceed the USEPA Region 9 Regional Screening Goals for residential soil and groundwater protection.

For future developments within the McCabe Ranch II Specific Plan Area, prior to the issuance of a grading permit, project applicant(s) shall be required to collect and test near-surface soils for the presence of pesticides in concentrations that exceed the USEPA Region 9 Regional Screening Goals (RSL) for residential soil and groundwater protection. The number and location of samples shall be identified by a qualified environmental professional as defined in Section 3.1.2.10 of 40 CFR, Part 312.

If such testing identifies the presence of pesticides at concentrations exceeding their respective project action levels (PALs), a soil remediation plan (SRP) shall be prepared which identifies the specific contaminants of concern, the remedial action objective (RAO) and project action levels for pesticides to meet the RAO. ~~prepare a contingency plan (e.g., a soil and groundwater management plan) to address the possibility of encountering localized areas of potential environmental hazards. The plan shall include contractor procedures for such an event to minimize the potential for costly construction delays.~~ The SRP shall ~~monitoring of excavated~~ outline the soil remediation procedures, public notification requirements, community and worker health and safety, and soil handling, stockpiling, onsite reuse, export, and disposal protocols. Appropriate references to the potential to encounter contaminated soils and/or groundwater shall be included in the Project's grading plans and construction specifications to the satisfaction of the ICPDSD.

Timing/Implementation: *Prior to issuance of grading permit/Implemented during construction.*

Enforcement/Monitoring: *ICPDSD and the Imperial County Public Health Department, Section of Environmental Health & Consumer Protection Services*

MM 4.7.3b Discovery of Contaminated Soils

Should evidence of suspect contaminated soil or groundwater be encountered during excavation or other subsurface disturbance activities proposed for the site (e.g., discolored soil, odors), work shall be discontinued, appropriate health and safety procedures shall be implemented, and sampling shall be conducted to evaluate whether contamination is present. Appropriate regulatory agency notifications shall be made regarding the discovery of contamination. Additional environmental

investigation (e.g., health risk assessment) and/or mitigation may be required by regulatory agencies, particularly if there is the potential to affect public health, safety, and/or the environment.

Timing/Implementation: *Prior to issuance of grading permit/Implemented during construction.*

Enforcement/Monitoring: *County of Imperial, Planning and Development Services and the Imperial County Public Health Department, Section of Environmental Health & Consumer Protection Services*

MM 4.7.4 Pesticide Protocol

For future developments within the McCabe Ranch II Specific Plan Area, project applicant(s) shall develop a protocol that is acceptable to the Imperial County Agricultural Commissioner for outdoor activities within the project site following application of pesticides, etc. on surrounding agricultural lands. The protocol shall take into consideration neighboring agricultural operations and include notification of residents by the Imperial County Agricultural Commissioner at least 48 hours prior to aerial spraying. Parks, open space, and recreational fields shall not be used until the time specified by individual re-entry interval (REI) for the pesticide has elapsed following aerial spraying. The protocol shall require "caution" or "warning" postings, if applicable based on the type of pesticide used, and adherence to REI requirements prior to allowing use of the outdoor fields, recreational areas, and school sites following aerial spraying.

MM 4.7.5 Consult with Imperial County Fire Department

For future developments within the McCabe Ranch II Specific Plan Area, project applicant(s) shall coordinate with the ICFD to ensure that the project is consistent with the Emergency Operations Plan. Any revisions to circulation or access to the site which would facilitate emergency response activities, including evacuation routes, shall be made by the project applicant(s) prior to approval of development plans.

Timing/Implementation: *Prior to issuance of occupancy permits/ ongoing.*

Enforcement/Monitoring: *Project applicant and Imperial County Agricultural Commissioner.*

4.13.5.5. Consistency Conclusions for Hazard and Hazardous Materials

Since adoption of the Specific Plan in 2010, there have been no changes to the hazards and hazardous materials environment or characteristics of the proposed Project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II Specific Plan TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to hazards and hazardous materials resources disclosed in the Certified EIR.

4.13.6 Hydrology/Water Quality

4.13.6.1. Summary of Certified EIR Analysis

Potential impacts to hydrology and water quality associated with development within the Project area were evaluated in Section 4.8 of the Certified EIR. The Certified EIR found that buildout of the proposed Project could result in soil disturbance associated with construction activities resulting in accelerated erosion and sedimentation or the release of other pollutants to local waterways. This impact would be potentially significant. However, implementation of mitigation measure MM 4.8.1, which would require preparation of a stormwater pollution prevention plan (SWPPP), would reduce impacts to below a level of significance.

The Certified EIR found that the Project area would introduce impervious surfaces and structures to the Project site, resulting in increased runoff and additional pollutants which would substantially degrade water quality. These impacts would be considered potentially significant. However, implementation of Mitigation Measure 4.8.2, which would require development of water quality treatment facilities for removal of pollutants of concern, would reduce these impacts to below a level of significance.

The Certified EIR found that buildout of the proposed Project would result in an increase in impervious surface area that could result in alteration of existing onsite drainage patterns and contributions to substantial runoff exceeding existing stormwater capacity. This impact would be considered less than significant. Implementation of Mitigation Measure 4.8.1 and 4.8.2 would also further reduce this impact to below a level of significance.

The Certified EIR found that conversion of the Project site from agricultural to residential, open space/parks, commercial uses, and educational uses may cause groundwater levels to fluctuate and could affect recharge. However, these impacts would be less than significant.

4.13.6.2. Regulatory Framework

County of Imperial Land Use Ordinance, Title 9

The County's Ordinance Code provides specific direction for the protection of water resources and for the minimization of losses due to flood conditions. Applicable ordinance requirements are summarized below and are contained in Division 10, Building, Sewer, and Grading Regulations, and Division 16 - Flood Damage Prevention Regulations.

Chapter 10 – Grading Regulations. Section 91010.02 of the Ordinance Code outlines conditions required for issuance of a Grading Permit. These specific conditions include:

1. If the proposed grading, excavation or earthwork construction is of irrigatable land, that said grading will not cause said land to be unfit for agricultural use.

2. The depth of the grading, excavation or earthwork construction will not preclude the use of drain tiles in irrigated lands.

3. The grading, excavation or earthwork construction will not extend below the water table of the immediate area.

4. Where the transition between the grading plane and adjacent ground has a slope less than the ratio of 1.5 feet on the horizontal plane to 1 foot on the vertical plane, the plans and specifications will provide for adequate safety precautions.

Imperial County Engineering Guidelines Manual

Based on the guidance contained in the County's Engineering Guidelines Manual, the following drainage requirements are applicable to all developments within the County, including those within the McCabe Ranch II SPA.

III A. GENERAL REQUIREMENTS

1. All drainage design and requirements are recommended to be in accordance with the IID "Draft" Hydrology Manual or other recognized source with approval by the County Engineer and based on full development of upstream tributary basins. Another source is the Caltrans I-D-F curves for the Imperial Valley.

2. Public drainage facilities shall be designed to carry the 10-year, 6-hour storm underground, the 25-year storm between the top of curbs provided two 12-foot minimum width dry lanes exist and the 100-year frequency storm between the right-of-way lines with at least one 12-foot minimum dry lane open to traffic. All culverts shall be designed to accommodate the flow from a 100-year frequency storm.

3. Permanent drainage facilities and right-of-way (ROW), including access, shall be provided from development to point of satisfactory disposal.

4. Retention volume on retention or detention basins should have a total volume capacity for a 3-inch minimum precipitation covering the entire site with no C reduction factors. Volume can be considered by a combination of basin size and volume considered within parking and/or landscaping areas. There is no guarantee that a detention basin outletting to an IID facility or other storm drain system will not back up should the facility be full and unable to accept the project runoff. This provides the safety factor from flooding by ensuring each development can handle a minimum 3-inch precipitation over the project site.

5. Retention basins should empty within 72 hours and no sooner than 24 hours in order to provide mosquito abatement. Draining, evaporation or infiltration, or any combination thereof can accomplish this. If this is not possible then the owner should be made aware of

a potential need to address mosquito abatement to the satisfaction of the Imperial County Public Health Department. Additionally, if it is not possible to empty the basin within 72 hours, the basin should be designed for 5 inches, not 3 inches as mentioned in Item #4 above. This would allow for a saturation condition of the soil because of a 5-inch storm track. EHS must review and approve all retention basin designs prior to Imperial County Department of Public Works (DPW) approval. Nuisance water must not be allowed to accumulate in retention basins. The Imperial County Public Health Department may require a nuisance water abatement plan if this occurs.

6. The minimum finish floor elevation shall be 12 inches above top of fronting street curb unless property is below street level and/or 6 inches above the 100-year frequency storm event or storm track. A local engineering practice is to use a 5-inch precipitation event as a storm track in the absence of detailed flood information. The 100-year frequency storm would be required for detention calculations.

7. Finish pad elevations should be indicated on the plans, which are at or above the 100-year frequency flood elevation identified by the engineer for the parcel. Finish floor elevations should be set at least 6 inches above the 100-year flood elevation.

8. The developer shall submit a drainage study and specifications for improvements of all drainage easements, culverts, drainage structures, and drainage channels to the DPW for approval. Unless specifically waived herein, required plans and specifications shall provide a drainage system capable of handling and disposing of all surface waters originating within the subdivision and all surface waters that may flow onto the subdivision from adjacent lands. Said drainage system shall include any easements and structures required by the DPW or the affected Utility Agency to properly handle the drainage on site and off site. The report should detail any vegetation and trash/debris removal, as well as address any standing water.

9. Hydrology and hydraulic calculations for determining the storm system design shall be provided to the satisfaction of the Director, DPW. When appropriate, water surface profiles and adequate field survey cross-section data may also be required.

10. An airtight or screened oil/water separator or equivalent is required prior to permitting on-site lot drainage from entering any street right of way or public storm drain system for all industrial/commercial or multi residential uses. A maximum 6-inch drain lateral can be used to tie into existing adjacent street curb inlets with some exceptions. Approval from the DPW is required.

11. The County is implementing a storm water quality program as required by the SWRCB, which may modify or add to the requirements and guidelines presented elsewhere in this document. This can include ongoing monitoring of water quality of storm drain runoff, implementation of BMPs to reduce storm water quality impacts downstream or along

adjacent properties. Attention is directed to the need to reduce any potential of vectors, mosquitoes, or standing water.

12. A Drainage Report is required for all developments in the County. It shall include a project description, project setting including discussions of existing and proposed conditions, any drainage issues related to the site, summary of the findings or conclusions, off-site hydrology, onsite hydrology, hydraulic calculations and a hydrology map.

4.13.6.3. Proposed Project Impact Analysis

The proposed Project includes a TM for a portion of the McCabe Ranch II SPA which would be developed with land uses that include residential, commercial, business park, schools and infrastructure improvements. Since adoption of the Specific Plan in 2010, there have been no known changes to the hydrology and water quality environment or characteristics of the proposed Project area.

The SPA is not located within a flood hazard zone. Similarly, it is not located within an area subject to tsunamis or seiches. For these reasons, no impacts to water quality associated with the release of pollutants due to Project inundation are anticipated.

The SPA is located within the Imperial Valley Groundwater Basin, as defined by the California Department of Water Resources. The Imperial Valley Groundwater Basin is within the planning area for Imperial Irrigation District (IID's) Integrated Water Resources Management Plan (IWRMP) (IID, 2012). In November 2012, the Imperial County Board of Supervisors adopted the IRWMP, and in December 2012, the City of Imperial City Council and the IID Board adopted the plan. Adoption by IID, the County and the City of Imperial meets the basic requirement of the California Department of Water Resources for an IRWMP. The Water Forum authorized the City of Imperial to serve as the Proposition 84 grant administrator. Until the IID board selects and implements such capital development projects, IID provides water to new non-agricultural projects under the terms of the Equitable Distribution Plan and the Interim Water Supply Policy (IWSP) for Non-Agricultural Projects which is incorporated into the 2012 Imperial IRWMP by reference.

The IWSP designates up to 25,000-acre feet per year (AFY) of IID's annual Colorado River water supply for new non-agricultural projects, provides a mechanism and process to develop a water supply agreement for any appropriately permitted project, and establishes a framework and set of fees to ensure the supplies used to meet new demands do not adversely affect existing users by funding water conservation or augmentation projects as needed. As of January 2025, a balance of 18,620 AFY remains available under the IWSP for new non-agricultural projects, providing a mechanism for the development of reasonably sufficient water supplies for such projects. IID delivers untreated Colorado River water to the proposed Project site for agricultural uses through the following gates and laterals. The 10-year record for 2015-2024 of water delivery accounting is 948 AFY on average. The Project construction water demand of approximately 87.02 AF or 4.35

AFY amortized over a 20-year term (for all delivery gates for Project) represents 0.005% of the unallocated supply set aside in the IWSP for non-agricultural project, and approximately 0.02% of forecasted future non-agricultural water demands planned in the Imperial IRWMP through 2055. Once all phases have been completed the operational water demand would be 2.82 AF per day which equates to 1,029.3 AFY. Thus, the anticipated demand for the proposed McCabe Ranch II TM 994 and Specific Plan Amendment would result in an increase of 81.3 AFY from the historical 10-year average annual delivery for agricultural uses at the proposed Project site. For all the reasons described herein, the amount of water available and the stability of the IID water supply along with on-farm and system efficiency conservation and other measures being undertaken by IID and its customers ensure that the Project water needs will be met for the next 30 years as assessed for compliance under Senate Bill-610. Impacts would be less than significant and no mitigation would be required.

4.13.6.4. General Plan Consistency Analysis

In 2016 the County published an updated Conservation and Open Space Element which enacted new goals and policies related to water resources that are applicable to the proposed Project.

Goals 6: The County will conserve, protect, and enhance water resources in the County.

> Objective 6.1: Ensure the use and protection of all the rivers, waterways, and groundwater sources in the County for use by future generations.
>
> Objective 6.2: Ensure proper drainage and provide accommodation for storm runoff from urban and other developed areas in manners compatible with requirements to provide necessary agricultural drainage.
>
> Objective 6.3: Protect and improve water quality and quantity for all water bodies in Imperial County.
>
> Objective 6.4: Eliminate potential surface and groundwater pollution through regulations as well as educational programs.
>
> Objective 6.8: Discourage the use of hazardous materials in areas of the County where significant water pollution could pose hazards to humans or biological resources.
>
> Objective 6.9: Identify and protect watersheds and key recharge areas for the protection of water quality and groundwater.
>
> Objective 6.10: Encourage water conservation and efficient water use among municipal and industrial water users, as well as reclamation and reuse of wastewater.

Objective 6.11: Coordinate with the appropriate agencies for the availability of water to meet future domestic, industrial/commercial and agricultural needs.

Mitigation measures MM 4.8.1, MM 4.8.2 and MM 4.8.2b from the Certified EIR would ensure the McCabe Ranch II Specific Plan TM 994 would be consistent with the Goals and Policies discussed above.

4.13.6.5. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

MM 4.8.1 Prepare Stormwater Pollution and Prevention Plan

For future developments within the McCabe Ranch II SPA, project applicant(s) shall prepare a stormwater pollution and prevention plan (SWPPP) to be administered through all phases of grading and project construction. The SWPPP must incorporate best management practices (BMPs) meeting technical standards of the General Construction permit to ensure that potential water quality impacts (including onsite and offsite erosion) during construction phases are minimized and that a violation of water quality standards does not occur. The SWPPP must address spill prevention and include a countermeasure plan describing measures to ensure proper collection and disposal of all pollutants handled or produced on the site during construction, including sanitary wastes, cement, and petroleum products. BMPs included in the SWPPP must be consistent with the California Stormwater Best Management Practices Handbook for Construction. The SWPPP must be submitted to the Colorado RWQCB, Region 7 and to the County for review prior to the issuance of grading permits.

Timing/Implementation: *Prior to issuance of grading permits.*

Enforcement/Monitoring: *Project applicant and RWQCB.*

MM 4.8.2a Stormwater Collection

For future developments within the McCabe Ranch II Specific Plan Area, stormwater drainage from onsite impervious surfaces (including roads) shall be collected and routed through specifically designed water quality treatment facilities (BMPs) for removal of pollutants of concern (e.g., sediment, oil/grease), as approved by the ICPDSDS. As part of the Improvement Plans, the applicant shall verify that proposed stormwater retention basins are appropriate to treat the pollutants of concern from this project. BMPs are well- documented sources of mosquito breeding and pose a difficult mosquito problem. The contemplated BMPs shall also be reviewed for decreased mosquito habitat. The Master developer shall consider the cost of treatment and provide funding for comprehensive Mosquito Abatement Plan.

Timing/Implementation: *Prior to issuance of grading permits.*

Enforcement/Monitoring: *Project applicant and ICPDSD.*

MM 4.8.2b Construction Specifications.

Future water quality treatment facilities and Mosquito Abatement Plans prepared for the Project shall include the following features:

- The detention pond by design must drain all standing water within 3 days of a significant storm event. Our warm climate allows mosquitoes to emerge within a few days. Projects that cannot be designed to meet this standard must assume that mosquito breeding will occur. Proof of long-term contracting with a licensed pest control company for mosquito surveillance and abatement shall be supplied to the Imperial County Environmental Health Department. Maintenance districts or other sources of funding should provide for the additional costs associated with mosquito control.
- The Public Works Engineering Design Guidelines Manual requires that basins which do not process 3" rain within 72 hours must be built to accommodate a 5" event. In general, increasing the surface area, rather than depth, would provide quicker evaporation and infiltration.
- Adequate service to the basin must be provided. An easily-accessible perimeter road should be included around any basins. Assuming access by private vehicles will be prohibited, keys must be provided for gates or other barriers to authorized personnel.
- If stormwater basins are designed to receive day- to-day nuisance water from car washing, landscape irrigation, and other activities, some conveyance or drain system should be designed to prevent it from pooling or spreading over the surface of the basin. Dry basins prevent excess growth of vegetation and marsh-like conditions which promote mosquitoes.
- The project developer and subsequent CFD shall be responsible for clearing the basins of trash regularly and shall coordinate a clearing schedule satisfactory to the County of Imperial. During all phases of the project standing water must not be allowed to accumulate at the ends of temporary cul-de-sacs.
- Drain systems that lead to the basin should be designed to flow with gravity.
- Subsequent project builders shall design gutters such that designed gutters they flow and do not pool before reaching the street drain, thus lawn clippings, leaves and trash will not accumulate in such pools where mosquitoes breed.
- Ensure that all basins and water projects are properly plumbed and have pumps where necessary.
- Ensure that adequate soil testing is conducted with regard to infiltration rates.
- Consider using xeriscaping and other water conservation measures that will reduce the likelihood of nuisance water problems.

Timing/Implementation: Prior to issuance of grading permits.

Enforcement/Monitoring: Project applicant and ICPDSD.

Mitigation measure MM HWQ-1, has been added, which reflects the County's Engineering Guidelines Manual requirement for a drainage and sediment control plan.

MM HWQ-1 Comprehensive Drainage and Sedimentation Control Plan

A Comprehensive Drainage and Sedimentation Plan (Plan) shall be prepared for all future development activities under the McCabe Ranch II SP, prior to the initiation of construction prior to the issuance of a grading and/or building permit. Detailed hydrologic analysis shall be performed prior to final design. Results of these analyses will be submitted to the County for review. All proposed grading and impervious surfaces on site shall be reviewed and approved by the County with respect to its potential to cause or result in additional erosion and sedimentation, increased stormwater flows, or altered drainage patterns that could lead to unintentional ponding or flooding on site or downstream, and/or additional erosion and sedimentation. The Plan shall include, but not be limited to, the following measures:

- Construction of access corridors and temporary and permanent access roads shall not block existing drainage channels and shall not significantly alter the existing topography.
- The project proponent shall delineate the active drainage channels and avoid placement of proposed flood protection berms within active drainage channels. The drainage avoidance areas shall protect no less than 90 percent of the area of the active drainage channels from construction impacts.
- A hydraulic analyses shall be prepared for each future development activity that estimates the pre- and post- development peak discharges, water depths, and velocities for both smaller, more frequent events (2-, 5-, and 10-year events), as well as larger design storm events (100-year event) that would flow through each future project site, drainage avoidance area, and/or on either side of each proposed flood protection berm.
- The County shall be provided design details for the flood protection berms including subgrade preparation, construction methods, and armoring or scour protection.

Timing/Implementation: Prior to building and/or grading permit issuance for all construction.

Enforcement/Monitoring: ICPDSD.

4.13.6.6. Consistency Conclusions for Hydrology and Water Quality

Since adoption of the Specific Plan in 2010, there have been no changes to the hydrology and water quality environment or characteristics of the proposed Project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment would result in no new significant impacts and no substantial

increase in the severity of significant impacts to hydrology and water quality disclosed in the Certified EIR.

4.13.7 Mineral Resources

4.13.7.1. Summary of Certified EIR Analysis

Because the SPA supported agricultural uses, the Certified EIR found that no mineral resources were expected to occur within the area and thus did not include a detailed discussion of potential impacts.

Since adoption of the Specific Plan in 2010, there have been no changes to the mineral resources or characteristics of the Project area as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the proposed Project would result in no new significant impacts and no substantial increase in the severity of significant impacts relative to the impacts disclosed in the Certified EIR related to mineral resources.

4.13.7.2. Proposed Project Impact Analysis

The proposed Project includes a Tract Map for development of a portion of the McCabe Ranch II Specific Plan area and an amendment to the Specific Plan. The specific land uses that would be developed include residential uses, commercial and a business park uses, schools, parks and infrastructure improvements. According to Figure 8 of the County of Imperial's Conservation and Open Space Element (Existing Mineral Resources Map), the Project area does not contain any mineral resources of note.

Because the Project area does not contain mineral resources, implementation would not affect significant economic mineral resources. Thus, the future development of the McCabe Ranch II TM 994 and Specific Plan Amendment McCabe Ranch II Specific Plan would not result in significant impacts to mineral resources.

4.13.7.3. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

As no impact to mineral resources would result from implementation of the McCabe Ranch II TM 9994, no mitigation measures are required.

4.13.7.4. Consistency Conclusions for Mineral Resources

Since adoption of the Specific Plan in 2010, there have been no changes to the mineral resources or characteristics of the Project area as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to mineral resources disclosed in the Certified EIR.

4.13.8 Population and Housing

4.13.8.1. Summary of Certified EIR Analysis

Induce Substantial Population Growth

Potential impacts to population and housing associated with development within the Project area were evaluated in Section 4.11 of the Certified EIR. The Certified EIR found that implementation of the original McCabe Ranch II Specific Plan would be consistent with the "Specific Plan" land use designation of the County General Plan (Imperial County, 2008). In other words, the Specific Plan was found to be consistent with the objectives and policies set forth in the Land Use Element and therefore would be consistent with the growth anticipated in the Imperial County General Plan. While the Certified EIR found that implementation of the Specific Plan would add 2,300 new residential units to the area and result in the addition of 7,659 [(2)] new County residents, the Specific Plan would not induce substantial population growth beyond that projected in the General Plan. This impact would not be significant and no mitigation measures would be required.

Displace Substantial Number of Persons or Existing Housing

The McCabe Ranch II Specific Plan Area is vacant of development and is used for agricultural projection. In the absence of any residential displacement or a substantial change in the availability of residential units, no significant impact would occur with implementation of the proposed Project. This impact was not found to be significant and no mitigation measures were required.

4.13.8.2. Proposed Project Impact Analysis

The proposed McCabe Ranch II TM 994 and Specific Plan Amendment would not result in changes to the location, size, or boundaries, or disturbance identified in the Certified EIR. The proposed uses and land use densities of the proposed Project would be consistent with those evaluated for the McCabe Ranch II Specific Plan. Additionally, as presented in **Table 4.7-3** of the SEIR, the proposed Project would be consistent with the General Plan's residential goals and policies including those added to the Land Use Element's 2015 Update.

The proposed Project would not increase the number of residential units beyond the 2,300 evaluated in the Certified EIR. Additionally, *SCAG's 2024 Demographics and Growth Forecast* found that the average number of persons per household in Imperial County ranged from 2.9 and 3.3 persons per household between 2025 and 2050 which is similar to the 3.4 persons per household used to calculate the Project's net population increases identified in the Certified EIR. Thus, development of the proposed Project is anticipated to result in the addition of approximately 7,590 persons to the County (2,300 DU x 3.3 persons per household /DU = 7,590 persons) compared to the 7,820 persons

[2] Southern California Association of Government reported the average number of persons per household in Imperial County to be 3.4.

identified in the Certified EIR. Population and housing impacts would be similar to those identified in the Certified EIR and would be less than significant.

4.13.8.3. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Because no significant or adverse impacts to population and housing resources would result from implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment, no mitigation measures are required.

4.13.8.4. Consistency Conclusions for Population and Housing

Since adoption of the Specific Plan in 2010, there have been no changes to the population and housing environment, or characteristics of the proposed project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to population and housing disclosed in the Certified EIR.

4.13.9 Recreation

4.13.9.1. Summary of Certified EIR Analysis

Potential impacts to recreational resources associated with development within the Project area were evaluated in Section 4.13 of the Certified EIR. The Certified EIR found that implementation of the proposed Project would be consistent with the "Specific Plan" land use designation of the County General Plan (Imperial County 2008).

The Certified EIR found that the proposed Project would increase the area's population and consequently increase the demand for parks and recreation facilities. This could have a potentially significant impact no recreational resources. Mitigation measure MM 4.13.1, conditioned the McCabe Ranch II Specific Plan to dedicate a minimum of 51.6 acres of parkland, to reduce the impact to below a level of significance.

4.13.9.2. Proposed Project Impact Analysis

The proposed Project includes a Tract Map for development of a portion of the Project area with residential, recreation, parks and school uses. The proposed uses and land use densities of the Mcabe Ranch II TM 994 would be consistent with those evaluated for the proposed Project and could increase the use of existing recreational facilities and require additional parkland, facilities, and personnel.

In 2015 the County published an updated Land Use Element (LUE) which enacted new goals and policies related to recreational resources that are applicable to the Project. Specifically, Objective

8.2 requires new developments to provide improvements to meet the added demands for parks and recreational facilities.

As shown on **Table 3-1**, the Project would provide a total of 60 acres of parks and open space including community, neighborhood and mini-parks as well as a linear/greenbelt area along the east side of Farnsworth Road. Thus, the proposed Project would be consistent with the goals described above.

The proposed McCabe Ranch II TM 994 and Specific Plan Amendment Project includes the provision of 60-acres of park and open space areas. This exceeds the Quimby Acts' requirement of 3-acres/1,000 residents. Therefore, potentially significant impacts to recreational resources would be reduced to less than significant with implementation of mitigation measure MM 4.13.1.

4.13.9.3. Measures Identified in the Certified EIR and Applicable to the Proposed Project

Measure 4.13.1 from the Certified EIR, will be modified to reflect the amount of park acreage included in the proposed Project to demonstrate compliance with the County's Park and Recreation Element and the Quimby Act. This would insure impacts to recreational resources would be maintained below a level of significance. ~~Strikeout~~ underline formatting is used to depict modifications.

MM 4.13.1 Parkland Dedication

The proposed Project shall be conditioned to require dedication of a minimum of 60 ~~51.6~~-acres of parkland.

Timing/Implementation: As a condition of project approval.

Enforcement/Monitoring: ICPDSD.

4.13.9.4. Consistency Conclusions for Recreation

Since adoption of the Specific Plan in 2010, there have been no changes to the recreation environment or characteristics of the proposed project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant impacts to recreation disclosed in the Certified EIR.

4.13.10 Vehicle Miles Traveled (VMT)

4.13.10.1. Summary of Certified EIR Analysis

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under California Environmental Quality Act

(CEQA). Under the new guidelines, VMT has been adopted as the most appropriate measure of transportation impacts under CEQA, effective July 1, 2020. State California Environmental Quality Act (CEQA) Guidelines Section 15162(a) provides criteria for when a subsequent or supplemental EIR must be prepared, including the following item of relevance to this discussion: (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following… The Air Quality Impact Analysis for McCabe Ranch II Specific Plan (Appendix B of the Previous 2010 EIR) included modeling that specifically considered the number and anticipated distance of vehicle trips to determine VMTs. While VMT is now the metric for assessing transportation impacts under CEQA, it was a concept available in 2010 and does not constitute "new information of substantial importance."

4.13.10.2. Proposed Project Impact Analysis

As discussed in Chapter 3.0 of the Draft SEIR, the proposed McCabe Ranch II TM 994 and Specific Plan Amendment will not increase development numbers or densities beyond what was evaluated in the Certified EIR, which already accounted for VMT. Specifically, the Air Quality Report for the McCabe Ranch Specific Plan Final EIR noted that the implementation of the project was anticipated to result in 190,130.96 VMT (Imperial County, 2010; Appendix B). . ()

Information regarding VMT was known with reasonable diligence at the time the Previous Final EIR was certified in 2010. Therefore, it does not comprise "new information of substantial importance" under CEQA and does not require supplemental analysis beyond this consistency analysis. As noted under *Concerned Dublin Citizens v. City of Dublin (2013) 214 Cal.App.4th 1301, 1318-1320*, subsequent changes to the CEQA guidelines are not "new information" triggering California Public Resources Code 21166 , subdivision (c)[3], so long as the underlying environmental issue was understood at the time of the initial EIR.

The proposed land uses and development densities that would be developed as well as the areas that would be disturbed under the proposed McCabe Ranch II TM 994 and Specific Plan Amendment would be similar to those identified in the Certified EIR. Therefore, the VMT impacts of the Project fall within the scope of and would be consistent with the findings and mitigation measures presented in the Certified EIR.

Additionally, as shown on **Table 4.6-1**, the McCabe Ranch II TM 994 and Specific Plan Amendment includes a number of features that serve to reduce VMT such as: the inclusion of commercial, educational and other residential-serving land uses within the SPA; on and off-site pedestrian and bicycle improvements to encourage non-motorized forms of transportation; the provision of

[3] California Public Resources Code § 21166 sets limits on when a subsequent or supplemental Environmental Impact Report (EIR) is required after an EIR has already been certified for a project under CEQA.

facilities for buses and other transit option; and, Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.

4.13.10.3. Mitigation Measures Identified in the Certified EIR and Applicable to the Proposed Project

Because no significant or adverse VMT impacts would result from implementation of the McCabe Ranch II TM 994 and Specific Plan Amendment, no mitigation measures are required.

4.13.10.4. Consistency Conclusions for VMT

Since adoption of the Specific Plan in 2010, there have been no changes to the development characteristics of the proposed Project as evaluated in the Certified EIR. Therefore, consistent with the findings of the Certified EIR, implementation of the McCabe Ranch II TM 994 would result in no new significant impacts and no substantial increase in the severity of significant VMT impacts disclosed in the Certified EIR.

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5.0 OTHER CEQA

State CEQA Guidelines Section 15126 requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation (California Code of Regulations. Title 14, Section 15126). As part of this analysis, the EIR must identify the following types of impacts:

- Significant environmental effects which cannot be avoided if the proposed project is implemented;
- Significant irreversible environmental effects which would be involved in the proposed project should it be implemented;
- Effects Found Not to be Significant; and
- Growth-inducing impacts of the proposed project.

The analysis in this chapter identifies each of these types of impacts based on analyses contained in Chapter 4, Supplemental Analysis to the McCabe Ranch II Specific Plan EIR.

5.1 Significant and Unavoidable Environmental Effects

State CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." As analyzed in Sections 4.2 through 4.13 and summarized in Chapter 1, Executive Summary of this Supplemental EIR, the proposed Project would not result in any significant impacts beyond those identified in the Certified EIR that would remain significant, unavoidable, and adverse, after mitigation measures are applied.

The Certified EIR identified significant and unavoidable impacts related to aesthetics, air quality, biological resources, cultural and paleontological resources, geology and soils climate change and greenhouse gases, hazards and human health, hydrology and water quality, land use , noise, public services, recreation, transportation, and utilities. However, for the reasons described in Sections 4.1 through 4.13, the proposed Project would result in no new significant impacts and no substantial increase in the severity of previously identified impacts disclosed in the 2010 Previous Final EIR.

5.2 Significant Irreversible Environmental Changes

State CEQA Guidelines require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely…. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resource" refers to the physical features of the natural environment,

such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed Project would result in or contribute to the following irreversible environmental changes:

- Increased vehicle trips on surrounding roadways during operation of future projects under the proposed Project (see Section 4.10, *Transportation*).
- Emissions of air pollutants and greenhouse gases associated with construction and operation of future.
- Projects under the proposed Project (see Section 4.2, *Air Quality,* and Section 4.6, *Greenhouse Gas*).
- Consumption of non-renewable energy associated with construction and operation of future projects t due to the use of automobiles, lighting, heating and cooling systems, appliances, construction materials, and the like (see Section 4.4, *Energy*).
- Increased ambient noise associated with an increase in activities and traffic from future projects under the proposed Project (see Section 4.8, *Noise*).

In regard to energy usage from development of future uses under the proposed McCabe Ranch II TM 994 and Specific Plan Amendment, as demonstrated in the analyses contained in Section 4.4, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of future proposed development, as ensured and verified by the County during the plan check and permitting process, prior to obtaining building permits. Development of future projects within the McCabe Ranch II Specific Plan area would incorporate energy-generating and conserving measures, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. Project-specific information related to energy consumption is provided in Section 4.4, *Energy,* of this Draft SEIR.

5.3 Effects Found Not to Be Significant

The project would generally be considered to have a significant effect if it is located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would:

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

b) Exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

d) 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.

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.

Analysis

Impact 5.3-1: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

According to CalFire's 2023 Fire Hazard Severity Zones in the State Responsibility Area's map [(1)], the McCabe Ranch II Tract Map 994 Project site and surrounding area are not located on lands in or near state responsibility areas nor on lands classified as very high fire hazard severity zones (CalFire, 2024). As noted in Section 4.13.5 Hazards and Hazardous Materials. the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact would occur.

[1] Effective April 1, 2024.

Impact 5.3-2: Would the Project exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors?

The Project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (CalFire, 2024). Therefore, the proposed Project would not exacerbate wildfire risks. No impact would occur.

Impact 5.3-3: 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 Project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (CalFire, 2024). Construction of the proposed McCabe Ranch II TM 994 Project would require the installation of roads and electrical distribution lines to support future development of the area. An IID substation would also be installed along McCabe Road to provide electrical power to the site. All electrical distribution lines and new, on-site utilities within the Specific Plan area will be placed underground. Further, all staging and construction activities, including roadway improvements, would be conditioned to maintain roadway access and/or access to the Project site and would not otherwise impair the implementation of emergency response plans. Therefore, the Project would not exacerbate a fire risk nor result in temporary or ongoing risk-related impacts to the environment. No significant impacts are anticipated.

Impact 5.3. 4: 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?

The Project Site is relatively flat and is not located adjacent to hillsides; therefore, the Project Site has negligible potential for landslides and slope instability. Appropriate stormwater drainage improvements to contain stormwater and reduce off-site flows are included in the proposed Tentative Map. As such, the Project would not be anticipated to expose people or structures to post-fire instability or flooding. Therefore, based on the above considerations, no impacts related to wildfire would occur.

5.4 Growth-Inducing Impacts

State CEQA Guidelines Section 15126.2(e), Growth Inducing Impact of the Proposed Project, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Remove obstacles to population growth;

2. Require the construction of new or expanded facilities that could cause significant environmental effects; or

Impact 5.4-1: Would the Project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would induce growth if it would provide public services or infrastructure with excess capacity, which would serve lands that would otherwise not be developable.

Overall, infrastructure proposed under the McCabe Ranch II TM 994 and Specific Plan Amendment would not provide additional capacity beyond what was previously planned in the adopted Specific Plan. The planned infrastructure improvements would only enhance services to the SPA and the Project does not provide an extension of service to areas that are currently not served or where growth was not previously planned. Therefore, the proposed Project would not result in significant growth inducing impacts.

Impact 5.4-2: Would the Project result in the need to expand one or more public services to maintain desired levels of service?

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The proposed Project is expected to incrementally increase the demand for fire protection and emergency response, police protection, school services, and recreational facilities but would not increase demand beyond that assumed for buildout of the County of Imperial.

The proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service but would provide park and open space uses to serve the SPA. It would also make school sites available for purchase by the McCabe Elementary and Heber Elementary School District. Additionally, mitigation measures are included in Section 4.9, Public Services, that would ensure service provider’s desired levels of service would be substantially reduced.

Based on build out projections, the proposed Project would not create a demand for services beyond the capacity of facilities considered in the Certified EIR. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities as a result of the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

6.0 CUMULATIVE IMPACTS

6.1. Approach to the Cumulative Impact Analysis

CEQA Guidelines, Section 15130 requires that EIRs include an analysis of the cumulative impacts to determine if the project's effect is considered cumulatively considerable. As defined by CEQA Guidelines, Section 15065(a)(3), "…'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects..." Section 15130(b)(1) goes on to identify two approaches for performing a cumulative analysis: (1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or (2) A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. The cumulative analysis for the proposed Project utilized the list approach. According to Section 15130(b)(2), when using the list method, it is important to consider the nature of each environmental resource being examined, the location of the project, and its type. In keeping with these provisions, a list of cumulative projects was developed and includes projects known at the time of release of the Notice of Preparation of the Draft SEIR, as well as additional projects that have been proposed since the NOP date. **Table 6-1** lists the cumulative projects.

As required by Section 15130 of California Environmental Quality Act (CEQA) Guidelines, the following discussion considers the cumulative impacts for relevant environmental issue areas.

6.2. CEQA Requirements For Cumulative Impact Analysis

The following analysis evaluates the potential for the proposed Project's environmental impacts to be cumulatively significant. CEQA requires that an environmental impact report contain an assessment of the cumulative impacts that could be contributed to by the proposed Project. "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or. . . compound or increase other environmental impacts." (CEQA Guidelines, § 15355.) Stated another way, "A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." (CEQA Guidelines, § 15130, subd. (a)(1)). Cumulative impacts occurs from a change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects.

TABLE 6-1: MCCABE RANCH II TM 994 AND SPECIFIC PLAN AMENDMENT – POTENTIAL CUMULATIVE PROJECTS

No	Project Name/ Application #	Owner/ Applicant	Summary Project Description	Project Type
1	USG Plaster City Quarry Expansion and Well No. 3 Project	Plaster City Quarry	Well No. 3 would be located east of the existing Quarry on a USG-owned parcel (Assessor's Parcel Number [APN] 033-020-009). The proposed pipeline would be approximately 3.5 miles in length and would be developed within an existing right-of-way over an additional 12.7 acres	Mining
2	Burtec Waste Industries	Burrtec Waste Industries, LLC	Conditional Use Permit #24-0018 amend Conditional Use Permit #23-0030 to allow for 2 existing water wells and an additional 3rd water well to operate under the CUP with no change to the 92,000 gallons per day, 365 days a year (105-acre feet) in water allotment already allowed in CUP #23-0030 and no other development proposed.	Water well addition to an existing landfill.
3	Dogwood Geothermal Energy Project	OrHeber 3, LLC, Heber Field Company, LLC, and the Second Imperial Geothermal Company	Three (3) Conditional Use Permits for a geothermal plant and associated ancillary and auxiliary facilities, new substation, 7 MW solar facility, and medium voltage distribution cable from the proposed solar facility to the geothermal plant. Heber 2 Solar Energy Project – CUP No. 23-0021 - A 15 MW behind the meter solar facility would provide supplemental/auxiliary energy to the existing Heber 2 geothermal plant. Heber Field Company Geothermal Wells and Pipeline Project – CUP No. 23-0022. three geothermal production wells, all within the Imperial County Geothermal Overlay Zone. The wells will be sited at three locations within APNs 059-020-001 and 054-250-017. The injection well would be installed within the HGEC, immediately next to the proposed Dogwood OEC.	Renewable Energy
4	6th Street and Spear Avenue Affordable Housing Project	Chelsea Investment Corporation	Chelsea Investment Corporation, proposes to develop a 288-unit affordable housing project on a 12.90-acre parcel (APN 053-740-040).	Affordable Housing
5	Vazquez Apartments	Calipatria Rentals, LLC	Change of zone (COZ 22-05) and general plan amendment (GPA 22-05) for 2.39 acres of disturbed land located within the City of El Centro, California to construct two (2) two-story apartment buildings for a total of fifty-six (56), residential units.	Affordable Housing

TABLE 6-1: MCCABE RANCH II TM 994 AND SPECIFIC PLAN AMENDMENT – POTENTIAL CUMULATIVE PROJECTS

No	Project Name/ Application #	Owner/ Applicant	Summary Project Description	Project Type
6	CR&R Waste Transfer Facility	CR&R	General Plan Amendment on 8.95 acres of vacant land in City of El Centro for a 66,575 SF transfer station building and on-site improvements.	Solid Waste Transfer Station
7	Town Center Village II Single Family Residential and Industrial Project	YK America Group	Development of the approximately 35.8-acre site for single-family residential and light industrial development.	Mixed Use

Sources:
County of Imperial, 2023.
County of Imperial, 2025.
County of Imperial 2024.
City of El Centro, 2023a.
City of El Centro, 2023b.
City of El Centro, 2023c.
Imperial County Transportation Commission, 2022.

Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time. (CEQA Guidelines, § 15355, subd. (b)).

In addition, CEQA Guidelines, Section 15130(b), identify three elements that are necessary for an adequate cumulative analysis:

1. Either:

    a. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

    b. A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

2. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and

3. A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

6.3. Geographic Scope and Timeframe of the Cumulative Effects Analysis

The geographic area of cumulative effects varies by each resource area considered in Chapter 4. For example, air quality impacts tend to disperse over a large area, while traffic impacts are typically more localized. Similarly, impacts on the habitats of special-status wildlife species need to be considered within its range of movement and associated habitat needs. The analysis of cumulative effects in this EIR considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of each analysis is based on the topography surrounding the project sites and the natural boundaries of the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative effects will often extend beyond the scope of the direct effects of a project, but not beyond the scope of the direct and indirect effects of that project. Because the setting for cumulative analysis varies from resource to resource and is attributable to the specific characteristics of each resource being evaluated, the cumulative setting for each resource has been defined separately for the purposes of this EIR.

The cumulative development scenario includes projects that extend through year (2068), which is the planning horizon of the proposed Project. Because of uncertain development patterns that are far in the future, it is too speculative to accurately determine the type and quantity of cumulative projects beyond this timeframe.

6.4. Cumulative Analysis Approach

As stated above, CEQA Guidelines require the use of a list of past, present, and probable future projects and/or the use of adopted projections from a general plan, other regional planning document, or a certified EIR. The list approach has been used in this EIR.

This cumulative impact analysis utilizes an expanded list method (as defined under CEQA) and considers environmental effects associated with those projects identified in **Table 6-1** in conjunction with the impacts identified for the project in Chapter 4 of this SEIR. **Table 6-1** includes projects known at the time of release of the NOP of the EIR. Some of the cumulative impacts associated with the proposed Project are more localized in nature (e.g., noise) and, thus, are analyzed at a project level. Other cumulative impacts are regional in nature (e.g., air quality, greenhouse gases and climate change) and, therefore, are analyzed at a regional level. Because of this variance in impact range, each resource area has been evaluated and an appropriate Cumulative Effects Study Area (CESA) has been defined for each resource. (CEQA Guidelines, § 15130, subd. (b)(3).)

The analysis of cumulative effects considers a number of variables including geographic limits, temporal limits, and the characteristics of the resource being evaluated. The geographic scope of each analysis is based on the topography surrounding the projects and the natural boundaries of the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative

effects will often extend beyond the scope of the direct effects, but not beyond the scope of the direct and indirect effects of the Project. In addition, each cumulative project has its own implementation schedule, which may or may not coincide or overlap with the proposed Project. However, to be conservative, the cumulative analysis assumes that all projects in the cumulative scenario are built and operating during the operating lifetime of the Project.

6.5. Environmental Consequences, Impacts, And Mitigation Measures

According to CEQA Guidelines, Appendix G, the proposed Project would be expected to result in a cumulative impact if the projects would have impacts that are individually limited, but cumulatively considerable. CEQA Guidelines, Appendix G, further states, "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 probably future projects.

The following cumulative impacts analysis used the above standard of significance in combination with project standards of significance for each environmental resource area evaluated in the EIR.

A proper cumulative impacts analysis requires a two-step inquiry. The first question is whether the combined effects from both the proposed project and other projects would be cumulatively significant. If the agency answers this question in the affirmative, the second question is whether "the proposed project's incremental effects are cumulatively considerable." (*Communities for a Better Environment v. California Natural Resources Agency* (2002) 103 Cal.App.4th 98, 120.) Thus, agencies should not merely compare the incremental effect of a proposed project against the collective impacts of all other relevant projects, yielding the proposed project's "relative" impact vis-à-vis the impacts of the other projects. Rather, in making the first required inquiry, the lead agency must add the project's incremental impact to the anticipated impacts of other projects. (*Id.* at pp. 117-121.) See also, CEQA Guidelines section 15130, subdivision (h)(1), which states that "[w]hen assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." However, "[t]he mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." (CEQA Guidelines, § 15130, subd. (h)(4)). It is not necessarily true that, even where cumulatively significant impacts are significant, any level of incremental contribution must be deemed cumulatively considerable. (*Communities for a Better Environment, supra,* 103 Cal. App.4th at p. 120.)

6.6. Cumulative Impact Analysis

The following text provides the analysis of impacts to each resource section, based upon the study area definitions above.

6.6.1. Air Quality

The CESA for comprehensive air quality analysis includes the entire Imperial Valley under the jurisdiction of the Imperial County Air Pollution Control District (APCD). Although a single project would rarely cause a violation of a federal or state criteria pollutant standard, a new source of pollution may contribute to violations of criteria pollutant standards due to existing background sources or foreseeable future projects.

The Project's contribution to cumulative air quality impacts would be different during construction and operations. All existing and foreseeable projects in **Table 6-1** may contribute to cumulative effects for air quality.

The Salton Sea air basin is currently designated as being in nonattainment for O3 and PM_{10} under both the National and California Ambient Air Quality Standards. This is considered a significant cumulative impact. During both construction and operations, the proposed Project would emit PM_{10} and NOx (an ozone precursor).

The proposed Project would not make a cumulatively considerable incremental contribution to a significant cumulative air quality impact.

The proposed project is in conformance with the local Air Quality Attainment Plan and does not generate carbon monoxide hotspots. This is considered to be a less than cumulatively considerable impact.

Construction activities associated with buildout of the proposed Specific Plan area, in combination with existing, approved, proposed and reasonably foreseeable development, could contribute to the cumulative effects of criteria pollutant emissions in the Salton Sea Air Bain. The project's contribution to this impact would be potentially cumulatively considerable.

Compliance with proposed with Mitigation Measure 4.3.1, would ensure construction emissions during buildout of the proposed Specific Plan area would be maintained below ICAPCD PM10 significance thresholds.

Long-term operation of the proposed project would increase emissions of both attainment pollutants (i.e., carbon monoxide) and nonattainment pollutants (i.e., PM10, ozone precursors ROG and NOx) in the region from motor vehicles and area sources. This, in combination with existing, approved, proposed and reasonably foreseeable development, could contribute to new exceedances of attainment pollutants or continued exceedances of ozone and PM10 standards. This is considered to be a potentially cumulatively considerable impact.

As noted in the discussion related to Impact 4.2.2, construction and long-term operation of the proposed Project would result in increases in air pollutant emissions. However, neither

construction nor operational emissions would exceed the ICAPCD standards and would not result in significant air quality impacts.

Mitigation measure MM 4.3.1, identified in the Certified EIR to reduce significant construction related air quality and odor impacts has been modified to reflects the ICAPDC's current rules, regulations and mitigation measures. Additionally, mitigation measures MM 4.3.2a, MM 4.3.2b, and MM 4.3.2c continue to be applicable to the proposed Project. With the addition of Condition of Approval AQ-1: Enhanced Dust Control Plan the Project's impacts on air quality would be reduced to less than cumulatively considerable with mitigation.

6.6.2. Biological Resources

Generally, the CESA for biological resources includes the entirety of the Imperial Valley. This extent (the entire Imperial Valley region) makes it possible to account for impacts to biological resources that may have restricted migration to and from adjacent physiographic regions due to habitat changes from region to region. All existing and foreseeable future projects in **Table 6-1** may contribute to cumulative effects for biological and natural resources.

In conjunction with other development projects in the project vicinity (**Table 6-1**), the proposed Project would not have a cumulatively considerable impact on biological resources. With the implementation of mitigation measures MM 4.4.4 and MM BIO-1 through MM BIO-11 the Project would have less than significant impacts because these measures require the performance of professionally accepted and legally compliant procedures for the avoidance; preservation and/or and restoration; and monitoring of sensitive biological resources. For the above reasons, the Project's impacts on biological resources would be reduced to less than cumulatively considerable with mitigation.

6.6.3. Cultural, Paleontological and Tribal Cultural Resources

The CESA for cultural and paleontological resources consists of the Imperial Valley, including the southern portion of Riverside County. This geographic scope is appropriate because it is likely that cultural resources similar to those in the project area are present throughout the Imperial Valley, and that ground disturbance required for existing, approved, and reasonably foreseeable projects would likely have impacted or would impact similar resources. The occurrence of the impact would be primarily during construction of the proposed Project and/or any of the foreseeable projects, but impacts would be permanent. All foreseeable projects on Table 6-1 may contribute to cumulative effects for cultural and tribal resources, because all are likely to involve ground-disturbing activities to some extent during construction.

The proposed Project, in combination with existing, approved, proposed, and other reasonably foreseeable projects in the CESA, could result in impacts to prehistoric resources, historic resources, paleontological resources, and human remains.

Construction of multiple projects in the region could result in the loss and/or degradation of cultural or tribal cultural resources regionally, and could also result in the disturbance of human remains. Without proper mitigation, the cumulative effects of these types of large-scale development projects on cultural resources could be significant.

Project-related ground-disturbing activities could uncover previously unknown prehistoric, historic, as well as paleontological resources within Project boundaries. Therefore, the proposed Project have the potential to incrementally contribute to the disturbance of previously unknown cultural and paleontological resources.

The proposed Project will be required to implement mitigation measures MM CUL-1 through MM CUL-6 to reduce potential impacts to archaeological, historical and paleontological resources during construction to below a level of significance. Existing, approved, proposed, and other reasonably foreseeable projects with potentially significant impacts to archaeological, historical and tribal cultural resources would be required to comply with federal, state, and local regulations and ordinances protecting cultural resources through implementation of similar mitigation measures during construction. Therefore, with implementation of regulatory requirements and standard conditions of approval, and Mitigation Measures MM CUL-1. through MM CUL 6; (Section 4.11 and 4.13), the proposed Project's contribution to impacts to cultural and tribal cultural resources would not be cumulatively considerable.

6.6.4. Greenhouse Gas Emissions

In considering greenhouse gas impacts, it is necessary to consider both anthropogenic and natural sources. For the proposed Project the CESA is the Imperial County portion of the Salton Sea Air Basin. In confining the analysis to this extent, it is possible to accurately calculate cumulative emissions and track the region's contribution to climate change. The duration of impacts would be the lifetime of the project, but there would be different potential impacts during construction and operations.

All existing and foreseeable projects listed in **Table 6-1** may have a cumulative effect on climate change. The climate change analysis conducted in the Greenhouse Gas Emission section is equivalent to a cumulative analysis. Please see Section 4.6 of this SEIR.

6.6.5. Land Use

The CESA for the analysis of cumulative impacts related to land use compatibility is the rural agricultural areas on the south side of I-8 within the County of Imperial's and the City of El Centro's jurisdictions. Cumulative impacts could result from the physical division of an established community or from conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental impacts. As there would be no

communities divided by the proposed Project, nor would there be a conflict with a land use plan, policy, or regulation, there is no cumulative impact.

6.6.6. Noise

The CESA for the analysis of cumulative impacts related to noise is generally limited to areas within approximately one mile of the McCabe Ranch II Specific Plan Area site, along with the haul routes used for transporting construction workers, equipment and materials the area during the construction of all phases. This extent is appropriate because noise impacts are generally localized; however, it is possible that noise from different sources could combine to create a significant impact to receptors at any point between the projects, as well as along the common roadways utilized by the projects. At distances greater than one-mile, impulse noise may be briefly audible and steady construction and/or operational noise would generally dissipate such that the level of noise would reduce to below County of Imperial noise limits and blend in with background noise levels.

Cumulatively considerable noise impacts would occur during construction or operations if noise levels at sensitive receptors exceed 70 dBA at a receptor boundary. Noise effects are not additive because noise attenuates over distance, as does groundborne vibration; therefore, only noise or vibration generated in close proximity could contribute to the noise heard or vibration felt at a receptor.

The only foreseeable project near enough to the Project site to be included in the cumulative analysis is the Town Center Village II Single Family Residential and Industrial Project. Given the nature of this foreseeable project, and the County noise restrictions, noise from this cumulative project and proposed Project would not likely combine to create noise above 70 dBA or perceptible groundborne vibration during construction or operations at these receptors. Thus, the noise levels in the area would be less than cumulatively considerable.

6.6.7. Transportation

The CESA for cumulative effects on transportation and circulation includes the local roadway network considered for analysis of the proposed project's direct impacts including SR 86, McCabe Road, Dogwood Road and Correll Road.

During construction and operations, the proposed Project would add daily trips to the regional transportation system. According to the traffic impact study developed by Linscott, Law & Greenspan, all affected road segments, key intersections, and affected highways would operate at acceptable levels of service during construction and operation of the Project, with implementation of Project mitigation. The Project would not contribute to a cumulatively significant impact during construction.

6.6.8. Utilities and Service Systems

Impacts to utilities and service systems can occur if new facilities need water or power or generate wastewater requiring treatment that exceeds the existing or planned capacity of the local service providers. Service providers serving the Project site are located in Imperial County; therefore, the CESA for cumulative impacts to utilities and services is limited to Imperial County. The duration of impacts would be the lifetime of the projects, but there would be different potential impacts during construction and operations.

All existing and foreseeable projects in **Table 6-1** may contribute to cumulative effects for utilities and services. However, the proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact to utilities and services.

7.0 ALTERNATIVES ANALYSIS

7.1. Introduction

The potential environmental consequences of the San Pablo Avenue Specific Plan were analyzed in detail in the 2010 Previous Final EIR for the McCabe Ranch II Specific Plan. After considering a reasonable range of potentially feasible alternatives, the County chose to adopt the Specific Plan project as proposed. This SEIR is intended to supplement the County-certified 2010 Final EIR; it is not intended to be a completely new EIR. As required under CEQA Guidelines Section 15163, the scope and content of this supplement to the 2010 EIR is limited to additions and changes necessary to make the previous EIR adequate for the project as revised.

This section analyzes the alternatives to the McCabe Ranch II TM 994 and Specific Plan Amendment Project (Project or proposed Project) that have been considered in this Draft Supplemental EIR to explore potential means to avoid or substantially lessen the significant environmental impacts associated with implementation of the proposed Project, which involves processing a Subdivision Tract Map (TM) to accommodate the phased development within a portion of the McCabe Ranch II Specific Plan area; a modification of the Specific Plan's circulation element, an amendment to the approved McCabe Ranch Specific Plan and a General Plan Amendment. Additionally, the proposed Project includes an annexation of the Specific Plan area into the Heber Public Utility District (HPUD) and entering a Development Agreement with the County of Imperial (County). This SEIR addresses only the environmental issues that are raised by the differences between the approved 2010 Specific Plan and the proposed McCabe Ranch II TM 994 and Specific Plan Amendment.

7.2. Purpose and Scope

Pursuant to State CEQA Guidelines Section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. The State CEQA Guidelines also state that an EIR need not consider every conceivable alternative or consider alternatives that are infeasible. Under CEQA, factors that can determine feasibility are site suitability, economic limitations, availability of infrastructure, consistency with applicable plans, regulatory limitations, and jurisdictional boundaries.

Pursuant to State CEQA Guidelines Section 15126.6(d), the discussion of each alternative presented in this section of the Draft Supplemental EIR is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed project. Therefore, an EIR should present a reasonable range of feasible alternatives that will support

informed decision-making and public participation regarding the potential environmental consequences of a project and possible means to address those consequences. An EIR need not consider alternatives whose effects cannot be reasonably ascertained and whose implementation is remote or speculative.

The alternatives analysis must also include a comparative evaluation of the No Project Alternative in accordance with State CEQA Guidelines Section 15126.6(e) to determine the consequences of not implementing the project. Through the identification, evaluation, and comparison of alternatives, the relative advantages and disadvantages of each alternative compared with the proposed project can be determined.

Based on the CEQA requirements described above, the alternatives addressed in this Draft Supplemental EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of State CEQA Guidelines Section 15126.6(e) to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative.

Neither the CEQA statute, the State CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, as stated in State CEQA Guidelines 15126(f), "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice."

7.3. Project Objectives

State CEQA Guidelines Section 15124(b) (Title 14, California Code of Regulations) requires that the description of the project shall contain a statement of objectives sought by the proposed project. As presented in Chapter 3.0 of this Draft Supplemental EIR, the following objectives have been identified for the McCabe Ranch II Specific Plan and for the proposed Project:

Objective 1: Develop a highly walkable community plan that integrates a variety of residential uses, including conventional and gated communities, commercial areas, parks, schools, and other facilities essential to the daily lives of the residents.

Objective 2: Provide a variety of housing opportunities, ranging in size and affordability, to meet the housing needs of the region.

Objective 3: Incorporate the village commercial area to provide adequate service and shopping opportunities for both local residents and visitors.

Objective 4: Provide the business/office area to support job creation within the Plan.

Objective 5: Incorporate design features that support a unique living environment with a strong sense of community and social interaction.

Objective 6: Use a series of parkland areas connected by a trails system to link compatible land uses that are within easy walking distance of each other.

Objective 7: Promote an active lifestyle by providing a variety of recreation amenities such as recreational sports facilities, passive parks, walking trails, bike routes, parks, and open spaces.

Objective 8: Provide a park or open space within a five-minute walking distance of most residences in the Plan area.

Objective 9: Enhance the community's well-used sports facilities and reputation as a youth sports community by incorporating a variety of sports fields within many of the Plan's park areas.

Objective 10: Design a safe and efficient circulation system that adequately supports the anticipated level of traffic in and around the Plan area.

Objective 11: Provide public services that meet the needs of development in the Plan area, including a potential sheriff storefront in the village.

Objective 12: Develop a financing and phasing plan that provides for the efficient and timely provision of infrastructure and public services as development occurs.

Objective 13: Assist in the planning, design, construction and financing of school facilities to serve the specific plan area concurrent with the phasing of development of the residential uses.

Objective 14: Develop within an urban land use designation that does not require an Amendment to the General Plan Land Use Element to avoid further reduction of agriculturally zoned lands.

Objective 15: Maximize the number of residential units to be developed within each of the designated residential parcels to assist the County and state in addressing the housing crisis in California, while maintaining the overall residential cap of 2,300 DUs identified in the adopted McCabe Ranch II Specific Plan.

Objective 16: Minimize the number of mini-estate and-estate lots (10,000 SF and larger) while maximizing the number of flex and small lots to provide more attainable housing opportunities.

Objective 17: Increase the maximum allowed number of multi-family units from that provided in the adopted McCabe Ranch II Specific Plan to further provide more attainable housing opportunities.

Objective 18: Maintain the allowable densities and intensities of development identified in the adopted McCabe Ranch II Specific Plan as allocated to those parcels under separate ownerships from the applicant's parcels.

Objective 19: Obtain public services from a willing public entity whose sphere of influence currently includes the subject development for efficiency.

Objective 20: To the extent feasible, cooperate with the separate ownerships within the McCabe Ranch II Specific Plan Area in the phasing and cost sharing of the necessary public infrastructure.

7.4. Significant Impacts of the Project

The potential environmental consequences of the McCabe Ranch II Specific Plan were analyzed in detail in the Certified EIR for the McCabe Ranch II Specific Plan EIR . After considering a reasonable range of potentially feasible alternatives, the County chose to adopt the Specific Plan project as proposed. This SEIR is intended to supplement the County-certified 2010 EIR; it is not intended to be a completely new EIR. As required under CEQA Guidelines Section 15163, the scope and content of this supplement to the Certified EIR is limited to additions and changes necessary to make the previous EIR adequate for the Project as revised. Consequently, this SEIR addresses only the environmental issues that are raised by the differences between the approved 2010 McCabe Ranch II Specific Plan and the proposed McCabe Ranch II TM 994 and Specific Plan Amendment.

The scope of any further alternatives analysis would therefore be limited to a discussion of alternatives to the proposed McCabe Ranch II TM 994 and Specific Plan Amendment (Project) that would avoid or substantially lessen the significant effects resulting from the Project beyond the alternatives analysis in the Certified EIR.

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts of the proposed Project. CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. As analyzed in Sections 4.2 through 4.13 of this SEIR, the proposed Project would not result in any significant impacts beyond those identified in the Certified EIR that would remain significant, unavoidable, and adverse, after mitigation measures are applied.

However, the proposed Project includes a new component, that was not included in the adopted McCabe Ranch II Specific Plan. Specifically, the proposed TM 994 would underground those portions of the Date Drain No. 3 and Dogwood Lateral Canal No. 2 that traverse the Specific Plan Area.

7.5. Alternatives Analysis Format and Methodology

CEQA Guidelines Section 15126.6(d) provides that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Under CEQA Guidelines Section 15151, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of the Project alternatives need not be as thorough or detailed as the analysis of the Project itself.

The level of analysis in the following sections is sufficient to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. In addition, each alternative is evaluated to determine whether the Project objectives, would be substantially attained by the alternative.

The evaluation of each alternative also considers the anticipated net environmental impacts after implementation of feasible mitigation measures. The net impacts of the alternatives for each environmental issue area are classified as either having No Impact, a Less-Than-Significant Impact, or a Significant And Unavoidable Impact. These impacts are then compared to the corresponding impact for the Project in each environmental issue area. To facilitate the comparison, the analysis identifies whether the net incremental impact would clearly be less, similar, or greater than that identified for the Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic Project objectives.

7.6. Alternatives to Be Analyzed

7.6.1. No Project/No Build (Alternative 1)

The Certified EIR evaluated the No Project, No Build Alternative scenario as Alternative 1. Under Alternative 1, the No Project, No Build Alternative scenario, the Specific Plan Area was assumed to remain in its current condition as active and fallow agricultural fields, canals, and drains.

Impacts Compared to Proposed Project

Under the No Project Alternative none of the impacts identified for construction, or operation of the proposed Project would occur.

Conclusion

Avoid or Substantially Lessen Project Impacts

The No Project Alternative would avoid the significant and potentially significant impacts of the proposed Project related to air quality, biological resources, cultural and tribal resources, geology/soils (paleontological resources), hazards/hazardous materials, hydrology/water quality noise, transportation and utilities and service systems, each of which have been mitigated to below the level of significance.

Attainment of Project Objectives

Under the No Project Alternative, the none of the Project objectives would be met.

Comparative Merits

None of the impacts identified for construction, or operation of the proposed Project would occur. Additionally, all of the objectives of the project objectives would remain unfulfilled under the No Project Alternative.

Significant Impacts of Alternative

The No Project Alternative would not result in significant impacts.

7.6.2. Fencing Date Drain No. 3 and Dogwood Lateral Canal No. 2 (Alternative 2)

The proposed Project includes a new component, that was not included in the adopted McCabe Ranch II Specific Plan. Specifically, proposed TM 994 would underground those portions of the Date Drain No. 3 and Dogwood Lateral Canal No. 2 that traverse the TM area. Four burrowing owl protocol surveys were conducted for the TM area and a 500-foot buffer zone around its perimeter (Biological Survey Area or (BSA)) on April 9th, April 30th, May 24th and June 19, 2024.

Western burrowing owls (BOUWs), active burrows and occupied burrows were identified as occurring within or near the BSA **(Figure 4.3-2)** during the 2024 biological surveys. Specifically,

- Burrow #1 was found on-site within the Phase 1B development area;
- Burrow #2 was found on-site within the Phase 2A development area, along the Date Drain No. 3;
- Burrow #3 was also found on-site within the Phase 2A development area, along the Date Drain No. 3; and,
- Burrow #4 was found on-site within Phase 1B development area between the Date Drain 3 and Dogwood Lateral 2.

Along the IID ROW were several depressions and erosions that could possibly be utilized as a burrow. Nesting activities observed included BUOW pairing; decorations around burrow; vocalization. Occasional bobbing was also observed. Appendix D of the Biology Report (Appendix C) discusses the results of the protocol level burrowing owl survey conducted in greater detail.

Due to the presence of western burrowing owls within the IID right-of-way, an alternative was evaluated that would avoid undergrounding those portions of the Data Drain No. 3 and Dogwood Lateral Canal No. 2 that traverse the TM area. Instead, Alternative 2 consists of installing fencing outside the IID right-of-way around the Date Drain No. 3 and the Dogwood Lateral Canal No. 2 between McCabe Road and Correl Road. The location of the BOUWs observed and the placement of fencing is depicted on **Figures 7-1, 7-2 and 7-3**. This analysis assumes the fencing material would either be chain-link fencing or wrought-iron fencing, six (6) feet in height, and would be approved by IID prior to installation.

Impacts Compared to Proposed Project

Implementation of the proposed Project, including undergrounding portions of the Date Drain No. 3 and Dogwood Lateral Canal No. 2, could have potentially significant impacts to the Western burrowing owl, which has been petitioned for listing as threatened or endangered pursuant to the CESA. The Jurisdictional Delineation conducted for the Project (see Biological Resources Report, Appendix C) found that the Dogwood Lateral No. 2 is considered jurisdictional by the California Dept of Fish and Wildlife (CDFW) and by the Regional Water Quality Control Board (RWQCB) under the Porter Cologne Act. Undergrounding the Dogwood Lateral Canal No. 2 could result in the loss of 0.371 acres of CDFW/RWQCB Waters of the State would be permanently affected by the Project. Installing fencing around and outside of the right-of-way of the IID facilities, would avoid the need for undergrounding which would avoid impacts to BOUWs and impacts to Waters of the State.

Conclusion

Avoid or Substantially Lessen Project Impacts

The No Project Alternative would avoid the significant and potentially significant impacts of the proposed Project related to air quality, biological resources, cultural and tribal resources, geology/soils (paleontological resources), hazards/hazardous materials, hydrology/water quality noise, public services, transportation and utilities and service systems, each of which have been mitigated to below the level of significance.

Attainment of Project Objectives

Alternative 2, Fencing the IID Facilities, would achieve all objectives of the project, but would not be consistent with Policy 1.9 of the County of Imperial Seismic and Public Safety Element of the

General Plan. This policy encourages the underground of open canal adjacent to and within urban areas.

Comparative Merits

With the exception of impacts to BOUWs and waters of the state, the impacts identified for construction, or operation of the proposed Project would be similar to those identified for the proposed Project.

Significant Impacts of Alternative

Alternative 2 would not result in significant impacts beyond those identified for the proposed Project.

7.7. Environmentally Superior Alternative

As required by CEQA Guidelines, Section 15126.6, an EIR must identify an "environmentally superior alternative," which is the alternative that has the least impact on the environment or would be capable of avoiding or substantially lessening any significant impacts of the project. **Table 7-1, Summary of Alternatives Compared to the Proposed Project**, shows each alternative's environmental impacts compared to the impacts of the proposed Project.

The alternative that results in the least environmental impact, considering both the frequency and magnitude of the impact, is the environmentally superior alternative. In cases where the No Project Alternative is environmentally superior, the EIR is required to identify the next environmentally superior alternative among the others evaluated. Alternative A (No Project/No Development) is the alternative that results in the least environmental impact.

As shown in **Table 7-1**, Alternative 1 (No Project/No Build), would be environmentally superior to the proposed Project for all resource areas analyzed in the Draft SEIR. As required by CEQA, the next environmentally superior alternative is Alternative 2 (Fencing Date Drain No. 3 and Dogwood Lateral Canal No. 2 Thru TM 994. Alternative 2 would be environmentally superior to the proposed Project under one resource area and environmentally similar to the Project under 10 resource areas.

TABLE 7-1: SUMMARY OF ALTERNATIVES COMPARED TO THE PROPOSED PROJECT

Environmental Resource	Proposed Project	No Project/ No Project (Alternative 1)	Fencing Date Drain No. 3 / Dogwood Lateral Canal No. 2 Thru TM 994 (Alternative 2)
1. Air Quality	**LTS-MM**	**NI / +**	**LTS-MM / =**
2. Biological Resources	**LTS-MM**	**NI / +**	**LTS-MM /+**

TABLE 7-1: SUMMARY OF ALTERNATIVES COMPARED TO THE PROPOSED PROJECT

Environmental Resource	Proposed Project	No Project/ No Project (Alternative 1)	Fencing Date Drain No. 3 / Dogwood Lateral Canal No. 2 Thru TM 994 (Alternative 2)
3. Energy	**LTS**	**NI / +**	**LTS / =**
4. Environmental Justice	**LTS**	**NI / +**	**LTS / =**
5. Greenhouse Gas Emissions	**LTS**	**NI / +**	**LTS / =**
6. Land Use and Planning	**LTS**	**NI / +**	**LTS / =**
7. Noise	**LTS-MM**	**NI / +**	**LTS-MM/ =**
8. Public Services	**LTS-MM**	**NI / +**	**LTS-MM/ =**
9. Transportation and Traffic	**LTS-MM**	**NI / +**	**LTS / =**
10. Tribal Cultural Resources	**LTS-MM**	**NI / +**	**LTS-MM / =**
11. Utilities and Service Systems	**LTS-MM**	**NI / +**	**LTS-MM / =**
TOTALS		**+ 11 - 0 = 11**	**+ 1 - 0 = 10**
Meets Most of the Basic Project Objectives?	**Yes**	**No**	**Yes**

Notes:

NI	Finding of no environmental impact.
LTS	Finding of less than significant environmental impact.
LTS-MM	Finding of less than significant environmental impact with mitigation measure.
SU	Finding of significant and unmitigable impact.
+	Alternative is superior (reduced impacts compared) to the proposed Project.
-	Alternative is inferior (greater impacts compared) to the proposed Project.
=	Alternative is environmentally similar to the proposed Project.

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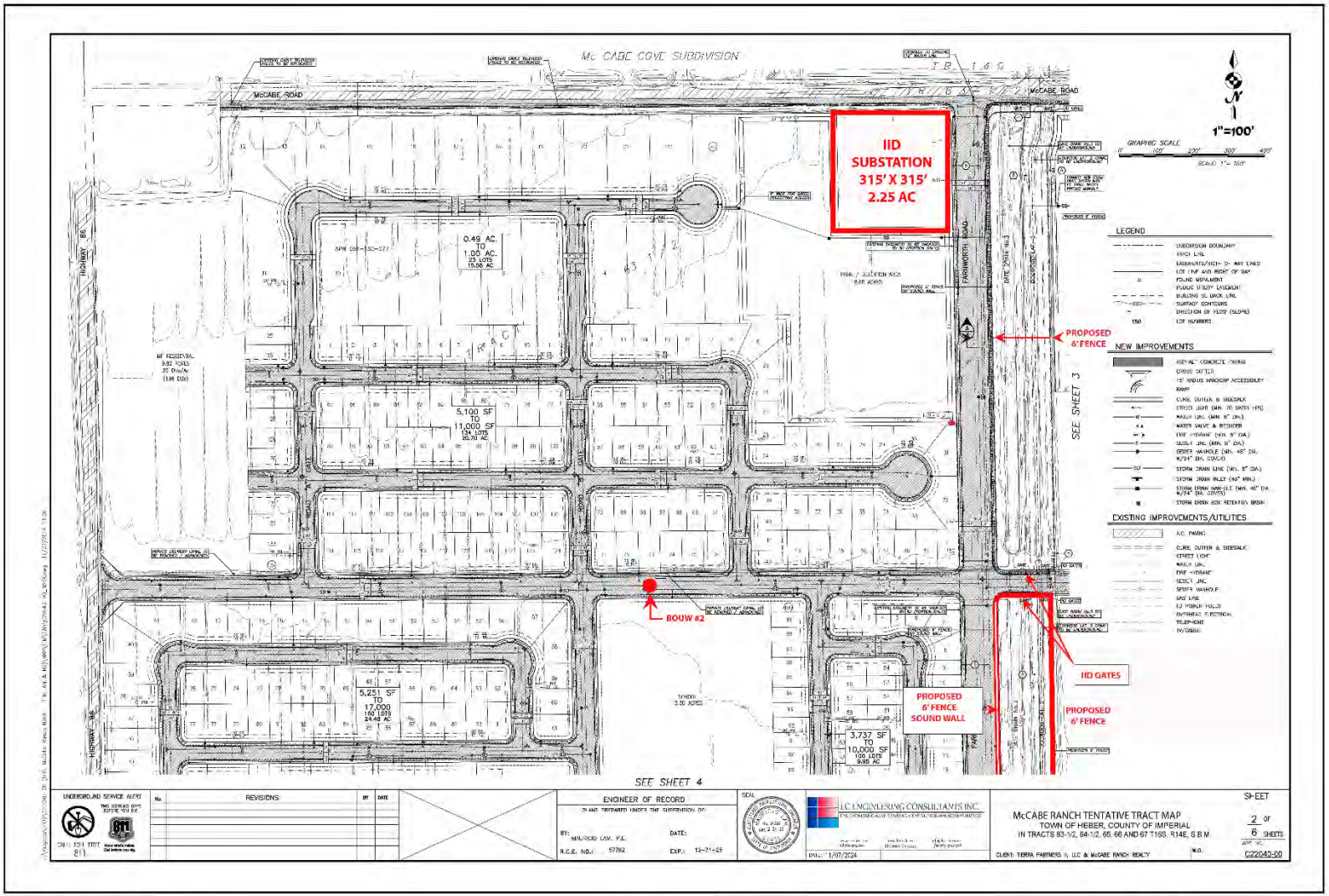

Source: Dubose Design, 2025.

IID Facilities Fencing Alternative - TM 994 Sheet 2 of 6
McCabe Ranch II Tract Map 994 and SPA
Figure 7-1

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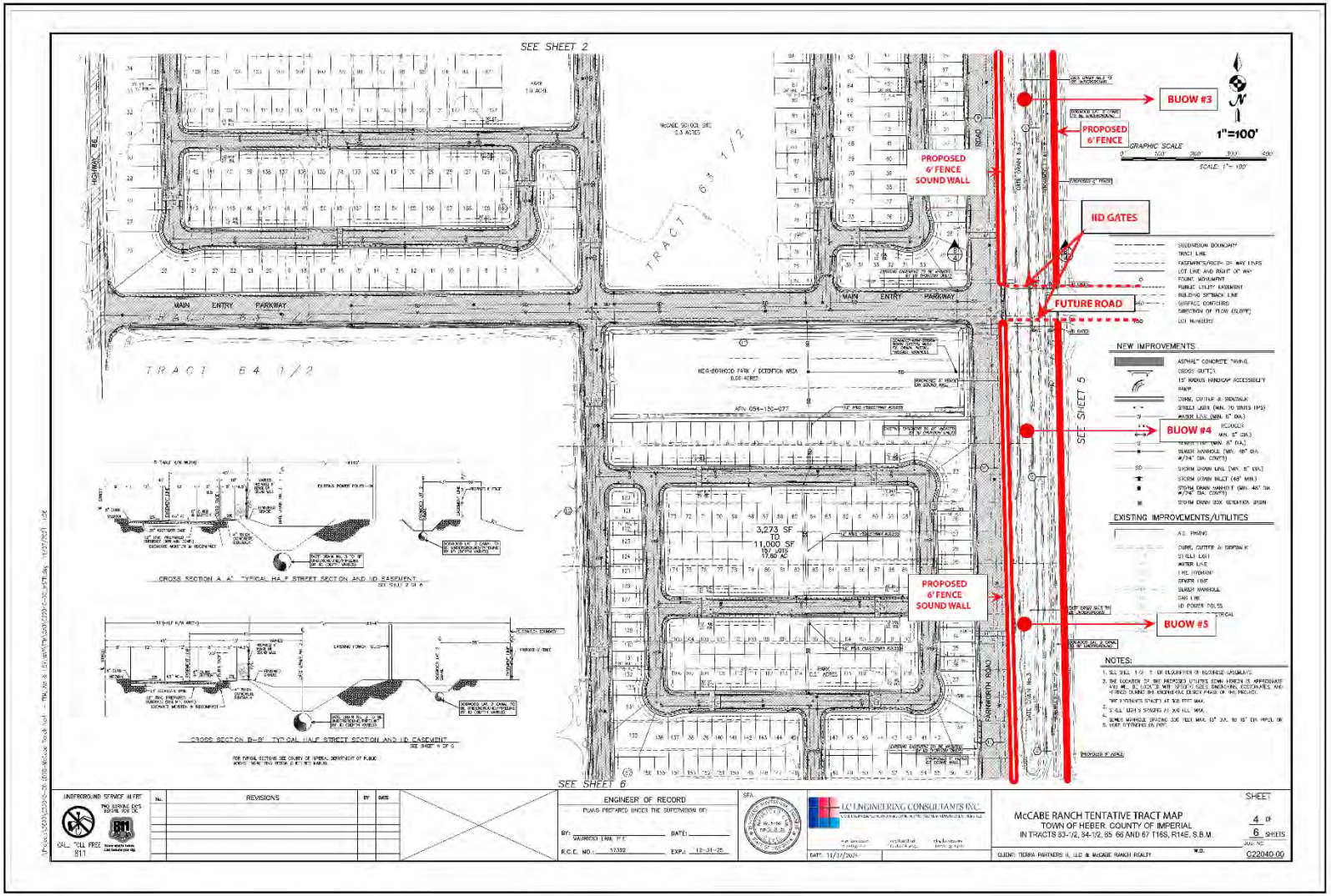

Source: Dubose Design, 2025.

IID Facilities Fencing Alternative - TM 994 Sheet 4 of 6
McCabe Ranch II Tract Map 994 and SPA
Figure 7-2

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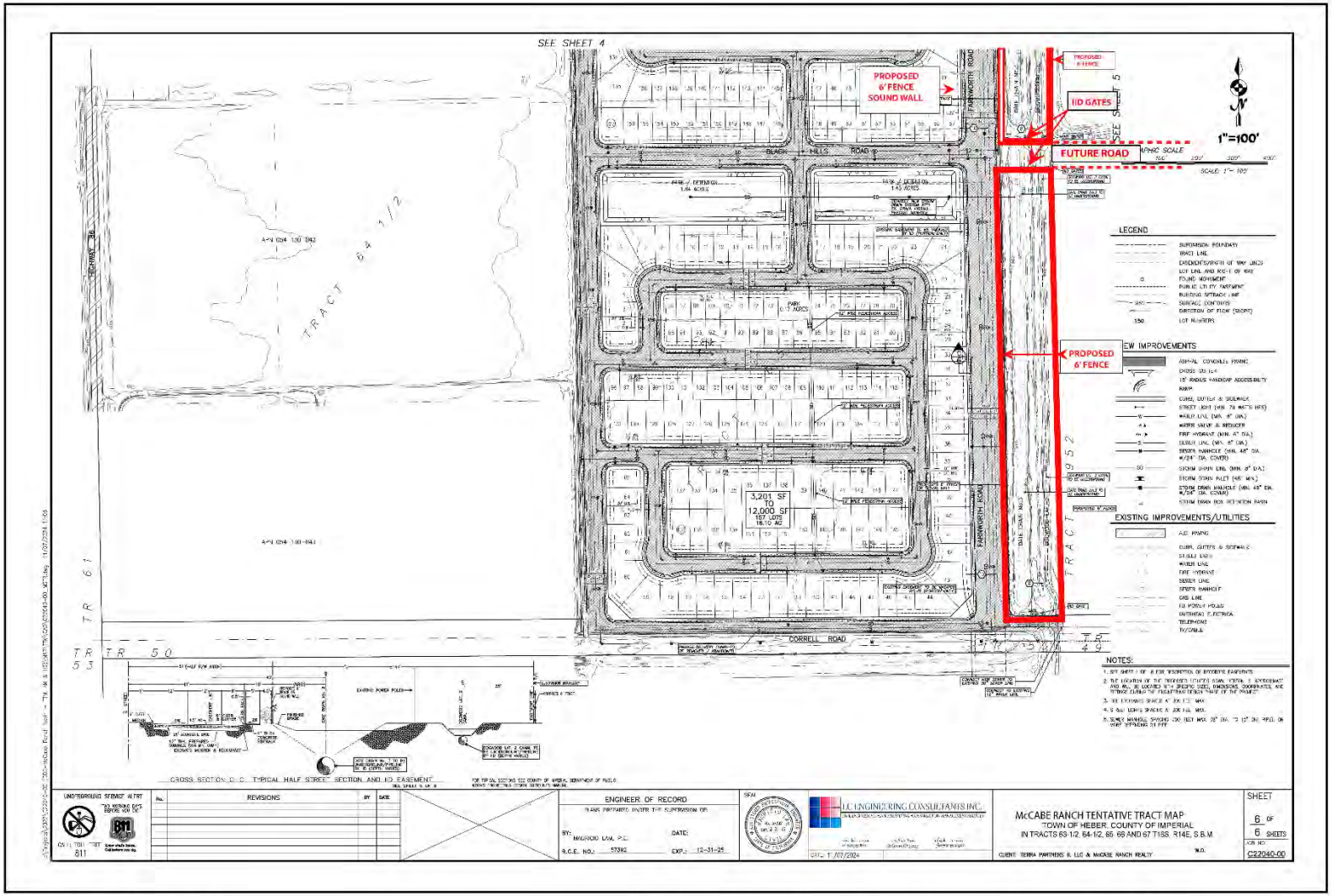

Source: Dubose Design, 2025.

IID Facilities Fencing Alternative - TM 994 Sheet 6 of 6
McCabe Ranch II Tract Map 994 and SPA
Figure 7-3

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8.0 PREPARERS

This Environmental Impact Report was prepared for the County of Imperial by Willis Environmental Planning, 238 Sychar Road, San Diego, CA 92114. The following professionals participated in its preparation:

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8.2. Technical Studies

Air Quality/Greenhouse Gas Report, Energy Memo, Noise Analysis – Birdseye Planning Group

Ryan Birdseye ..... President

Biological Assessment – Barrett Biological Enterprises

Marie Barrett ..... Biologist
Glenna Barrett ..... Biologist

Local Transportation Analysis – Linscott Law & Greenspan

John Boarman ..... P.E.
Renald Espiritu..... P.E.

Water Supply Assessment – Dubose Design Group

Annett Leon ..... Vice President

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None

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None.

8.0 Preparers

None.