Initial Study and Mitigated Negative Declaration (IS/MND) for the Desert Research and Extension Center Engagement Center Project

Prepared For:

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February 2025

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A. *Air Quality, Greenhouse Gas, and Energy Technical Study UC ANR Desert Research and Extension Center Project*, prepared by Ascent Environmental and dated January 2025

B. *UC ANR Desert Research and Extension Center Project – Biological Resources Memorandum*, prepared by Ascent Environmental and dated June 13, 2024

C. *Historic Resources Study, UCD ANR Desert REC Complex, Imperial County, CA*, prepared by JPR Historical Consulting and dated December 19, 2022

D. *Geotechnical Report*, prepared by Landmark Consultants, Inc and dated May 2024.

LIST OF EXHIBITS

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DRAFT IS/MND AND APPENDICES

The Notice of Intent to Adopt (NOI), Draft IS/MND, and Appendices are available for download at the UC ANR's official website.

https://environmentalplanning.ucdavis.edu/uc-anr-desert-rec-engagement-center-project

In addition to the UC ANR's official website, the NOI, Draft IS/MND, and Appendices are also available for review at the Office of Planning and Research's (OPR) CEQAnet online database.

https://ceqanet.opr.ca.gov/

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1. PROJECT INFORMATION

Project title:	Desert REC Engagement Center
Project location:	Desert Research and Extension Center, 1004 Holton Road, Holtville, CA 92250
Lead agency's name and address:	University of California 1111 Franklin Street, 7th Floor Oakland, California 94607-5200
Contact person:	UC Agriculture & Natural Resources ATTN: Brian Oatman 2801 Second Street, Davis, CA 95618 Or via email to: environreview@ucdavis.edu
Sponsor's name and address:	University of California Agriculture and Natural Resources 2801 2nd Street Davis, California 95618 Desert Research and Extension Center, 1004 Holton Road, Holtville, CA 92250
Location of administrative record:	University of California, Davis 255 Cousteau Place Davis, California 95618 environreview@ucdavis.edu

2.0 INTRODUCTION

The Desert Research and Extension Center (REC) Engagement Center Project (herein referenced as the "project") is situated on approximately two and a half acres in the southwestern corner of the existing 255-acre Desert Research and Extension Center (Desert REC), located at 1004 Holton Road just north of E. Evan Hewes Highway and approximately three miles west of the city of Holtville, California and is operated by the University of California (University), Division of Agriculture and Natural Resources (UC ANR). The project proposes the construction of a new Engagement Center within the existing development to support existing programming; refer to Section 3.0, Project Description. In addition to these improvements, the project would protect and enhance existing agricultural research space. Following a preliminary review of the project, UC ANR has determined that the project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Mitigated Negative Declaration addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

2.1 INITIAL STUDY

In accordance with CEQA (Public Resources Code Section 21000-21189) and pursuant to California Code of Regulations Section 15063, the University of California (University), acting in the capacity of Lead Agency under CEQA, is required to undertake the preparation of an Initial Study to determine if the project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no substantial evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the project would not have a significant effect on the environment and shall prepare a Negative Declaration for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Public Resources Code Section 21080(c)).

Section 15063(d) of the CEQA Guidelines require that an Initial Study contain a project description, description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, if any, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

2.2 INITIAL STUDY PROCESS

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed project to determine what level of additional environmental review, if any, is appropriate. As shown in the Determination in Section 6 of this document, and based on the analysis contained in this Initial Study, it has been determined that the proposed project would not result in a significant impact to the environment that cannot be mitigated to a less-than-significant level. The analysis contained in this Initial Study concludes that the proposed project would result in the following

categories of impacts, depending on the environmental issue involved: no impact; less-than-significant impact; or less-than-significant impact with project-specific mitigation measures. The project would result in one potentially significant impact, but a project-specific mitigation measure would reduce this impact to a less-than-significant level. Therefore, preparation of a Mitigated Negative Declaration is appropriate (the Proposed Mitigated Negative Declaration is presented in Section 9).

2.3 PROJECT APPROVALS

As a public agency principally responsible for approving or carrying out the proposed project, the University of California is the Lead Agency under CEQA and is responsible for reviewing and certifying the adequacy of the environmental document and approving the proposed project. Approval of the proposed project will be by the Board of Regents of the University of California (The Regents), or by an approved designee.

3.0 PROJECT DESCRIPTION

3.1 REGIONAL LOCATION

The proposed project would be located at University of California, Agriculture and Natural Resource's (UC ANR) existing Desert Research and Extension Center (REC) in the central portion of Imperial County in Southern California (Exhibit 3-1, Desert REC Location). The Desert REC is one of nine RECs operated by UC ANR.

Imperial County encompasses over 4,284 square miles and has 180,000 residents. It is bordered by Mexico to the south, Riverside County to the north, San Diego County to the west, and the State of Arizona to the east.[1] The climate is hot and dry. The natural vegetation is a sparse growth of quailbrush, creosotebush, inkweed, burage, wingscale, desert buckwheat, and mesquite. However, in 1935 the Hoover Dam was completed and in 1942 the All-American Canal was built, which brough water from the Colorado River to the central portions of the county, now known as the Imperial Valley.[2] The Imperial Valley receives approximately 2.9 million acre-feet of water annually from the Colorado River through the All-American Canal and a series of many laterals managed by the Imperial Irrigation District. Now the Imperial Valley is dominated by agricultural uses. Crops of importance in the area are alfalfa, wheat, barley, cotton, melons, broccoli, cauliflower, lettuce, onions, and sugar beets. The Imperial Valley also has an important cattle-feeding industry.[3]

3.2 ENVIRONMENTAL SETTING

3.2.1 UC ANR REC HISTORY

The UC REC System consists of nine RECs located throughout California's various crop production and climatic zones. The UC ANR system is used by University researchers and educators to advance the knowledge and understanding of agricultural and natural resource systems. With a history dating back to 1912, the system has a rich heritage of contribution to the state's bountiful and productive agricultural and natural resource industries. The REC system is an essential component of the University's continuing commitment to extending the benefits of research to California's citizens.

The REC system has three main purposes:

- To provide University researchers with the opportunity to conduct research in climatic zones and in commodities best suited to their individual research discipline or responsibility.
- To provide University personnel the opportunity to research solutions for important regional problems.
- To extend the results of research to regional clientele and industries so they may put the new information into day-to-day application.

[1] Imperial County. *Welcome to Imperial County.* https://imperialcounty.org/about// Accessed January 27, 2025
[2] UCCE Imperial County. *Imperial County Agriculture*. https://ucanr.edu/sites/Test1/files/96429.pdf. Accessed January 27, 2025
[3] Desert Research and Extension Center. *About Us*. https://drec.ucanr.edu/About_Us/. Accessed January 27, 2025

Each REC offers unique opportunities for research and education and present a wide variety of climate types and elevation levels that parallel the many climate zones and elevations found in California. Some RECs are adapted and equipped to grow tree fruit and vine crops, while other RECs specialize in field and vegetable crops. Still other RECs specialize in livestock production and in natural resource conservation and management. This variety allows researchers to work within the REC system on any of the more than 250 crop commodities grown in the state.

3.2.2 DESERT REC PROJECT SITE

The Desert REC is a 255-acre site (Assessor's Parcel Number 045-420-022-000) located at 1004 Holton Road just north of E. Evan Hewes Highway and approximately three miles west of the city of Holtville, as shown in Exhibit 3-1, Desert REC Location. Desert REC was established in 1912 through cooperative efforts between the University of California, interested citizens, growers, and the Imperial County Board of Supervisors. In the beginning, the Desert REC only encompassed 10 acres and focused on viticulture, agronomy, and citriculture. However, after completion of the All-American Canal, Desert REC started expanding. Now it is 255 acres in size, has 40 buildings, and primarily focuses on research areas including desert agriculture, field crops, alfalfa breeding, vegetable crops, livestock environmental and feedlot management, irrigation and drainage management, and pest management. It is also home to Farm Smart agricultural education program, which has educated approximately 165,000 students since 2001.[4]

The majority of the developed area at the Desert REC is located in a central complex on the northeastern corner at the intersection on Holton Road and Meloland Road; the proposed project will occur within this area only. This area contains paved roads, and public engagement focused facilities, while research, administrative, and operational facilities are located in the middle or back of the site and are connected by dirt roads. The center currently has three access points on Holton Road, each controlled with a gate. The western access is the main entrance and connects to the core administrative uses. The central and eastern access points are used primarily for researcher and operational staff access.

3.2.3 DESERT REC CURRENT OPERATIONS

The Desert REC is also the home of the UC Cooperative Extension office for Imperial County. Together the Research and Extension Center and the UC Cooperative Extension office have approximately 31 members of staff and academics on site all with variable schedules between 6 am and 5 pm. UC ANR's educational classes are held daily during the week and are typically held between 9:00 am and 1:00 pm. Classes will occasionally be held during the evenings or on a Saturday. Classes range from 30 to 50 students and are typically attended by school students, teachers, and community members. School groups typically arrive to the Desert REC site via bus. Currently, Desert REC hosts up to 50 visitors a day, 700 per month (during the school year), and anywhere from 5,800 to 6,600 visitors a year. In the 2022/23 year, there were a total of 155 events/workshops with a cumulative total of nearly 6,000 attendees. The largest event, the Farm to Preschool festival, occurs annually on a weekend and had approximately 1,000 attendees in 2023.[5] Some examples of community programs on site include:

- Educational Programs and Youth Engagement: Teaching gardens can provide hands-on learning opportunities for 4-H, Master Gardeners, and other

[4] Desert Research and Extension Center. *About Us*. https://drec.ucanr.edu/About_Us/. Accessed January 27, 2025
[5] UCD/UCANR Communications, Operational Information. , October 2023

educational programs. Participants can learn about gardening, sustainable agriculture, and horticulture through practical experience.

- Demonstration Gardens: These gardens can showcase different agricultural practices, crop varieties, and gardening techniques. They can serve as living laboratories for research and extension activities.
- Community Engagement: Teaching gardens can be open to the public and serve as a space for community members to learn about gardening, healthy eating, and sustainable agriculture. Workshops and field days can be organized in these gardens to engage and educate the local community.
- Collaborative Events: Teaching gardens can be used as a backdrop for large events and workshops. They can host activities like gardening workshops, plant sales, and agricultural fairs.
- Field trips and Camps: Teaching gardens can be used for youth programs, providing children with opportunities to learn about gardening and nutrition. They can also host events like summer camps or after-school programs.

3.2.4 SURROUNDING USES

The Desert REC is bordered by Holton Road on the south, Meloland Road on the west, the South Central Drain No.4 and Bell Road on the east, and East Alamo Road on the north. The surrounding area is dominated by agricultural uses with scattered rural residences. The closest residences to the Proposed Project are approximately 1,000 feet to the south, 1,100 feet to the northwest, and 1,800 feet to the east. Other notable uses in the area include Rositas Canal and the Alamo River adjacent to the northeast corner, the Holtville Sewer Plant just under a mile and a half to the northeast, an elementary school a mile to the west, and the Barbara Worth Country Club is a mile and a half to the east.

3.3 PROJECT CHARACTERISTICS

3.3.1 NEW ENGAGEMENT CENTER

The Proposed Project will occur entirely within the developed area of the Desert REC site at the northeast corner of the intersection Holton Road and Meloland Road, which is referred to as the Project Site. The Proposed Project would redevelop the southeast corner of the site to transform the space into an Engagement Center, incorporating a combination of indoor event and classroom space, outdoor demonstration gardens and landscapes, as well as other associated uses. This redevelopment includes the following components:

1) Demolition of two buildings at the site: Building 302 and Garage 302. Building 302 is an approximately 1,900 square foot building that was built in 1941; it was formally used as residence but is now vacant. Garage 302 is an approximately 400 square foot detached garage adjacent to Building 302. Garage 302 is currently being used for storage. Exhibit 3-3, Demo Plan shows which buildings will be demolished.

2) Construction of new structures: This consists of two detached building structures under a single roof and a greenhouse. The two buildings will be approximately 6,975 square feet in size and contain classroom, office, and storage areas, as well as bathrooms, an engagement space, and a demonstration kitchen. A new 600 square foot greenhouse will be located in between existing building 301 and the new building. The Proposed Project will also create

an outdoor space with an arrival plaza, an approximately 3,475 square foot covered plaza, and presentation gardens. Refer to Exhibit3-4, Conceptual Site Plan and Exhibit 3-5, Proposed Site Plan.

3) Remodel of Building 301: Building 301 is a 1,950 square foot and a 15-foot clear height structure. The building will be converted to a headhouse, i.e an enclosed building attached to an openair shed, with storage space and a bathroom. The building will be reroofed and repainted or reskinned to match the façade of the new facilities.

4) Minor Site improvments: Minor improvments to the site are proposed. The center driveway (east of the Engagement Center site) will be improved to provide a bus pickup/drop off area and 15 new parking spaces. The driveway will also be paved and widened. Some work at the entrance may also be necessary to improve the connection to E. Holton Drive. . Refer to Exhibit3-4, Conceptual Site Plan and Exhibit 3-5, Proposed Site Plan.

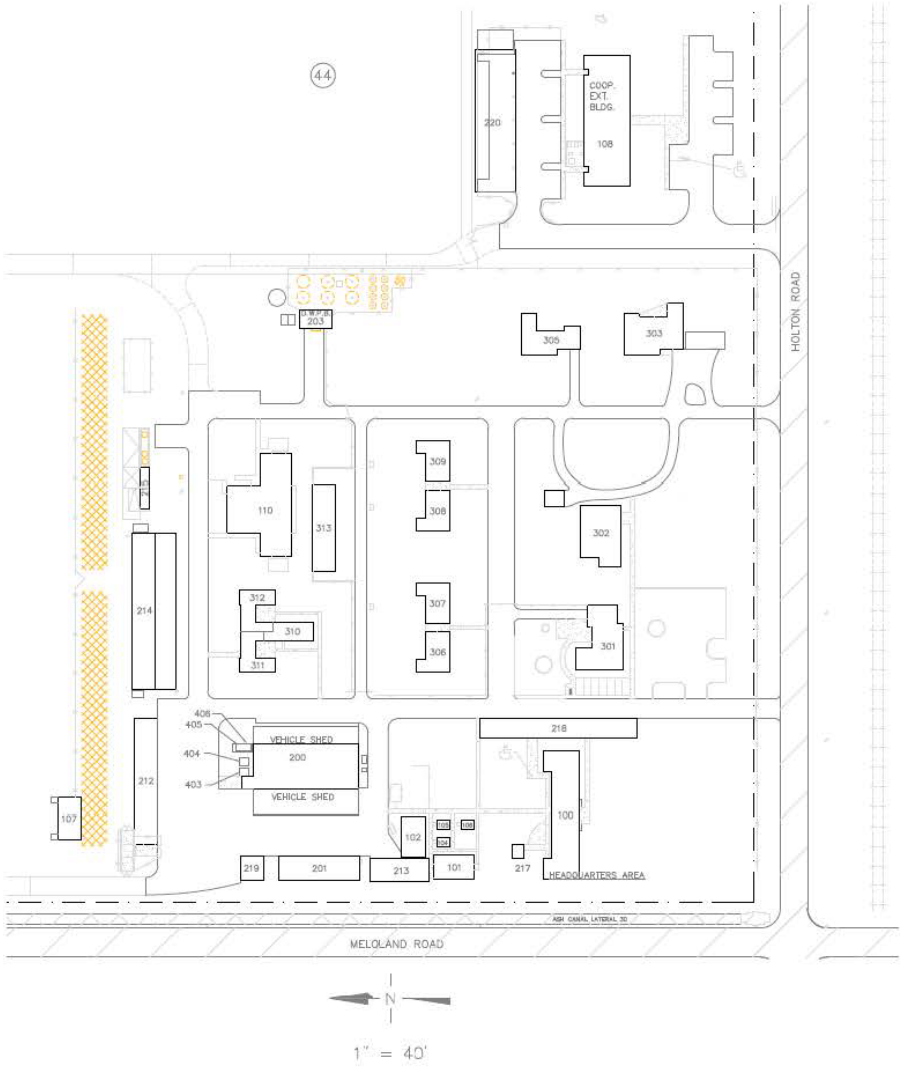
Exhibit 3-1

Desert REC Location

Source: UC Davis, 2023.

Exhibit 3-2

Existing Site Features



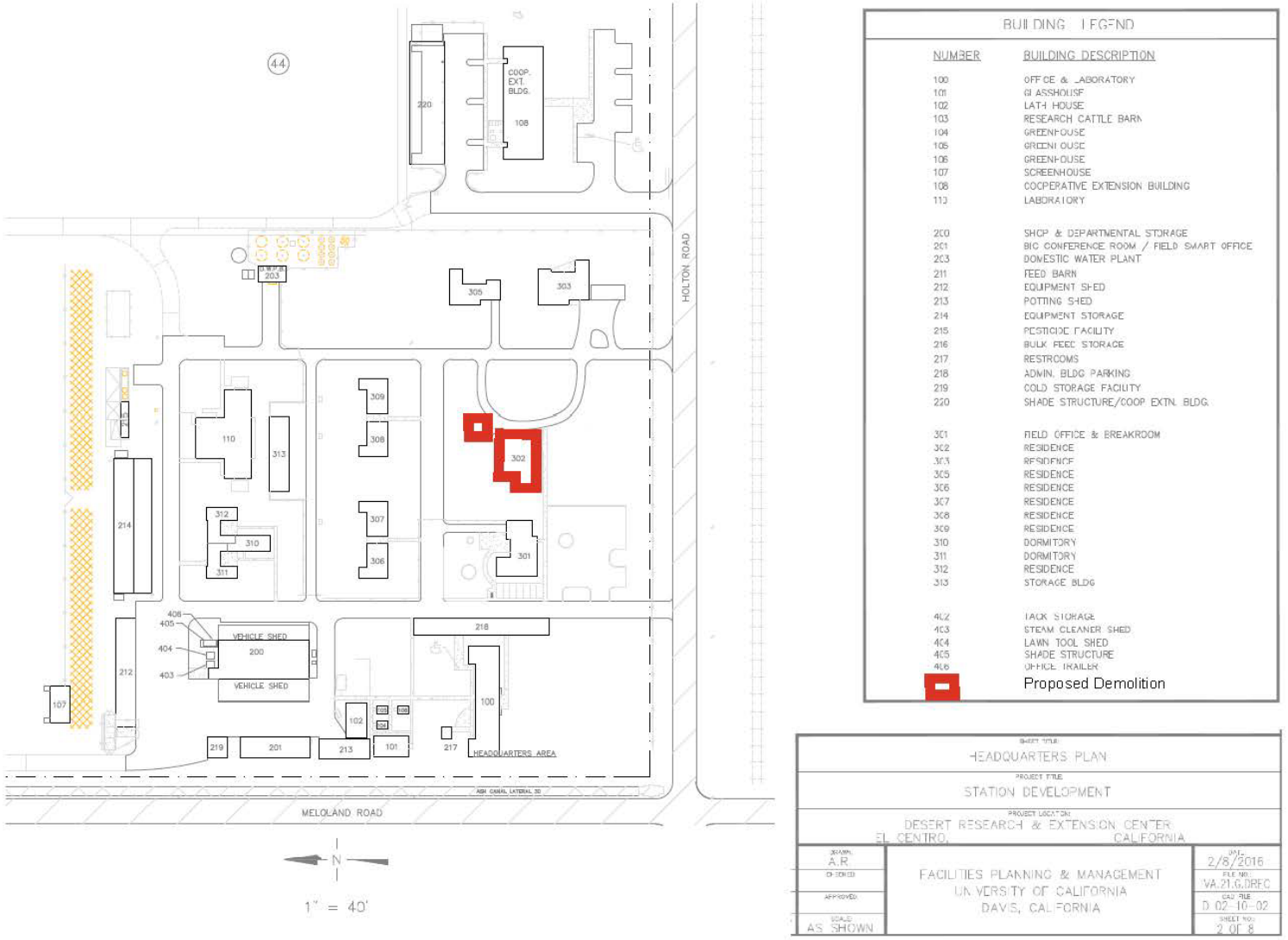
BUILDING LEGEND	
NUMBER	BUILDING DESCRIPTION
100	OFFICE & LABORATORY
101	GLASSHOUSE
102	LATH HOUSE
103	RESEARCH CATTLE BARN
104	GREENHOUSE
105	GREENHOUSE
106	GREENHOUSE
107	SCREENHOUSE
108	COOPERATIVE EXTENSION BUILDING
110	LABORATORY
200	SHOP & DEPARTMENTAL STORAGE
201	BIC CONFERENCE ROOM / FIELD SMART OFFICE
203	DOMESTIC WATER PLANT
211	FEED BARN
212	EQUIPMENT SHED
213	POTTING SHED
214	EQUIPMENT STORAGE
215	PESTICIDE FACILITY
216	BULK FEED STORAGE
217	RESTROOMS
218	ADMIN. BLDG PARKING
219	COLD STORAGE FACILITY
220	SHADE STRUCTURE/COOP EXTN. BLDG.
301	FIELD OFFICE & BREAKROOM
302	RESIDENCE
303	RESIDENCE
305	RESIDENCE
306	RESIDENCE
307	RESIDENCE
308	RESIDENCE
309	RESIDENCE
310	DORMITORY
311	DORMITORY
312	RESIDENCE
313	STORAGE BLDG
402	TACK STORAGE
403	STEAM CLEANER SHED
404	LAWN TOOL SHED
405	SHADE STRUCTURE
406	OFFICE TRAILER

SHEET TITLE: HEADQUARTERS PLAN		
PROJECT TITLE: STATION DEVELOPMENT		
PROJECT LOCATION: DESERT RESEARCH & EXTENSION CENTER EL CENTRO, CALIFORNIA		
DRAWN: A.R CHECKED: APPROVED: SCALE: AS SHOWN	FACILITIES PLANNING & MANAGEMENT UNIVERSITY OF CALIFORNIA DAVIS, CALIFORNIA	DATE: 2/8/2016 FILE NO.: VA.21.G.DREC CAD FILE: D 02-10-02 SHEET NO.: 2 OF 8

Source: UC Davis, Facilities Planning and Management. 2016. Headquarters Plan.

Exhibit 3-3

Demolition Plan



Source: UC Davis, Facilities Planning and Management. 2016. Headquarters Plan.

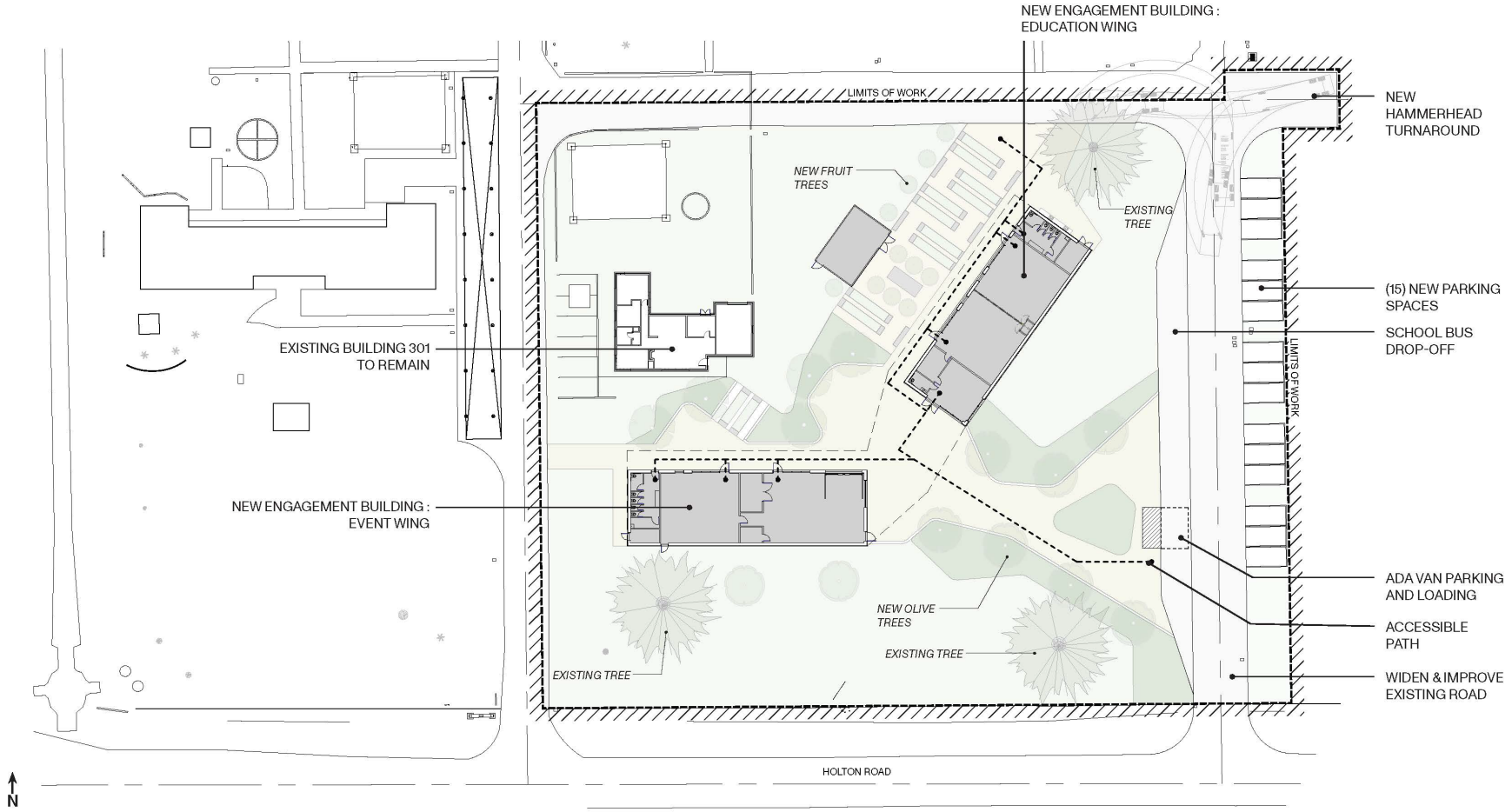
Exhibit 3-4

Conceptual Site Plan

Source: kdA, December 2024, UCANR-DREC Design Review

Exhibit 3-5

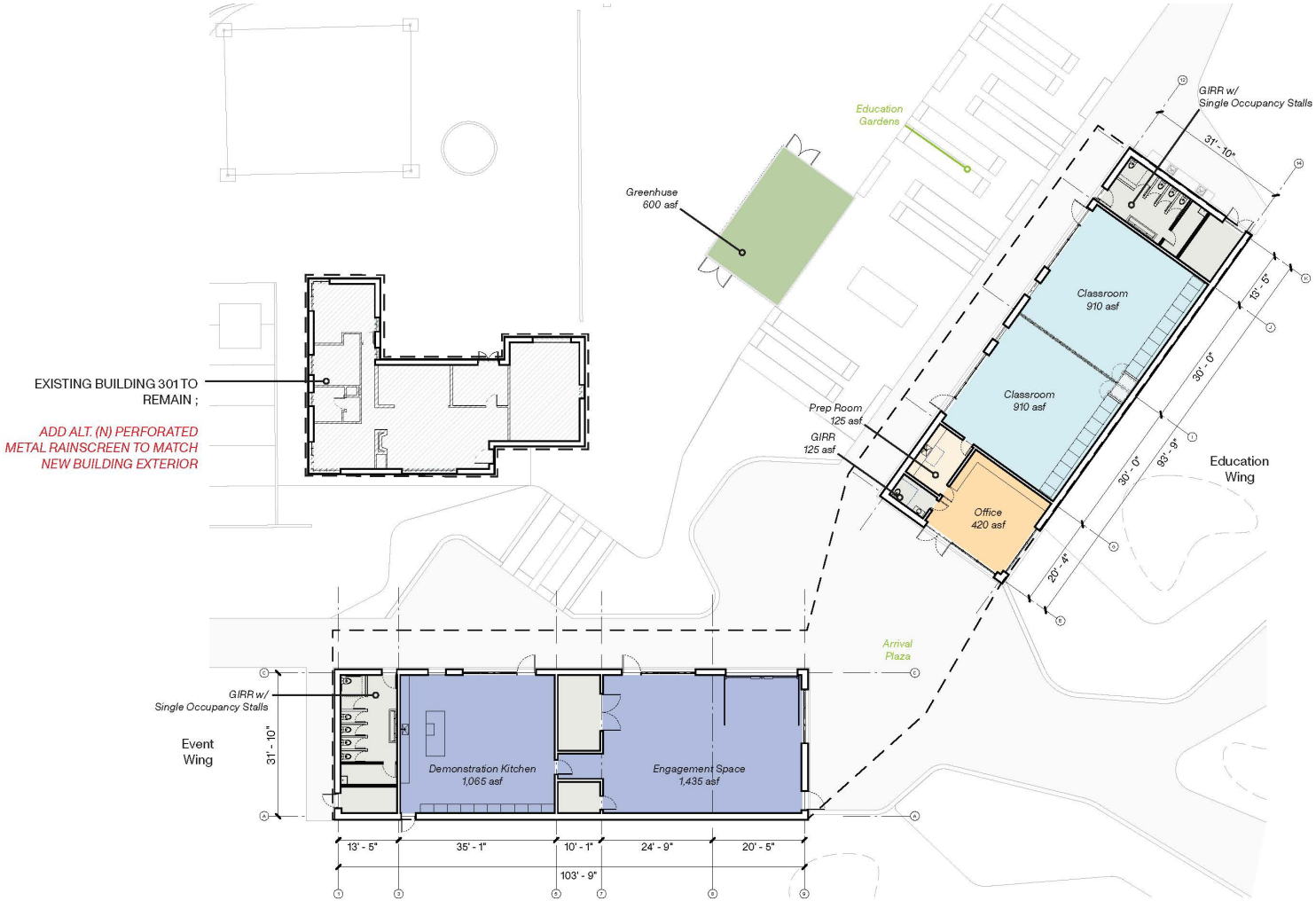
Proposed Site Plan



Source: kdA, January 2025, UCANR-DREC Design Review

Exhibit 3-6

Proposed Floor Plan



Source: kdA, January 2025, UCANR-DREC Design Review

3.3.2 LANDSCAPING

Landscaped areas would be designed to support the research conducted on site (e.g., sustainable landscapes and water conservation). Project landscaping would be native and desert climate appropriate non-native plant species that do not require excessive watering and are low-maintenance and have a clean and compact appearance. Xeriscape landscaping would be used when possible. It is expected that up to ten trees on site may need to be removed. However, more climate-adapted replacement ornamental shade trees would be installed at the new Engagement Center. New landscaping would be intended to enhance comfort in walking, sitting, and gathering. If any new irrigation was needed it would comply with all Model Water Efficient Landscape Ordinance (MWELO) requirements to promote the conservation and efficient use of water. New landscaping would also incorporate drainage control and stormwater management via biofiltration within in-ground planters, bioswales, permeable pavers, and other low-impact design (LID) features.

3.3.3 PARKING AND ROADWAYS

Currently the site is accessed via three gates on Holton Road, with the most western entrance as the main entrance. The Proposed Project will keep all three entrances. The western entrance will still be the main entrance; however, the central entrance will be widened, paved, and connected to the existing internal roads, creating a loop with the western entrance. The central driveway will also be improved with a bus drop off shoulder on the eastern side at the Engagement Center's arrival plaza and 15 new parking spaces on the eastern side. A "hammerhead" turn-around would be added to the top of the central driveway to allow for easier bus and pedestrian turnaround.

3.3.4 UTILITIES AND INFRASTRUCTURE

Utility connections (e.g., water, sewer, electrical, telecommunications), would connect to the existing utilities present along Meloland and Holton Road.

- Water service is provided by the onsite potable water plant via a potable water main and fire flow lines. New buried underground 2 ½ inch potable water and 4 inch fire flow lines will be extended for new on-site taps into existing Center systems and run approximately 100 feet south to new points of connection at the two new buildings and greenhouse. Water is purchased from Imperial Irrigation District and pulled from the canal to the west of the project site.
- Sewer service is provided onsite through an existing on-site septic system that has capacity for the new buildings. A new buried underground 6 inch line will extend from the two new buildings to connect into an existing tap in existing Center sewer main approximately 160' north of new building. Effluent will be conveyed into and treated by an existing on-site septic system.
- Electrical service will be supplied by a new service drop provided by Imperial Irrigation District and will come from an existing transmission line located in Holton Road along the frontage right of way, power will be routed underground at that point and will run parallel to the existing buried service approximately 120 feet north on-site to terminate in service entry at the new buildings.

3.3.5 STORMWATER

Stormwater will be treated onsite through additional stormwater infrastructure. The exact location and design of the stormwater infrastructure will be determined following further hydrologic

investigation during the project design phase. However, it is anticipated that stormwater retention area will be a shallow (4"-6") depression in the front yard of the project, filled with rock or gravel and will operate as a collection and evaporation system rather than an infiltration. Proposed infrastructure would ensure that flow rates off site do not change from existing conditions.

3.3.6 PROPOSED OPERATIONS/POPULATION

The project will accommodate existing operations that occur on site and provide a formalized space to facilitate the various programing provided at the Desert REC. It is assumed that the project could increase employees and on-site researchers from 31 to 34, intern students from 12 to 16 and volunteers from 4 to 10, at any given time. Currently, Desert REC hosts up to 50 visitors a day and anywhere between 5,800 and 6,600 visitors a year. Visitors are typically community members attending workshops or students on field trips that arrive to the site by bus. The new facilities could increase community members visiting the site by up to 20 percent. The new facilities could also provide opportunities to attract external stakeholders (growers groups, educational institutions, non-profits, county agencies) to use these facilities as time permits. This region is very rural and lacks facilities that can carry on community events with concurrent sessions, the proposed Engagement Center at the Desert REC would fill this void and provide a space for possible community-facing events. By developing the Engagement Center, UC ANR seeks to create a multifunctional space that fosters education, research, and community engagement, aligning with the center's mission and the possible increase in facility usage.

3.3.7 SUSTAINABILITY

The project has been designed and would be constructed to meet the University of California – Policy on Sustainable Practices. To comply with this policy and ensure that the Engagement Center is energy efficient and easy to maintain, the development would be designed and constructed to a minimum Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Gold rating. The project would exceed the California Building Code (CBC) energy requirements by at least 20 percent and meet or exceed whole-building energy performance targets per Table 1 of the University of California – Policy on Sustainable Practices. The project would utilize ultra-low flow fixtures, automatic sensor controls, and reduced flow aerators at all new fixtures, to exceed current California Green Building Standards Code—Part 11, Title 24, California Code of Regulations (CALGreen) Water Efficiency measures by 20 percent and as required for LEED Certification. High-efficiency lighting systems would be installed into all buildings, and adaptive light layering would be utilized for task, accent, and ambient lighting to allow lighting levels to be safely reduced under multiple circumstances. Additionally, high-efficiency domestic hot water (DHW) systems would be installed in all buildings.

In accordance with CALGreen standards, the project would include solar facilities either in the form of panels mounted on the roof of the Engagement Center, as a parking shade structure, or panels that also provide shaded growing space for sensitive/high value crop.

3.4 PROJECT CONSTRUCTION

Construction activities are anticipated to occur in one phase totaling approximately 11 months. Demolition of the existing buildings and paving of the site will start in the 1st quarter of 2026, followed by building construction, architectural permitting activities, landscape installation, and

finish paving, would occur for the remaining time. Project is anticipated to be completed in 4th quarter of 2026 or first quarter of 2027.

Construction would mostly occur between the hours of 7:00 am to 7:00 pm Monday through Friday and 9:00 am to 5:00 pm on Saturdays. There could be up to five days of construction to be performed outside of these hours due to critical activities (concrete pouring) during periods of extreme high temperatures.

The primary types of demolition and construction equipment would consist of a crawler tractors, crane, excavators, compactors, concrete saws, forklifts, and utility trenching equipment. A temporary diesel generator may be required for construction sequencing. Project earthwork would be balanced on-site and would not require the export/import of soil. All construction staging and laydown areas would be located within the Desert REC and no off-site staging/laydown areas would be required. It is expected that all staging will occur within the diagonal hatched line denoting the "limits of work: on Exhibit 3-5, Proposed Site Plan.

4.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

The University of California (University) finds that the proposed project WOULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

The University finds that although the proposed project could have a significant effect on the environment, the project impacts were adequately addressed in an earlier document or there will not be a significant effect in this case because revisions in the project have been made that will avoid or reduce any potential significant effects to a less than significant level. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

The University finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT will be prepared. ☐

Signature:	Tu Tran Digitally signed by Tu Tran Date: 2025.02.19 15:40:33 -08'00'
Title:	Associate Vice President, UC ANR
Printed Name:	Tu M. Tran
Agency:	The University of California
Date:	2-19-2025

5.0 INITIAL STUDY CHECKLIST

5.1 BACKGROUND

1. Project Title:

Desert Research and Extension Center (REC) Engagement Center Project

2. Lead Agency Name and Address:

University of California
1111 Franklin Street, 7th Floor
Oakland, California 94607-5200

3. Contact Person:

UC Agriculture & Natural Resources
ATTN: Brian Oatman
2801 Second Street,
Davis, CA 95618
Or via email to: environreview@ucdavis.edu

4. Project Location:

The proposed project is located within the existing University of California (University), Division of Agriculture and Natural Resources (UC ANR) Desert Research and Extension Center (Desert REC). The project site is located at the southwest corner (along E Holtville Road) of the Desert REC, west of the City of Holtville, County of Imperial, California.

5. Project Sponsor's Name and Address:

University of California, Division of Agriculture and Natural Resources
Office of Environmental Planning
2801 Second Street
Davis, California 95618

Desert Research and Extension Center
1004 Holton Road,
Holtville, CA 92250

6. General Plan Designation:

Not applicable. The University is constitutionally exempt from local land use laws and regulations under Article IX, Section 9 of the California Constitution, which includes being exempt from all city and county general plans, as well as community plans and zoning regulations.

7. Zoning:

Not applicable. The University is constitutionally exempt from local land use laws and regulations under Article IX, Section 9 of the California Constitution, which includes being exempt from all city and county general plans, as well as community plans and zoning regulations.

8. Description of Project:

The proposed project would construct a new Engagement Center at the southwest corner of the Desert REC to support existing programming. Refer to Section 3.0, Project Description.

9. Surrounding Land Uses and Setting:

Surrounding land uses in proximity to the project site include agricultural and rural residential uses. Refer to Section 3.2, Environmental Setting, for a specific description of surrounding land uses and development.

10. Other public agencies whose approval is required:

Colorado River Regional Water Quality Control Board (Colorado RWQCB) (Responsible Agency)
- National Pollutant Discharge Elimination System (NPDES) Construction General Permit.

Imperial County Department of Public Works/Colorado River RWQCB (Responsible Agencies)
- Municipal Separate Storm Sewer System (MS4) Permit.

Imperial County
- Encroachment Permit

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

In compliance with Assembly Bill (AB) 52, UC ANR distributed letters notifying each local Native American tribe that requested to be on UC ANR's list for Desert REC for the purposes of AB 52 of the opportunity to consult with UC ANR regarding the proposed project at Desert REC. The letters were distributed by certified mail on November 21, 2023. The 30-day response period for AB 52 consultation concluded on December 21, 2023. UC ANR did not receive any communications or requests for consultation; refer to Section 6.18, Tribal Cultural Resources.

5.2 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

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

5.3 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact With Project-Level Mitigation Incorporated."

☒	Aesthetics	☐	Agriculture and Forestry	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology and Soils	☐	Greenhouse Gas Emissions	☒	Hazards and Hazardous Materials
☐	Hydrology and Water Quality	☐	Land Use and Planning	☐	Mineral Resources
☒	Noise	☐	Population and Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities and Service Systems	☐	Wildfire	☒	Mandatory Findings of Significance

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the *CEQA Guidelines* and used by UC ANR in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is potential for significant impacts indicates the need to analyze the development's impacts more fully and to identify mitigation, which has been completed as part of this evaluation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the project. To each question, there are four possible responses:

- *Potentially Significant Impact*. The project would have impacts which are considered potentially significant, if there is substantial evidence that the project's effect may be significant. If there are on or more potentially significant impacts, an Environmental Impact Report (EIR) will be prepared.

- *Less Than Significant With Project-Level Mitigation Incorporated*. The incorporation of project-specific mitigation measures would reduce an effect from potentially significant to less than significant levels. All project-level mitigation measures are to be described, including a brief explanation of how the measures reduce the effect to a less than significant level.

- *Less Than Significant Impact*. The project would not result in any significant effects. The project impact is less than significant without the incorporation of project-level mitigation.

- *No Impact*. The project would not result in any impact in the category or the category does not apply. Information is provided to show that the impact does not apply to projects like the one involved (e.g., the project falls outside of a fault rupture zone). A conclusion of no impact may be based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

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6.0 ENVIRONMENTAL ANALYSIS

6.1 AESTHETICS

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

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

No Impact. The University is constitutionally exempt from local land use laws and regulations under Article IX, Section 9 of the California Constitution, which includes exemption from all city and county general plans, as well as community plans and zoning regulations. For informational purposes only, review of the *Imperial County General Plan* is included herein as UC ANR has and will continue to work cooperatively with adjacent local communities to pursue cooperative planning, land use compatibility, and consistency with local plans and policies, whenever feasible.

Although visual character varies greatly in Imperial County, it includes natural scenic visual resources such as deserts, sand dunes, mountains, and the Salton Sea. Many of these scenic visual resources are located on Bureau of Land Management (BLM) Land. The site is over 10 miles away from any BLM land. There are no officially designated scenic highways in Imperial County. However, the County has identified four scenic highways/corridors that are eligible for listing based on the scenic resources associated with the Salton Sea, Mountain Springs Grade, and/or remarkable desert characteristics. These resources are not in the vicinity of the project. There are no mapped visual resources or Scenic Highways within, adjacent to, or in the vicinity of the project site.[1,2] The nearest eligible scenic highway is Route 78, situated approximately 32 miles northwest

[1] Imperial County, *General Plan: Land Use Element, Figure A-4, Scenic Highways*, July 2015.
[2] California Department of Transportation, *State Scenic Highway Program – Scenic Highway System Lists*, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed July 3, 2024.

of the project site. No existing public views encompass both the project site and Route 78, due to distance and topography. Therefore, the project would not have a substantial adverse effect on a scenic vista, and no impact would occur.

Mitigation Measures: No mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. As discussed above in question a, there are no eligible or State-designated scenic highways in the vicinity of the project site. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project site is located in a non-urbanized area as defined by the CEQA Guidelines. Therefore, the following discussion addressed whether the project will substantially degrade the existing visual character or qulaity of public views of the site and its surroundings.

CONSTRUCTION

Construction activities are anticipated to occur in one phase for approximately 11 months. During this time, short-term construction activities, construction equipment, and truck traffic may be visible to local roadway travelers along Evan Hewes Highway. Visible activities would include stockpiled soil and materials storage on-site. In addition, views of construction of new buildings would also be observed. However, such activities would be phased as part of the construction process and no single activity would occur during the full 10 months. All visible construction activities would cease upon completion of construction. Further, as discussed in Section 6.3, Air Quality, the project would be subject to the Imperial County Air Pollution Control District (ICAPCD) dust control techniques and adherence to ICAPCD Rule 801 and Regulation VII (which require various actions and the development of a dust control plan for the construction and operational phase; and (2) notification to ICAPCD 10 days prior to the commencement of any construction activity.), which would reduce fugitive dust emissions that would impact scenic quality during construction. Construction-related visual impacts are considered to be temporary, would not substantially degrade the existing visual character or quality of public views and would cease upon completion of construction. Therefore, impacts in this regard would be less than significant.

OPERATIONS

The project site is located approximately 3.5 miles west of the City of Holtville and is highly visible from Evan Hewes Highway. The Proposed Project is within the existing developed area of the UC ANR Desert REC site and is being designed in a way to integrate into the existing Desert REC site. Per the design guidelines, the project will use a desert/earth-tone color palate that includes colors such as tan, mauve, and light earth with accent colors such as darker browns and oranges to blend with the landscape. All buildings at the Desert REC site are one story and do not exceed 20 feet; the proposed engagement center will also be 1 story and 19 feet tall with a 24 foot raised roof over the

covered entry. Therefore, the proposed project would be similar in character to the existing Desert REC and will not substantially degrade the existing visual character or quality of public view of the site. Impacts related to operation would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact.

CONSTRUCTION

Project construction could involve temporary light and glare impacts as a result of construction equipment and materials. However, based on the project's limited construction duration and scope of activities, these sources of light and glare would not be substantial. While the Imperial County noise standards limits construction activities 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, the University is constitutionally exempt from these restrictions. However, to remain consistent with common practices in the area, the project is proposing to stay within these hours of activity for almost the entirety of construction. However, there could be up to 5 days of construction to be performed outside of the above-stated hours due to critical activities (concrete pouring) during periods of extreme high temperatures. Such activities would require preapproval by ANR to ensure that all required protocols are implemented. The closest residence is approximately 1,000 feet away and is on the other side of E Evan Hewes Highway. However, light trespass is still possible during nighttime work. Therefore, in the event that construction lighting is necessary by the contractor, the construction contractor would be required to ensure that any lighting is used in a manner that minimizes potential night lighting impacts to sensitive viewers (Mitigation Measure AES-1). All lighting would be required to be of minimum wattage necessary to ensure worker safety. All fixed position lighting would be required to be shielded, hooded, and directed downward to minimize light spillover and prevent light trespass (direct lighting extending outside the boundaries of the property). A lighting complaint resolution form would be maintained by the construction contractor to record all lighting complaints received and to document the resolution of that complaint. Last, all construction related lighting would be required to be shielded or screened such that it is not visible to surrounding residents. As such, with implementation of Mitigation Measure AES-1, construction-related impacts concerning light and glare would be reduced to less than significant levels.

OPERATIONS

The proposed project is within the existing development of the Desert REC Site. Exterior lighting onsite is currently minimal, and the proposed project would include additional site lighting to provide adequate illumination for pedestrian and vehicular safety and enhancing wayfinding. Per the Design Guidance Package that was prepared for the project, exterior lighting would be designed to minimize glare, prevent light spillover, conserve energy, and prevent excessive nighttime light pollution.[3] Where feasible, smart controls and/or bi-level occupancy controls on outdoor lighting would be incorporated. High-efficiency lighting systems would be installed into all buildings, and adaptive light layering would be utilized for task, accent, and ambient lighting to allow lighting levels to be safely reduced under multiple circumstances. In general, site lighting would be similar

[3] MIG. Engagement Center Design Guidance Package, Desert Research and Extension Center. June 12. 2023.

in character to the existing Desert REC. With adherence to the proposed Design Guidelines for the project, operational impacts due to the addition of light would be less than significant.

The project proposes the construction and operation of a greenhouse. The greenhouse will include lighting to promote plant growth. This lighting would be used at certain times of year to extend growing periods for research purposes. This greenhouse will be surrounded by other buildings and is over 1,000 feet away from any sensitive receptors. The buildings surrounding the greenhouse and the distance to nearby residences will shield the light that emits from the greenhouse and avoid and substantial levels of light trespass onto sensitive receptors. Therefore, impacts are less than significant.

The Desert REC regular hours of operation are 6am to 5pm.The proposed Project does not alter the way in which cars would access the site. As such, new sources of vehicle headlight and glare would be similar in character to the existing condition along E Holton Road. Thus, potential glare from vehicle headlights would be less than significant.

Exterior glare would potentially originate from building materials, such as glass and metal. However, per the Design Guidance Package, the new Engagement Center is envisioned to support the design aesthetic of the Desert REC, while also incorporating lighter colored, albedo roof materials that reduce solar reflectance. All structures would be one story in height, with additional overhangs to increase shade. As such, building glare would be reduced and impacts would be less than significant.

Mitigation Measure:

AES-1: Construction Lighting.

Should the construction contractor determine, and Project sponsor approve that activities outside of the standard 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 require lighting, the construction contractor shall confirm that any lighting is used in a manner that minimizes potential night lighting impacts to sensitive viewers, as follows:

a. All lighting shall be of minimum wattage necessary to ensure worker safety.
b. All fixed position lighting shall be shielded, hooded, and directed downward to minimize light spillover and prevent light trespass (direct lighting extending outside the boundaries of the property).
c. A lighting complaint resolution form shall be maintained by the construction contractor to record all lighting complaints received and to document the resolution of that complaint.
d. All construction related lighting shall be shielded or screened such that it is not visible to surrounding residents.

6.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	***Potentially Significant Impact***	***Less Than Significant Impact With Mitigation Incorporated***	***Less Than Significant Impact***	***No Impact***
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			✓	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			✓	

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

Less Than Significant Impact. The California Department of Conservation, Division of Land Resource Projection manages the Farmland Mapping and Monitoring Program, which prepares, updates, and maintains Important Farmland Series Maps and defines Prime Farmland, Unique

Farmland, and Farmland of Statewide Importance.[1] A s depicted in Exhibit 6.2-1, Farmland Designations, the project site is designated as Urban and Built Up land. The project would not convert areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. Impacts would be less than significant.

Additionally, the Desert REC is a representative site for agricultural and horticultural research operated by UC ANR; it provides educational extension in the form of classes and workshops focused on finding solutions for regional agriculture and natural resource systems. The proposed project would protect and enhance the existing agricultural research and education agriculture space at the Desert REC.

Mitigation Measures: No mitigation is required.

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

No Impact. The University is constitutionally exempt from local land use laws and regulations under Article IX, Section 9 of the California Constitution, which includes being exempt from all city and county zoning regulations. As such, the project does not conflict with any applicable zoning regulations. Furthermore, the project is consistent with existing uses on the site, and will support ongoing agricultural research at the Desert REC. Due to the specific tax-exempt status of the University, land owned by the University is not subject to Williamson Act land use/tax contracts. As such, no Williamson Act contract is recorded on the property, nor would the property be eligible for recordation due to the University's tax-exempt status. Thus, impacts related to a conflict with existing zoning for agricultural use or a Williamson Act contract would not occur.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site and vicinity are not used for forest land, timberland, or timberland production. Further, project implementation would not result in the rezoning of forest land, timberland, or timberland zoned timberland production. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

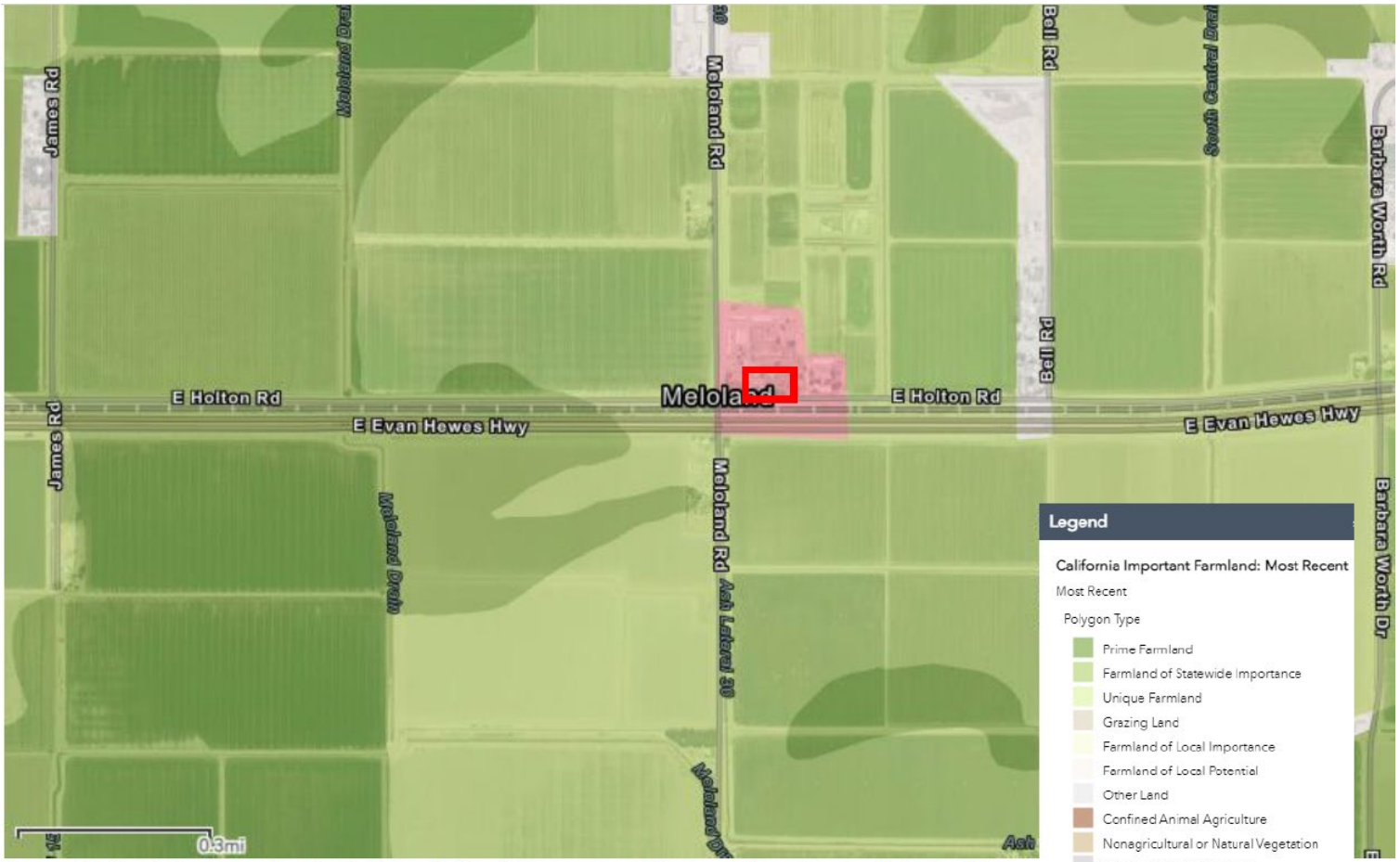
No Impact. As discussed in Response 6.2(c), the project site does not contain designated forest land. Accordingly, the project would not result in the conversion or loss of forest land to non-forest use. Therefore, no impacts would result and no mitigation is required.

Mitigation Measures: No mitigation is required.

[1] California Department of Conservation, *Farmland Mapping and Monitoring Program*. https://www.conservation.ca.gov/dlrp/fmmp. Accessed February 2, 2025.

Exhibit 6.2-1

Farmland Designations



Source: California Important Farmland Finder, California Department of Conservation, Accessed July 24, 2024
https://maps.conservation.ca.gov/DLRP/CIFF/

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

Less Than Significant Impact. The project would not convert farmland to non-agricultural use, and no potential conversion of forest land would occur. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

6.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c. Expose sensitive receptors to substantial pollutant concentrations?			✓	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

The information presented in this analysis is primarily based on the *Air Quality, Greenhouse Gas, and Energy Technical Study, UC ANR Desert Research and Extension Center Project*, prepared by Ascent Environmental and dated January 2025; refer to Appendix A, Air *Quality, Greenhouse Gas, and Energy Technical Study*.

Background:

The project site is located within the Salton Sea Air Basin. Air quality within the project area is regulated by U.S. Environmental Protection Agency (EPA), California Air Resources Board (CARB), and the Imperial County Air Pollution Control District (ICAPCD). Each agency develops rules, regulations, and/or policies to comply with applicable legislation. EPA and CARB have set ambient air quality standards for certain air pollutants to protect public health and welfare. If an area has not achieved the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) for any criteria pollutant, EPA and CARB classify it as a nonattainment area for the respective criteria pollutant. A nonattainment area is required to have an air quality attainment plan (AQAP) to attain and maintain the required standards. These plans are typically developed by the local air district, which for the proposed action is ICAPCD. The ICAPCD is responsible for ensuring that all State and Federal ambient air quality standards are achieved and maintained within the County of Imperial. The County of Imperial is designated as a "non-attainment" area with respect to Federal Standards for both particulate matter (PM10)[1] and ozone.[2] The ICAPCD has developed multiple plans with various control measures to help achieve the attainment for air

[1] Imperial County Air Pollution Control District. 2018a. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter. Available: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/2018PM10PlanBoardPacket.pdf. Accessed August 16, 2024.
[2] Imperial County Air Pollution Control District. 2017a. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard. Available: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/OzoneSIP.pdf. Accessed August 16, 2024.

quality ambient standards[3] The attainment status of criteria air pollutants for Imperial County is shown below in Table 1.

Table 6.3-1
Attainment Status Designations for Imperial County

Pollutant	National Designation	State Designation
Ozone	Nonattainment[1]	Nonattainment
PM_{10}	Attainment (Maintenance)	Nonattainment
$PM_{2.5}$	Nonattainment[2]	Attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment[3]	Attainment
Lead (Particulate)	Attainment[4]	Attainment

Notes: PM_{10}=respirable particulate matter; $PM_{2.5}$=fine particulate matter; CO=carbon monoxide; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.
[1] 2015 Standard
[2] 2012 Standard
[3] 2010 Standard
[4] 2008 Standard
Sources:[4] [5]

The project site is in Imperial County, which is under the jurisdiction of ICAPCD. ICAPCD adopted significant thresholds to assist lead agencies in evaluating and mitigating air quality impacts under CEQA. The ICAPCD thresholds, which are incorporated in the ICAPCD CEQA Air Quality Handbook[6], establish the levels at which emissions of ozone precursors (ROG and NOx), PM, local carbon monoxide, and TACs would cause significant air quality impacts.

Projects with a potential to emit emissions below the Tier I levels shown in Table 2 are not required to develop a Comprehensive Air Quality Analysis Report. Projects with a potential to emit emissions above Tier II levels daily are required to implement all standard mitigation measures and all feasible discretionary mitigation measures. Table 2 summarizes ICAPCD's numerical thresholds of significance for criteria air pollutants.

[3] Imperial County Air Pollution Control District. *State Implementation Plans*. Available: *https*://apcd.imperialcounty.org/planning/#stateplan. Accessed August 15, 2024.
[4] US Environmental Protection Agency. 2024. Nonattainment Areas for Criteria Pollutants (Green Book). Available: https://www.epa.gov/green-book. Accessed August 15, 2024.
[5] California Air Resources Board. 2022. Proposed 2022 Amendments to Area Designations for State Ambient Air Quality Standards Available: https://ww2.arb.ca.gov/rulemaking/2022/2022-state-area-designations-regulation. Accessed December 4, 2023.
[6] Imperial County Air Pollution Control District, 2017. CEQA Air Quality Handbook. Available: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/CEQAHandbk.pdf. Accessed August 16, 2024.

Table 6.3-2
ICAPCD Criteria Pollutant Thresholds (pounds per day)

Phase		ROG	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
Construction		75	100	550	150	NA	NA
Operations	Tier I	<137	<137	<550	<150	<550	<150
	Tier II	>137	>137	>550	>150	>550	>150
Notes: ROG = reactive organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; PM10 = respirable particulate matter; PM2.5 = fine particulate matter; SOx = oxides of sulfur; ICAPCD = Imperial County Air Pollution Control District.							
Source: [7]							

The ICAPCD CEQA Guide does not provide screening criteria for assessing mobile-source CO emissions. In lieu of current guidance related to CO impacts from ICAPCD, CEQA provides lead agencies the discretion to utilize thresholds from other air districts for use in analyses where needed, so long as substantial evidence is provided to explain the use of that threshold in a different region of the state. The Bay Area Air Quality Management District (BAAQMD) offers guidance for evaluating mobile source CO impacts in CEQA documents. BAAQMD's CEQA Guide provides preliminary screening criteria to aid lead agencies in assessing whether a project could result in CO concentrations exceeding the significance threshold. BAAQMD's CEQA guide provides a screening threshold that states that project-generated traffic that would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour would potentially result in a CO impact and would, therefore, require further analysis.

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

Less Than Significant Impact. The growth projections used to develop the Imperial County General Plan assume that growth in population, vehicle use, and other source categories would occur at rates consistent with the rates used to develop the ICAPCD's air quality attainment plans (AQAPs) (see above). The project would result in slightly increased emissions from energy consumption, area sources, and mobile sources. However, as shown in Table 5, below, the resulting emissions from these increases would be well below ICAPCD thresholds. Moreover, the project would incorporate various sustainability features that would reduce emissions over time in line with local, regional, and statewide air quality planning efforts. Therefore, the project would not conflict with or obstruct the implementation of the applicable air quality plan. This impact would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Imperial County is currently designated as nonattainment for the ozone and $PM_{2.5}$ NAAQS and the ozone, and PM_{10} CAAQS. As stated above, under "Thresholds of Significance," an exceedance of an IPCAPCD criteria pollutant threshold for which the region is in

[7] Imperial County Air Pollution Control District, 2017. CEQA Air Quality Handbook. Available: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/CEQAHandbk.pdf. Accessed August 16, 2024.

nonattainment would constitute a significant impact. The following analysis discusses project-generated criteria pollutant emissions and compares them to ICAPCD's numerical thresholds.

Construction

Construction of the proposed project has the potential to create air quality impacts from the use of vehicles and equipment such as heavy-duty construction equipment, construction workers' vehicle trips, and heavy-duty haul truck trips. Construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation, and the prevailing weather conditions for dust. Construction is expected to begin in March 2025 and conclude in December 2025. Additionally, fugitive PM_{10} and $PM_{2.5}$ emission estimates reflect compliance with ICAPCD Regulation VIII and Rule 801, which are mandatory. Construction emissions were modeled in CalEEMod based on a combination of project-specific information the applicant provided and model defaults. Table 3 summarizes the results of the emissions modeling. The table compares maximum daily emissions to ICAPCD thresholds for construction related emissions.

Table 6.3-3

Estimated Maximum Daily Construction Emissions (pounds per day)

Construction Year	ROG	NOx	CO	PM_{10}	$PM_{2.5}$	SO_X
2025	2	20	26	4	2	<1
ICAPCD Thresholds	75	100	550	150	NA	NA
Exceeds Threshold?	No	No	No	No	No	No

Notes: ROG = reactive organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_x = oxides of sulfur; ICAPCD = Imperial County Air Pollution Control District.

Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)

As shown, the proposed project's maximum daily project-related criteria pollutants emissions would not exceed ICAPCD's construction thresholds for any pollutant.

Operations

Operational emissions related to the project were estimated for 2026, as this is the first full calendar year without construction activity. Once fully operational, the proposed project would generate operational emissions associated with new project-generated vehicle trips and area sources such as landscaping and periodic painting. Table 4 provides a summary of modeled project-generated operational emissions.

Table 6.3-4

Estimated Maximum Daily Operational Emissions (pounds per day)

Source	ROG	NOx	CO	PM_{10}	$PM_{2.5}$	SO_X
Mobile	<1	<1	3	<1	<1	<1
Area	<1	<1	<1	<1	<1	<1
Energy	-	-	-	-	-	-
Total	**<1**	<1	3	<1	<1	<1
ICAPCD Tier I Thresholds	<137	<137	<550	<150	<550	<150
Exceeds Tier I Threshold?	No	No	No	No	No	No

Notes: ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_x = oxides of sulfur ICAPCD = Imperial County Air Pollution Control District; lb/day = pounds per day.
Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)

As shown in Table 5, the proposed project's maximum daily project-related criteria pollutants emissions would not exceed ICAPCD's operational thresholds for any pollutant.

Summary
The proposed project would not generate maximum daily criteria pollutant emissions during construction or operation that would exceed ICAPCD's construction or operational thresholds. Therefore, the project would not 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, and the impact would be **less than significant**.

Mitigation Measures: No mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The ICAPCD CEQA Guide states that any development project that is located within proximity to sensitive receptors and where the proposed project either 1) Has the potential to emit toxic or hazardous pollutants or 2) Exceeds the ICAPCD criteria pollutant thresholds for construction and operation of the proposed project, must be referred to the ICAPCD for review. In addition, any proposed industrial or commercial project within 1,000 feet of a school must be referred to the ICAPCD for review. As discussed in Impact AQ-2, the proposed project would not exceed the ICAPCD criteria pollutant threshold during construction or operation. However, the project's construction would potentially emit TAC emissions, which have been analyzed separately below.

Construction
Construction of the project would result in temporary, short-term project-generated emissions of diesel particulate matter (diesel PM), ROG, NOX, CO, and PM10 from the exhaust of off-road, heavy-duty diesel equipment for project construction and demolition activities, soil hauling truck traffic, paving, and other miscellaneous activities. As shown in Table 4, the project would not exceed the ICAPCD significance thresholds for construction emissions.

For construction activity, Diesel PM is the primary TAC of concern. The potential cancer risk from the inhalation of Diesel PM outweighs the potential for all other health impacts (i.e., non-cancer chronic risk, short-term acute risk) and health impacts from other TACs. Based on the emission modeling conducted, the maximum onsite construction-related daily emissions of exhaust PM10, considered a surrogate for Diesel PM and includes emissions of exhaust PM2.5, would be less than 1 pound per day (see Attachment A for detailed model outputs and assumptions).

The nearest receptor to the project site is a single-family residence approximately 1,000 feet northwest of the project site; due to the dispersive properties of diesel PM, concentrations from individual construction sites would be even lower (e.g., a decrease of 70 percent at 500 feet from the source). In addition, off-road heavy-duty diesel equipment would be limited to the construction phase of approximately eleven months and would, therefore, not expose receptors to long-term emissions of TACs. Given the low level of a diesel PM on-site and the short duration of activities, TAC exposure from construction activities would not be considered substantial at these receptors.

Thus, given the temporary (eight months) nature of the construction phase, low concentration of Diesel PM (less than 1 pound per day), and the distance to the nearest receptor, exposure of receptors would be limited in duration and minimal in dose. This impact would be less than significant.

Operations

No stationary sources of TACs are proposed as part of the proposed project. No stationary sources would be associated with project operations, nor would the project attract additional mobile sources that spend long periods queuing and idling at the site. Onsite project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors as the predominant operational emissions associated with the proposed project would be routine maintenance, such as the occasional application of architectural coatings and landscaping activities. Therefore, the project would not be a substantial source of TACs.

Carbon Monoxide Hotspots

Implementation of the project would introduce new vehicle trips, and therefore additional CO emissions, to the project area. This level of trips would contribute CO to the air basin. As stated in the Project Description prepared for the project, currently, the Desert REC currently hosts 50 visitors a day and 700 per month during the school year, and the largest event held at the Desert REC results in approximately 1,000 visitors per day and is only held once per year. Community visitors are expected to increase by up to 20 percent with the implementation of the project. Therefore, it is conservatively assumed that the greatest number of visitors in a single day at the Desert REC following implementation of the project would be 1,200 visitors, or 2,400 one-way trips, on the project's busiest day of the year. As this event is only held once per year, the number of trips on a day-to-day basis throughout the year would be far less. This level of vehicle activity is well below the 44,000 vehicles per hour metric used for evaluating the need for evaluating CO impacts. Thus, a CO hotspot would not result from project implementation. Moreover, CO emissions have historically decreased due to the advent of catalytic converters and progressively more stringent fuel economy standards. No CO hotspots would occur because the project would not meet the applicable screening criteria and the long-term CO attainment designation of the SSAB.

Summary

The proposed project would not exceed the applicable ICAPCD thresholds for Diesel PM during construction or operations. Additionally, the project does not introduce any new stationary TAC source and is not anticipated to result in elevated health risk exposure for sensitive receptors greater than 10 in one million. Lastly, the project would not generate operational vehicle trips that exceed the relevant screening threshold for CO and would thus not impact CO hotspots. Thus, this impact would be less than significant

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The proposed project would introduce odor sources from temporary diesel exhaust emissions into the area during construction but would not introduce any new permanent odor sources. However, construction odors would be temporary, intermittent, and dissipate rapidly from the source.

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source, wind speed and direction, and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they can still be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose a substantial number of people to objectionable odors would have a significant impact.

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project does not include these or similar land uses and, therefore, would not produce objectionable odors.

Odors resulting from the construction of the proposed project are not likely to affect a substantial number of people because construction activities usually do not emit offensive odors. Potential odor emitters during construction include heavy-duty diesel equipment exhaust, asphalt paving, and architectural painting. Odors resulting from the operation of the proposed project are not likely to affect a substantial number of people because the project does not include land uses typically associated with objectional odors.

No major existing sources of odors have been identified in the project vicinity. Project construction and operation are not anticipated to frequently expose nearby sensitive receptors to objectionable odors, so this impact would **be less than significant**.

Mitigation Measures: No mitigation is required.

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6.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			✓	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

The information presented in this analysis is primarily based on the *UC ANR Desert Research and Extension Center Project – Biological Resources Memorandum* (Biological Resources Report), prepared by Ascent Environmental and dated June 13, 2024; refer to Appendix B, *Biological Resources Report*.

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

Less Than Significant Impact With Mitigation Incorporated. A field report and biological habitat assessment was prepared for the project and included a literature review and records search of the

California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), the California Native Plant Society (CNPS) On-Line Inventory of Rare, Threatened, and Endangered Plants of California. and the U.S. Fish and Wildlife Service (USFWS) Critical Habitat and Occurrence Data.

A biological resources survey of the site was conducted and included a habitat assessment for burrowing owls conducted during the breeding (nesting) season in accordance with Appendix C of California Department of Fish and Wildlife's *Staff Report on Burrowing Owl Mitigation*. The biological resources survey area included the project site and a 150-meter buffer area surrounding the project site. Based on the field survey, the overall survey area and project site contain a mixture of agriculture, developed, and disturbed habitat. The project site consists of developed uses (i.e., UC ANR buildings, hardscape and landscaping) surrounded by agricultural fields and concrete-lined canal that runs north to south along Meloland Road. Disturbed habitat is physically disturbed areas with a predominance of nonnative species. Disturbed habitat is present in and around the project footprint and adjacent to Holton Road, East Evan Hewes Highway, and along agricultural access roads.

SPECIAL-STATUS PLANTS AND WILDLIFE

No special-status plant or wildlife species were detected during the biological survey, and there is no potential for special-status plants to occur because the impact footprint consists entirely of developed land. Furthermore, there were no records of occurrences of special-status plants identified in the publicly available datasets reviewed within the project impact footprint.

BURROWING OWL

Burrowing owl use of agricultural areas is known to be extensive throughout Imperial County. However, following a review of publicly available datasets, no historic occurrences or species use of the project site or within a 150-meter buffer area around the project site by burrowing owl were identified, and the habitat assessment did not identify any suitable burrow habitat within the study area. There are no records of occurrences of any other special-status wildlife identified in the publicly available datasets reviewed within the project impact footprint.

On October 10, 2024, the California Fish and Game Commission accepted a petition to list the western burrowing owl under the California Endangered Species Act (CESA) and designated the species as a candidate species. As a candidate species, burrowing owl is afforded the same protections as a listed species under CESA, including prohibition of take of individuals.

Project activities, including vehicle use, ground disturbing activities, and construction crews within close proximity of potential burrows could result in a potentially significant impact on burrowing owls if present. These activities could also result in take of individual burrowing owls. Implementation of Mitigation Measure BIO-1, which relies on guidelines from the California Department of Fish and Wildlife (CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012), would be implemented as part of the project. Any active burrowing owl burrows detected during surveys conducted pursuant to Mitigation Measure BIO-1 shall be avoided using a no-disturbance buffer of 160 feet. No disturbance to burrowing owl burrows shall occur without consultation with CDFW. Therefore, no new or substantially more severe impacts would occur.

A biological survey of the site found no suitable habitat for burrowing owls within the proposed construction footprint. The area has been previously developed and the landscaping and existing buildings are still maintained and utilized by Desert REC staff on a routine basis. While some

suitable burrowing owl habitat is present within the 150-meter buffer area no suitable burrows and/or burrow surrogates were observed. The buffer area is disturbed habitat and agricultural land. Additionally, no burrowing owls or any burrowing owl signs (e.g., bones, feathers, whitewash) were detected. Therefore, burrowing owl would have a low potential to occur on this site and no further protocol surveys are recommended (i.e., breeding and/or non-breeding season protocol surveys).

In accordance with recommendations in the "Staff Report on Burrowing Owl Mitigation" (CDFW 2012), the project is expected to be required to conduct take avoidance surveys for the species prior to initiation of construction activities regardless of the time of year (i.e., during both breeding and non-breeding season). These surveys would occur no less than 14 days prior to initiating ground disturbance activities to ensure that any individual burrowing owls that may be present on the site incidentally would not be adversely affected. Should burrowing owls be identified, avoidance and minimization measures (e.g., buffer establishment) would be developed in coordination with CDFW staff to ensure avoidance of the individual burrowing owls and burrows. Mitigation Measure BIO-1 requires pre-construction clearance surveys be conducted to determine presence/absence of burrowing owls. If the pre-construction clearance surveys detects the presence of burrowing owls, Mitigation Measure BIO-1 requires the implementation of avoidance and minimization measures.

With implementation of Mitigation Measure BIO-1, the project's potential impacts to burrowing owl would be reduced to a less than significant level.

CROTCH'S BUMBLE BEE

Crotch's bumble bee (Bombus crotchii) was designated as a candidate for listing as endangered under the California Endangered Species Act (CESA) by the California Fish and Game Commission on September 30, 2022. In June of 2023, the CDFW released *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, which included information on the habitat and range for Crotch's bumble bee.[1] In California, Crotch's bumble bee's current range includes the Mediterranean region (ecoregion encompassing the greater Central Valley, Sierra foothills and central coast ranges of California south to Mexico), Pacific Coast, Great Valley, and adjacent foothills though most of southwestern California. The Crotch's bee range include some portions of Imperial County, including areas around the Salton Sea and a few discrete locations on the west side of the County. However, the project site is not located within the current range of Crotch's bumble bee. Given that the site is located outside the current range of Crotch's bumble bee and the land cover present is primarily developed with active agriculture in the surrounding areas with limited flowering plant species, the likelihood of Crotch's presence at the Project site would be low and no mitigation measures would be required.

OTHER PROTECTED BIRD SPECIES

Compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) requires that the project must avoid impacts to birds and their active nests during the breeding season (February 1 to September 15). To reduce potential impacts to nesting birds during the nesting bird season, Mitigation Measure BIO-2 requires a pre-construction nesting bird clearance survey be conducted to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. If the nesting bird clearance survey indicates the presence of nesting

[1] CDFW. 2023 (June). The Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Sacramento, CA.

migratory native birds, Mitigation Measure BIO-2 requires buffers to ensure that any nesting migratory native birds are protected pursuant to the MBTA and CFGC.

With implementation of Mitigation Measure BIO-2, the project's potential impacts to special status wildlife species would be reduced to a less than significant level.

Mitigation Measures:

BIO-1: Burrowing Owl Take Avoidance Surveys

A qualified biologist shall conduct the take avoidance survey no more than 14 days prior to the start of construction. A time lapse greater than 14 days between construction activities may require subsequent surveys within 24 hours prior to ground disturbance. If any burrowing owls are detected during the survey(s), the following avoidance and minimization measures shall be implemented:

1. Avoid working within 50 meters (160 feet) of the occupied burrow.
2. Develop and provide a worker awareness training program to be implemented by the qualified biologist to increase the on-site construction crew's recognition of burrowing owl and commitment to avoiding the species.
3. No destruction of any suitable burrow shall occur during the breeding season (February 1 through August 31).
4. Avoid direct destruction of occupied burrows during the nonbreeding season until the burrowing owl has vacated the burrow (determined through monitoring of the burrow).
5. If these measures cannot be implemented, the applicant shall obtain written approval of an accepted plan (written or verbal) from Imperial County and the California Department of Fish and Wildlife (CDFW) before construction continues. The plan shall include:
    a. identification of any artificial burrow sites proposed,
    b. passive relocation methods,
    c. monitoring and management of the artificial burrow site, and
    d. reporting.
6. If burrowing owls are detected during the breeding season (February 1 through August 31), a Burrowing Owl Management Plan shall be written and approved by the Imperial County project manager and CDFW before construction continues. The plan shall include, at a minimum:
    a. measures to protect burrowing owls during grading;
    b. description of passive or active burrowing relocation planned during the nonbreeding season; and;
    c. description of best management practices to implement during construction (e.g., ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms).

BIO-2: Preconstruction Nesting Bird Surveys

If construction activities are scheduled within the nesting bird season (February 1 through September 15 for non-raptors), a qualified biologist retained by UC ANR, or their designee, shall conduct a pre-construction nesting bird survey for avian species to determine the presence/absence, location, and status of any active nests on or adjacent to the proposed project site. A survey buffer area up to 250 feet shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to ensure the reproductive success of birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, a nesting bird survey shall be conducted no more than three days prior to the commencement of project construction if construction occurs between February 1 and September 15. In the event that active nests are discovered, a suitable buffer (distance to be determined by the biologist) shall be established around such active nests, and no construction activities within the buffer shall be allowed until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer dependent on the nest). To further minimize impacts to nesting birds and nesting bird habitat, removal or trimming of on-site vegetation shall be minimized to the extent possible.

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

No Impact. Based on the Biological Resources Report, no riparian habitat or other sensitive natural communities are present within the project site. Additionally, no sensitive habitat communities were observed during the biological field survey. The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive habitat community. No impacts would occur.

Mitigation Measures: No mitigation is required.

c) Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Based on the Biological Resources Report, no aquatic features were observed within the project site. The site does not currently support State or Federally protected wetlands. As such, the project would not involve direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands. No impacts would occur.

Mitigation Measures: No mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that

provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The project site is not located within a known migratory wildlife corridor or native wildlife nursery site.[2] There are no project elements that would restrict wildlife movement through the area. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Existing trees within and along the perimeter of the project site may require removal to accommodate the construction of the project and improve access to the site. Construction of the Engagement Center would entail removal of up to ten trees on site, which would be re-planted at a 1:1 ratio. with more climate-adapted replacement ornamental shade trees. There are no local policies or ordinances in effect protecting biological resources within or near the project site. A less than significant impact would occur.

Mitigation Measures: No mitigation is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site is located within the Imperial Valley, approximately 4 miles from the city of Holtville in Imperial County, and is surrounded by agriculture and croplands. The project site is not located within a designated critical habitat, wildlife refuge, wilderness and wildlife areas, State parks, or other protective designations by Federal and State agencies in the County. In addition, the proposed project site is not located within or in the vicinity of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. With the exception of burrowing owl (*Athene cunicularia*), none of the sensitive species or sensitive habitats listed in the *Imperial County Conservation and Open Space Element* were identified or are expected to occur on-site and no suitable habitat for these sensitive species are located on-site. However, the project site is located within burrowing owl habitat. Burrowing owls are a California Species of Special Concern. Approximately two-thirds of the burrowing owl population in California occurs in agricultural areas in the Imperial Valley. The biological resources survey for potential habitat determined there is no suitable habitat for burrowing owl in the project site. As such, the project would not conflict with any local habitat conservation plans. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

[2]Imperial County, *Imperial County – Baseline Environmental Inventory Report,* June 2015.

6.5 CULTURAL RESOURCES

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		✓		
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			✓	

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

No Impact. As discussed in Section 3.4 of the Project Description, the proposed project will demolish Building 302 and it's associated garage, as well as remodel Building 301. These buildings were built between 1941 and 1948. These buildings were evaluated by JRP Historical Consulting to determine if they met the criteria for listing in the National Register of Historic Places, as well as the California Register of Historical Resources (CRHR) eligibility in accordance with Section 15064.5 of the CEQA Guidelines, using the criteria outlined in Section 5024.1 of the California Public Resources Code. Field surveys were completed on November 15 and 16, 2022. JRP Historical Consulting prepared a report summarizing their findings, dated December 19, 2022, refer to Appendix C, *Historic Resources Study*.

To be eligible for listing in the CRHR, a property must be at least 50 years of age and possess significance at the local, State, or national level, under one or more of the following criteria:

- **Criterion 1.** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- **Criterion 2.** It is associated with the lives of persons important in our past;
- **Criterion 3.** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value;
- **Criterion 4.** It has yielded, or may yield, information important in history or prehistory.

This study concluded that the four buildings do not meet any of the criteria and are not eligible for listing in the NRHP or CRHR, nor are they historical resources for the purposes of the California Environmental Quality Act (CEQA). Furthermore, although not binding on the University of California, the Imperial County General Plan's Conservation and Open Space Element includes a map of areas within a heightened historic period sensitivity in the County (Figure 5 of the General Plan), and according to this map, the project site is not located within an "Area of Heightened

Historic Period Sensitivity." [1] Project implementation would not cause a substantial adverse change in the significance of a historical resource. No impacts would occur in this regard.

***Mitigation Measures*:** No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) for the project site and vicinity; the result of the search was negative. In compliance with AB 52, the UC ANR distributed letters notifying each tribe (identified pursuant to a recommended list of tribes provided by NAHC for the purposes of AB 52 of the opportunity to consult with UC ANR regarding the proposed project. The letters were distributed by mail on November 21, 2023. Notified tribes include Barona Group of the Capitan Grande, Campo Band of Diegueno Mission Indians, Ewiiaapaayp Band of Kumeyaay Indians, Iipay Nation of Santa Ysabel, Inaja-Cosmit Band of Indians, Jamul Indian Village, Kwaaymii Laguna Band of Mission Indians, La Posta Band of Diegueno Mission Indians, Manzanita Band of Kumeyaay Nation, Mesa Grande Band of Diegueno Mission Indians, Quechan Tribe of the Fort Yuma Reservation, San Pasqual Band of Diegueno Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. UC ANR did not receive any communications or requests for consultation.

Much of the Proposed Project site has been previously disturbed through the development of the existing REC site and modern agricultural disturbances in the project area; however, project-related construction could uncover previously undiscovered archaeological resources during excavation into native soil. In the unlikely event that archaeological resources are encountered during ground-disturbing activities, Mitigation Measure CUL-1 would require all project construction efforts to halt until a qualified archaeologist is retained by UC ANR, or its designee, examines and evaluates the find. If the archaeological find is determined to be significant under CEQA, the archaeologist would prepare and implement a data recovery plan, which would include performing technical analyses, report filing with the South Coastal Information Center, and providing the recovered material to an appropriate repository for curation, in consultation with a culturally affiliated Native American if applicable. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be reduced to less than significant levels.

***Mitigation Measures*:**

CUL-1 Cultural Resource Training and Protection

The project's grading and construction plans and specifications shall state that, prior to commencement of any ground disturbing activities, a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology, shall be retained for the proposed project. The archaeologist shall be contracted to conduct a Cultural Resources Sensitivity Training for construction personnel prior to the start of construction activities. The training session shall include a handout and shall focus on how to identify cultural resources encountered during ground-disturbing activities and the procedures to be

[1] Imperial County, *Conservation and Open Space Element,* March 2016. https://www.icpds.com/planning/land-use-documents/general-plan/conservation-and-open-space-element; accessed January 17, 2025.

followed if resources are discovered, including, but not limited to, those outlined below.

In the event that any subsurface cultural resources are encountered during earth-moving activities, all work within 50 feet shall be halted until the qualified archaeologist examines and evaluates the find. The on-site construction supervisor shall redirect work away from the location of the archaeological find. Archaeological resources may consist of prehistoric and/or historical materials. Prehistoric materials can include flaked-stone tools (e.g., projectile points knives, choppers) or obsidian, chert, or quartzite toolmaking debris; cultural darkened soil (i.e., midden soil often containing heat-affected rock, ash, and charcoal, shellfish remains, and cultural materials); and stone milling equipment (e.g., mortars pestles, handstones). Historical materials may include wood, stone, or concrete footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, metal, glass, ceramics, and other refuse. The qualified archaeologist shall oversee the evaluation and recovery of archaeological resources, in accordance with the procedures below and Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2. A record of monitoring activity shall be submitted to UC ANR each month and at the end of monitoring. If the archaeological discovery is determined to be significant under the California Environmental Quality Act, the archaeologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- Perform appropriate technical analyses;
- File any resulting reports with the South Coastal Information Center; and
- Provide the recovered materials to an appropriate repository for curation, in consultation with a culturally-affiliated Native American, if applicable.

Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Due to the level of disturbance in the site vicinity, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, if human remains are found, those remains would require proper treatment in accordance with applicable laws. California Resources Health and Safety Code Section 7050.5 through 7055 describe the general provisions for human remains. Specifically, State Health and Safety Code Section 7050.5 requires if any human remains are accidentally discovered during excavation of a site, the County Coroner shall be notified of the find immediately, and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. As required by State law, if the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains are less than significant.

Mitigation Measures: No mitigation is required.

6.6 ENERGY

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

The information presented in this analysis is primarily based on the *Air Quality, Greenhouse Gas, and Energy Technical Study, UC ANR Desert Research and Extension Center Project*, prepared by Ascent Environmental and dated January 2025; refer to Appendix A, Air *Quality, Greenhouse Gas, and Energy Technical Study*.

REGULATORY FRAMEWORK

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 United States [US] Environmental Protection Agency's [EPA] EnergyStar™ program) and transportation (e.g., fuel efficiency standards). At the state level, Title 24 of the California Code of Regulations sets building energy standards. Further, the State provides rebates/tax credits for installing 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 general and climate action plans (CAPs) policies related to the energy efficiency of new development land use planning and renewable energy sources. Appendix A, *Air Quality, Greenhouse Gas, and Energy Technical Study* includes all Federal and State regulations that apply to the energy analysis; however, the ones that specifically apply to the project are listed below.

California Building Energy Efficiency Standards (Title 24, Part 6 and Part 11)

The State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code) regulates the energy consumption of new residential and nonresidential buildings in California. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, resulting in fewer GHG emissions. The current California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar photovoltaic (PV) on new homes, providing significant GHG savings. The most recent is the 2022 California Energy Code advances the onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar PV system and battery storage standards, and

strengthening ventilation standards to improve indoor air quality. The CEC estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHGs by 10 million metric tons (MMT) of carbon dioxide-equivalent (CO2e) over the next 30 years[1]

CalGreen was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The current version is the 2022 CalGreen Code, which took effect on January 1, 2023. Compared to the 2019 CalGreen Code, the 2022 CalGreen Code strengthened sections pertaining to EV and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CalGreen Code. The CalGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and are used as guidelines by State agencies for meeting the requirements of EO B-18-12.

California Energy Efficiency Action Plan

The 2019 California Energy Efficiency Action Plan has three primary goals for the State: double energy efficiency savings by 2030 relative to a 2015 base year (per SB 350), expand energy efficiency in low-income and disadvantaged communities, and reduce GHG emissions from buildings. This plan provides guiding principles and recommendations related to how the State would achieve those goals. These recommendations include:

- identifying funding sources that support energy efficiency programs,
- identifying opportunities to improve energy efficiency through data analysis,
- using program designs as a way to encourage increased energy efficiency on the consumer end,
- improving energy efficiency through workforce education and training, and
- supporting rulemaking and programs that incorporate energy demand flexibility and building decarbonization.[2]

Regulations Addressing Diesel Equipment

CARB promulgates emission standards for off-road diesel construction equipment of over 25 hp, such as bulldozers, loaders, backhoes, forklifts, and many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel-Fueled Fleets regulation adopted by CARB on July 26, 2007, aims to reduce emissions through the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models (Title 13 CCR Section 2449). The compliance schedule requires full implementation by 2023 in all equipment for large and medium fleets and by 2028 for small fleets. Current rulemaking of this regulation, anticipated to be finalized in 2023, includes additional updates to ensure fleet compliance by requiring public agencies and prime contractors to verify compliance with these fleet requirements annually and to report non-compliant fleets. In addition, starting in 2024, fleets

[1] . 2022. 2022 Building Energy Efficiency Standards. Available: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed September 28, 2023

[2] California Energy Commission. 2019 California Energy Efficiency Action Plan. Available: https://www.energy.ca.gov/filebrowser/download/1900. Accessed September 28, 2023.

will be required to use 99 or 100 percent renewable diesel. The latest amendments were approved by CARB in 2022[3].

In 2004, CARB adopted regulations requiring on-board diagnostic (OBD) systems on all 2007 and later model year heavy-duty engines and vehicles (i.e., vehicles with a gross vehicle weight rating greater than 14,000 pounds) in California. CARB subsequently adopted a comprehensive OBD regulation for the heavy-duty vehicles model in 2010 and beyond. The heavy-duty OBD regulations were updated in 2010, 2013, and 2016 with revisions to enforcement requirements, testing requirements, and implementation schedules. Heavy-duty trucks used during Project construction or operations would be required to comply with the heavy-duty OBD regulatory requirements[4].

The California Standards for Diesel Fuel Regulations require diesel fuel with a sulfur content of 15 parts per million (ppm) or less (by weight) to be used for all diesel-fueled vehicles that are operated in California. The standard also applies to non-vehicular diesel fuel, other than diesel fuel used solely in locomotives or marine vessels. The regulations also contain standards for the aromatic hydrocarbon content and lubricity of diesel fuels.[5] While intended to address emissions from diesel engines, these regulations provide the co-benefit of energy savings in the form of conserving diesel fuel by ensuring that diesel equipment is as efficient as possible.

University of California

In 2003, the University of California Office of the President (UCOP) adopted a comprehensive policy of detailed guidelines for Green Building Design and Clean Energy Standards (now the UC Sustainable Practices Policy), including an annual sustainability reporting requirement. This policy has been revised several times, and the most recent version became effective in April 2024. It commits the UC to implementing actions to minimize its environmental impacts and reduce dependence on nonrenewable energy. The UC Sustainable Practices Policy covers energy-related goals across various areas of sustainable practices, such as green building design, clean energy, climate action, sustainable transportation, sustainable building and laboratory operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, sustainability at UC health, general sustainability performance assessment, health and wellbeing, anti-racism, diversity, equity, and. Policies across these various areas include the following:[6]

Policy A. Green Building Design

1. New Buildings

   a) At a minimum, all new building projects, other than acute care facilities, will be designed, constructed, and commissioned to outperform the California Building Code (CBC) energy-efficiency standards by at least 20% [percent] or meet the whole-building energy performance compliance targets listed in Table 1 of Section V.A.1. Additionally, whenever possible within the constraints of program needs and standard budget parameters, the

[3] California Air Resources Control Board. 2023. Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation.: https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-renewable-diesel-fuel-requirements. Accessed February 20, 2024.
[4] California Air Resources Control Board. 2024 Heavy-Duty Engine and Vehicle Omnibus Regulation Amendments. Available: https://ww2.arb.ca.gov/rulemaking/2023/hdomnibus2023. Accessed August 16, 2024
[5] California Air Resources Board. 2014. The California Diesel Fuel Regulations. Available: https://ww2.arb.ca.gov/sites/default/files/2020-05/unofficial_diesel_regs_3-11-19.pdf. Accessed August 16, 2024
[6] University of California Office of the President. 2024a. University of California – Policy on Sustainable Practices. Available: https://policy.ucop.edu/doc/3100155/SustainablePractices. Accessed August 16, 2024

University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by at least 30% [percent] or meet the whole-building energy performance stretch targets listed in Table 1 of Section V.A.1.

b) New building or major renovation projects must not use onsite fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure). Projects unable to meet this requirement will document the rationale for this decision, as described in Section V.A.1.d.

c) All new buildings will at a minimum achieve a USGBC LEED "Gold." Additionally, whenever possible within the constraints of program needs and standard budget parameters, all new buildings will strive to achieve certification at a USGBC LEED "Platinum" rating. This provision applies to all building projects submitting Preliminary Drawings after January 1, 2024 (per section V.A.1.a.). Projects submitted prior to that date have the option to follow the old standard of achieving LEED Silver and striving for Gold.

d) The University of California will design, construct, and commission new parking structures to achieve, at a minimum, Parksmart "Silver" certification and strive to achieve "Gold" whenever possible within the constraints of program needs and standard budget parameters. This provision applies to all building projects submitting Preliminary Drawings after January 1, 2024 (per section V.A.1.a.).

e) All new building projects will achieve at least five points within the available credits in LEED-BD+C's Water Efficiency and Sustainable Sites: Rainwater Management categories (in support of section III.I.) and prioritize earning waste reduction and recycling credits (per section V.F.)

Policy B. Clean Energy

UC is committed to reducing its greenhouse gas emissions by reducing energy use and switching to clean energy supplies.

1. Energy Efficiency Each location will implement energy efficiency actions in buildings and infrastructure systems to reduce the location's energy use intensity by an average of at least 2% [percent] annually.

2. On-campus Renewable Electricity Campuses and health locations will install additional on-site renewable electricity supplies and energy storage systems whenever cost-effective and/or supportive of the location's Climate Action Plan or other goals.

3. Off-campus Clean Electricity By 2025, each campus and health location will obtain 100% [percent] clean electricity. The UC Clean Power Program first met this standard in 2018, and will continue to provide 100% [percent] clean electricity to participating locations.

4. Transitional Biomethane By 2025, at least 20% [percent] of the natural gas historically combusted on-site at each campus and health location will be biomethane. These biomethane volumes will double by 2030 and then decrease over time as UC's supply contracts expire. UC's use of UCOP-supplied biomethane as a transition fuel to replace fossil gas will conclude before 2040.

METHODOLOGY AND THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines requires the consideration of the energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (Public Resources Code Section 21100, subdivision (b)(3)). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Therefore, impacts related to energy are addressed qualitatively. Estimations of energy consumption are provided for informational purposes. Each impact area was analyzed in the context of existing laws and regulations and the extent to which these existing laws and regulations adequately address and minimize the potential for impacts associated with project implementation.

Fuel consumption for mobile construction and operational sources was estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1 and is provided for informational purposes. Building energy consumption (i.e., electricity), area, landscaping, and water sectors were also estimated using CalEEMod defaults and included for informational purposes. Annual VMT and vehicle trip data were estimated in CalEEMod using model defaults. The results of the CalEEMod modeling are included in Appendix A, *Air Quality, Greenhouse Gas, and Energy Technical Study*.

The following significance criteria are based on CEQA Guidelines Appendix F (energy), under which implementation of the project would have a potentially significant adverse impact if the project would:

- result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; and/or
- conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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

Less Than Significant Impact.

CONSTRUCTION

Energy would be required to construct, operate, and maintain construction equipment and to produce and transport construction materials associated with the construction of the project. The consumption would occur over an approximately eight-month period. The one-time energy expenditure required to construct the physical buildings and infrastructure associated with the project would be nonrecoverable. Most energy consumption would result from the operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks supplying materials and hauling demolition materials off-site. Table 6.6-1, *Construction Energy Consumption* summarizes the estimated fuel needed for construction activities associated with the project.

Table 6.6-1
Construction Energy Consumption

Construction Year	Diesel (Gallons)[1]	Gasoline (Gallons)[2]
2025	6,630	41
Total	**6,630**	**41**

Notes:
1) Diesel gallons include off-road equipment and on-road gallons from worker and vendor trips.
2) Gasoline gallons include on-road gallons from worker trips.

Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)

As shown, project construction would consume 6,630 gallons of diesel fuel and 41 gallons of gasoline. According to the 2022 California Annual Retail Fuel Outlet Report, there were 66 million gallons of gasoline and 30 million gallons of diesel fuel sold in Imperial County in 2022[7]. Diesel and gasoline fuel consumption from construction of the project would account for approximately 0.007 percent of total fuel consumption in the county. Although construction activities would require fuel and other energy sources, these increases would be temporary. Construction contractors strive to complete projects efficiently to meet project schedules and minimize costs. Thus, only the necessary amount of fuel would be consumed. Furthermore, all construction equipment would be subject to applicable regulations relating to diesel equipment (see "Regulations Addressing Diesel Equipment" under Section 4.1.1 in Appendix A). Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, a less than significant impact would occur in this regard.

OPERATIONS

Building Energy Demand

All development under the proposed project would be built to exceed the 2022 California Energy Code requirements by at least 20 percent as required by the UC SPP. The project would, at minimum, be built to the standard requirements of CalGreen 2022. The 2022 California Energy Code requires efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards[8], compared to previous code requirements. All buildings developed under the project would be required to exceed the California Energy Code standards for building energy efficiency by 20 percent.

Implementation of the project would increase electricity relative to existing conditions. However, the project would feature an all-electric design and would not include any natural gas infrastructure. Furthermore, the project removes two older buildings that are not considered energy efficient under today's standards. Table 6.6-2, *Operation Energy Consumption* summarizes the estimated operational energy consumption associated with the project.

[7] 2023. 2022 Power Content Label - Imperial Irrigation District. Available: https://www.energy.ca.gov/filebrowser/download/6033. Accessed August 16, 2024
[8] 2023. 2022 California Annual Retail Fuel Outlet Report Results. Available: https://www.energy.ca.gov/media/3874. Accessed: September 16, 2024.

Table 6.6-2
Operational Energy Consumption

Land Use/Energy Type	Energy Consumption	Units
Electricity	277,475	kWh/year
Notes: kWh/year = kilowatt-hours per year.		
Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)		

Therefore, the project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur in this regard.

Transportation Energy Demand

Commuter trips would make up the majority of VMT associated with the project, with occasional maintenance and delivery trips accounting for the remaining VMT. Table 6.6-3, *Transportation Energy Consumption* summarizes the estimated operational transportation energy consumption associated with the project. Annual VMT associated with the project would be 177,923, resulting in a fuel demand of 6,126 gallons of gasoline and 1,311 gallons of diesel fuel per year.

Table 6.6-3
Transportation Energy Consumption

Construction Year	Diesel (Gallons)[1]	Gasoline (Gallons)[2]
2025	1,311	6,126
Total	**1,311**	**6,126**
Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)		

The key drivers of transportation-related fuel consumption are commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed project. However, the project would provide new on-site bus drop-off lane, bicycle parking spaces, and electric vehicle parking spaces, which would promote alternative mode of transportation and reduce transportation fuel consumption

Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact

Summary

The project would increase energy consumption for temporary construction activities related to vehicle use and material transport. However, construction activities would be temporary and would not increase long-term energy or fuel demand. Construction activities would consume the necessary amount of fuel/energy to complete work efficiently and on time. Once operational, the project would increase transportation and building energy relative to existing conditions but would not consume natural gas. It would also include features that promote energy conservation and efficiency to reduce energy demand, and would promote renewable energy generation which will reduce reliance on fossil-fuel consumption.

According to Appendix F of the State CEQA Guidelines, the means to conserve energy include decreasing overall per capita energy consumption, decreasing reliance on oil, and increasing reliance on renewable energy sources. Project energy consumption for building operations and transportation would support these goals because of existing State laws and requirements and project design that promotes energy conservation. For example, the proposed project would exceed the minimum energy performance standards of the California Building Code, which decreases per capita energy consumption by at least 20 percent. The proposed project would also support per capita energy consumption decreases through grid electricity, which State legislation (e.g., SB 100, SB 1020) requires that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. Additionally, the project would not consume natural gas as part of its operation. The project would not develop uses or involve activities that would conflict with goals of decreasing per capita energy consumption, reliance on oil (petroleum), or increasing uses of renewable energy sources or that would result in wasteful, inefficient, or unnecessary energy consumption. This impact would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less than Significant Impact. As discussed above, relevant plans related to the efficient use of energy include the Energy Efficiency Action Plan, which focuses on energy efficiency and building decarbonization[9], the 2022 Scoping Plan, and the UC Sustainable Practices Policy, which seeks to reduce the UC's impact on the environment by promoting green building design, clean energy, climate action, and sustainable transportation[10].

The 2022 Scoping Plan identified key actions necessary to achieve the state's goals, including moving to zero-emission transportation; phasing out the use of fossil gas for heating homes and buildings; providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars; continued investment in solar powered–infrastructure, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation; and scaling up new renewable energy options that are available or may be available in the future.

The project would, at minimum, comply with the current Building Energy Efficiency Standards and CALGreen. It would incorporate water efficiency measures, such as low-flow toilets, sinks, and showers and efficient laundry washing machines, as well as native and drought-tolerant landscaping, all of which would reduce the energy required to treat, transport, and distribute water. In addition, the project would seek LEED Silver, with possible Gold, certification consistent with the UC Sustainable Practices Policy (Policy A. Green Building Design). The project would eliminate the use of natural gas, be all-electric, and be supplied with 100 percent carbon-free electricity consistent with Policy B (Clean Energy) of the UC Sustainable Practices Policy. Therefore, the

[9] California Energy Commission. 2019 California Energy Efficiency Action Plan. Available: https://www.energy.ca.gov/filebrowser/download/1900. Accessed September 28, 2023.
[10] University of California Office of the President. 2024a. University of California – Policy on Sustainable Practices. Available: https://policy.ucop.edu/doc/3100155/SustainablePractices. Accessed August 16, 2024

construction and operation of the project would not conflict with or obstruct the implementation of relevant energy efficiency plans. This impact would be less than significant.

Mitigation Measures: No mitigation is required.

6.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
2) Strong seismic ground shaking?			✓	
3) Seismic-related ground failure, including liquefaction?			✓	
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on

other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the region. According to the California Department of Conservation's *Earthquake Zones of Required Investigation* (online map), [1] the nearest active fault is the Imperial Fault located approximately 1 mile to the west of the project site, and the Rico Fault located approximately 2.5 miles to the east. The project would be designed using seismic recommendations in accordance with the Alquist-Priolo Special Study Zone Act design standards and engineering practices.

As the project site is not located within an Alquist-Priolo Earthquake Fault Zone, no impacts pertaining to potential rupture of a known earthquake fault would occur.

Mitigation Measures: No mitigation is required.

2) Strong seismic ground shaking?

Less Than Significant Impact. The Imperial Valley region is considered to be a seismically active area. The project site may be susceptible to potentially strong seismic ground shaking because of the proximity to the Imperial Fault Zone (approximately 1 mile away), Brawley Fault Zone and Rico Fault (both approximately 2.5 miles away). A geotechnical report was prepared for the construction of the project, and can be found in Appendix D.

UC ANR minimizes potential ground shaking hazards by:

- Reviewing and approving all draft building plans for compliance with the California Building Code (CBC), which includes specific structural seismic safety provisions;
- Upgrading or replacing existing buildings not adequately prepared to withstand seismic hazards;
- Complying with the *University of California Seismic Safety Policy*, which requires anchorage for seismic resistance of nonstructural building elements such as furnishings, fixtures, material storage facilities, and utilities that could create a hazard if dislodged during an earthquake; and
- Incorporating seismic related emergency procedures into departmental emergency response plans.

The project site would likely experience strong seismic ground shaking during the project's lifetime as expected for the southern California region. Nonetheless, the project would comply with UC ANR's programs and procedures as discussed above to minimize potential ground shaking hazards. Further, a detailed site-specific geotechnical investigation has been conducted by a licensed Professional Geologist during the project design phase, and any recommendations intended to reduce potential ground shaking hazards within the site-specific geotechnical investigation would be required to be implemented in accordance with the CBC. The recommendations from the geotechnical report will be followed to avoid potentially significant impacts from seismic activity.

[1] California Department of Conservation, *Earthquake Zones of Required Investigation*, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed January 28, 2025.

These recommendations include soil replacement with non-expansive soils, the use of flat plate structural mats or grade-beam stiffened floor slabs in the design of foundations to resist expansive forces, and over-excavation of soils around and below building foundations. The geotechnical report also includes recommendations for appropriate concrete mixes for the soil types at the site, the types of reinforcing elements to be used, and structural pavement standards. Upon compliance with existing seismic design requirements of the CBC and other requirements imposed by UC ANR, the project would not directly or indirectly cause potential substantial adverse effects with respect to strong seismic ground shaking, and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

3) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a response to severe ground shaking that can occur in loose soils and near surface ground water. The subject site is located about 1 mile east of the Imperial Fault, 2.5 miles southeast of the Brawley Fault, and about 2.5 miles west of the Rico Fault. Strong ground shaking can be expected for higher magnitude events on these faults. The geotechnical report concluded that the risk of liquefaction induced settlement is low to moderate and potential liquefaction induced settlements of 1½ to 1¾ inches have been estimated for the project site. There is a very low risk of ground rupture and/or sand boil formation should liquefaction occur. The recommendations from the geotechnical report will be followed to avoid potentially significant impacts from seismic activity. These recommendations are summarized above and further described in Appendix (D). As such, impacts pertaining to potential seismic-related ground failure, including liquefaction, would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4) Landslides?

No Impact. Earthquake-induced landslides on steep slopes occur in either bedrock or soils and can result in undermining of buildings, severe foundation damage, and collapse. The project site is located in a flat area with no high or steep slopes. Per the Landslide Susceptibility Map, Figure 3, in the *Imperial County General Plan Seismic and Public Safety Element*, the project site is not located within a landslide activity area; therefore, no impacts are anticipated. As such, no impacts pertaining to landslides are anticipated to occur.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Erosion is a process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur at the project site where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Soil disturbance would temporarily occur during project construction due to earth-moving activities. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via storm water runoff from the project site. However, proposed earthwork/grading activities would be balanced on-site and would not require the export of soil any existing on-site soils. Therefore, the project would not result in the loss of topsoil on-site.

SOIL EROSION DURING CONSTRUCTION

Grading and earthwork activities associated with project construction activities would expose soils to potential short-term erosion by wind and water. Excavation and grading activities for the project would be subject to compliance with requirements under the CBC. Additionally, the proposed project would comply with applicable water quality standards developed by the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCB) for stormwater through required permits, including the National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, which would control pollutants contained in runoff generated from UC properties.[2] Compliance with the NPDES requirements, including the preparation of a Storm Water Pollution Prevention Plan (SWPPP) would reduce the volume of sediment-laden runoff discharging from the site. The SWPPP must list Best Management Practices (BMPs) that the discharger would implement to mitigate potential pollutants in stormwater runoff and the locations of those BMPs at the construction site. BMPs for construction activities may include measures to control pollutants at particular sources, such as fueling areas, trash storage areas, outdoor materials storage areas, and outdoor work areas. The implementation of BMPs would reduce the potential for sediment and storm water runoff containing pollutants from entering receiving waters. Therefore, with compliance with NPDES requirements and the Stormwater General Construction Permit, impacts pertaining to erosion during construction would be less than significant.

OPERATIONS

The proposed project would construct a new Engagement Center at the UC ANR Desert REC, which would include both pervious and impervious surfaces. All pervious surfaces would be landscaped, minimizing erosion potential, or have similar erosion potential as the existing condition. New landscaping would also incorporate drainage control and stormwater management via biofiltration within in-ground planters, bioswales, permeable pavers, and other low-impact design (LID) features. Thus, erosion or siltation impacts as a result of operation of the project would be less than significant. Therefore, development of the proposed project would not increase exposure of on-site soils to soil erosion conditions, compared to the existing condition, during project operations. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project site and surrounding areas are relatively flat, and therefore not susceptible to landslides. A detailed site-specific geotechnical investigation has been conducted by a licensed Professional Geologist. Per UC ANR's programs and procedures, any recommendations intended to minimize potential ground hazards, including subsidence and collapse identified within the site-specific geotechnical investigation would be required to be implemented in accordance with the CBC. Therefore, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

[2] State Water Resources Control Board, *Order No. R8-2009-0030 NPDES No. CAS618030*, 2010.

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

Less Than Significant Impact.

In general, much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderate to highly expansive. The geotechnical report prepared for the project (Appendix D) concluded that the site has clay soils of medium expansion (Expansion Index = 51 to 90) that predominate the near surface soils. The project will follow the recommendations for building and foundation designs recommended in the geotechnical report and in accordance with CBC. Therefore, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. No new septic tanks or alternative wastewater disposal systems would be constructed as part of the project. As discussed in Section 6.19, *Utilities and Service Systems*, sewer service is provided onsite through an existing on-site septic system that has capacity for the new buildings. A new buried underground 6-inch line will extend from the two new buildings to connect into an existing tap in existing center sewer main approximately 160' north of new building. Effluence will be conveyed into and treated by an existing on-site septic system. No other modifications are needed to the onsite septic system. This septic system is permitted by Imperial County and the State Water Resources Control Board; Desert REC operates the septic system in compliance with all standards and requirements. Impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would not occur.

Mitigation Measures: No mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. There are no known unique geological features contained on-site. As described in the project's geotechnical report, the project site is located in the Salton Trough region of the Colorado Desert geomorphic province of southeastern California. The Salton Trough represents the northward extension of the Gulf of California, containing both marine and non-marine sediments deposited since the Miocene Epoch. The Imperial Valley is directly underlain by lacustrine deposits, which consist of interbedded lenticular and tabular silt, sand, and clay. Lake deposits are probably less than 100 feet thick and derived from periodic flooding of the Colorado River which intermittently formed an ancient fresh water lake called Lake Cahuilla. Older deposits consist of Miocene to Pleistocene non-marine and marine sediments deposited during flooding events from the Gulf of California. Sediments from this area have yielded fossilized remains of continental vertebrates, invertebrates, and plants at numerous previously recorded fossil sites in the Imperial Valley.

Project construction would require earthwork, including excavation, grading and trenching. Although unlikely, project construction has the potential to unearth and/or potentially destroy previously undiscovered paleontological resources. This potential impact is considered a significant

impact. However, implementation of Mitigation Measure GEO-1 would reduce the potential impact on paleontological resources to a level less than significant.

Mitigation Measures:

GEO-1: Inadvertent Discovery of Paleontological Resources.

In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground-disturbing activities, work must cease within 50 feet of the discovery and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist shall have knowledge of local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures (2010) for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are found within the project site, the consulting paleontologist shall prepare a paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.

6.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

The information presented in this analysis is primarily based on the *Air Quality, Greenhouse Gas, and Energy Technical Study, UC ANR Desert Research and Extension Center Project*, prepared by Ascent Environmental and dated January 2025; refer to Appendix A, Air *Quality, Greenhouse Gas, and Energy Technical Study*.

Background:

GLOBAL CLIMATE CHANGE

California is a substantial contributor of global greenhouse gases (GHGs), emitting approximately 381.3 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) per year.[1] Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of January 2025, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 426 ppm.[2]

[1] California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2021: Trends of Emissions and Other Indicators,* https://ww2.arb.ca.gov/ghg-inventory-data, accessed February 10, 2024.

[2] Scripps Institution of Oceanography, *The Keeling Curve, Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed February 10, 2024.

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent (CO_2e)[3] concentration is required to keep global mean warming below 2 degrees Celsius (°C), which in turn is assumed to be necessary to avoid dangerous climate change.

REGULATORY FRAMEWORK

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

University of California Policy on Sustainable Practices

The *University of California Policy on Sustainable Practices* (Policy) establishes goals for all the University campuses, five medical centers, and other University properties in nine areas of sustainable practices, including climate protection. The Policy establishes goals in 12 areas of sustainable practices: green building, clean energy, climate protection, transportation, sustainable operations, zero waste, procurement, foodservice, water, health care, performance assessment, and health and well-being. The Policy was most recently revised in April 2024. These revisions replaced the cost threshold over which minor renovations need to be LEED certified, which was based on the State California Construction Cost Index (CCCI), with an equivalent cost threshold that UC Office of the President (UCOP) will set annually that is calculated the same way. The 2024 UC Policy on Sustainable Practices also removed references to carbon offset purchases that are no longer used for policy compliance.

Second Nature Carbon Commitment

The University of California is a signatory of Second Nature's Carbon Commitment, formerly known as the American College and University President's Climate Commitment (ACUPCC). This commitment focuses on reduction of GHG emissions with the goal of reaching carbon neutrality as soon as possible.

Energy Service Unit

Energy Service Unit (ESU) supports the University's diverse asset base and helps to chart a path to carbon neutrality with increased procurement transparency. Program areas include wholesale electric, retail load (e.g., campus energy efficiency and renewable energy), natural gas and biogas procurement and development, management of environmental attributes (e.g., carbon allowances), University legislative and regulatory representation on facility issues, and the purchased utility database.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions

[3] Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05
Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Senate Bill 32
Signed into law on September 2016, Senate Bill (SB) 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

Assembly Bill 1279 (California Climate Crisis Act)
In September 2022, Governor Newsom signed into law AB 1279, or the California Climate Crisis Act. AB 1279 requires the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. The bill requires California to reduce statewide GHG emissions by 85 percent below 1990 levels by 2045, and directs CARB to work with relevant state agencies to achieve these goals and update its Scoping Plan to reflect the 2045 target. In its latest 2022 Scoping Plan Update, CARB set carbon removal/capture targets of 20 MMTCO2e by 2030 and 100 MMTCO2e by 2045. Before the recent passage of AB 1279, California had already indicated it was headed in the direction of net-zero emissions by 2045 after Governor Brown signed Executive Order (EO) B-55-18 in 2018, which established an additional statewide goal of achieving carbon neutrality by 2045.

California Building Energy Efficiency Standards (Title 24)
The *2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24.

CARB Scoping Plan
On December 11, 2008, CARB adopted its *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California will implement to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business-as-usual

(BAU)[4] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan.

Imperial County Air Pollution Control District

The ICAPCD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines when necessary. It is directly responsible for reducing emissions from stationary, mobile, and indirect sources. However, the ICAPCD has not established formal quantitative or qualitative GHG emissions thresholds through a public rulemaking process.

Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of Southern California Association of Governments (SCAG) formally adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments – Connect SoCal* (2020-2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

[4] Based on the Scoping Plan, "Business-as-Usual" (BAU) scenario refers to GHG emissions that would be expected to occur in the absence of existing reductions policies. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the state-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

The most recent RTP/SCS (Connect SoCal 2024) was approved by SCAG's Regional Council in April 2024. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies, and strategies for achieving the region's shared goals through 2050. Connect SoCal 2024 sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures, and policies, will reduce GHG emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the CARB. In addition, Connect SoCal 2024 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 Clean Air Act requirements. These are articulated in a set of Regional Strategic Investments, Regional Planning Policies, and Implementation Strategies. The Regional Planning Policies are a resource for County Transportation Commissions (CTCs) and local jurisdictions, who can refer to specific policies to demonstrate alignment with the RTP/SCS when seeking resources from State or federal programs. The Implementation Strategies articulate priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies.

METHODOLOGY AND THRESHOLDS OF SIGNIFICANCE

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[5,6] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[7]

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5 California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed September 22, 2022.

6 State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf, accessed September 22, 2022.

7 California Code of Regulations Title 14 Section 15064(h)(3).

In 2008, South Coast Air Quality Management District (SCAQMD) developed and recommended two types of GHG thresholds: (1) separate numerical thresholds for residential projects (3,500 $MTCO_2e$), commercial projects (1,400 $MTCO_2e$), and Mixed Use projects (3,000 $MTCO_2e$); or (2) a singular numerical threshold for all non-industrial projects (3,000 $MTCO_2e$). These SCAQMD thresholds were developed using substantial evidence by the SCAQMD GHG Working Group (a group of various resource agencies, cities, counties, utilities, and environmental groups) with the objective of capturing 90 percent of GHG emissions from larger projects above the screening threshold and allowing smaller projects to be implemented without further investigation of possible mitigative elements. Additionally, the long-term goal of Executive Order S-3-05 to reduce statewide GHG emissions to 80 percent below 1990 levels by 2050 formulated the basis of the SCAQMD recommendation, which is also consistent with analysis published by the CAPCOA in its 2008 White Paper on CEQA and Climate Change. SCAQMD's GHG Working Group consensus "clearly states that it is at the lead agency's discretion to apply the appropriate threshold to the project for CEQA review. In other words, SCAQMD's recommendation is that the lead agency will need to decide which threshold is most appropriate."

UC ANR has not adopted a threshold of significance for assessing impacts related to GHG emissions. Similarly, SCAQMD also has not adopted significance criteria or thresholds for assessing GHG emissions that is applicable to the project.

Because neither University of California nor ICAPCD recommend numerical GHG thresholds or guidance based on the statewide GHG target mandated by SB 32 or AB 1279, nor has it adopted a CEQA-qualified CAP consistent with State CEQA Guidelines Section 15185.5(b), numerical thresholds from other air districts may be used to assess project-related GHG impacts. The plan to achieve these statewide GHG targets is the 2022 Scoping Plan. There are two air districts in the state that have issued guidance for addressing GHG emissions in CEQA documents for both construction and operational phases in line with the goals of the 2022 Scoping Plan: The Bay Area Air Quality Management District (BAAQMD and the Sacramento Metropolitan Air Quality Management District (SMAQMD). Both have issued guidance for addressing GHG emissions in CEQA documents, but SMAQMD guidance includes a numerical threshold of significance that can be used to screen out smaller projects from further analysis. According to the SMAQMD CEQA Guidelines, for land use development projects, it is recommended that lead agencies compare the project's estimated construction- and operations-related GHG emissions to the SMAQMD's threshold of significance of 1,100 MTCO2e per year[8] . If the threshold is exceeded, then the project may result in a cumulatively considerable contribution to a significant cumulative environmental impact, and all feasible mitigation is required.

Additionally, as noted above, the UC Sustainable Practices Policy requires each campus to complete a decarbonization study, set interim targets for 2030, 2035, and 2040, and update and adopt its climate action plan for reducing GHG emissions from all scopes 90 percent by 2045 (from a 2019 baseline). Any residual emissions beyond 2045 would be eliminated through carbon removal. Therefore, the project was evaluated with respect to consistency with the UC Sustainable Practices Policy and the 2022 Scoping Plan Update.

8 Southern California Association of Governments. 2023 (March). South Coast AQMD Air Quality Significance Thresholds. Available: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25. Accessed February 20, 2024.

a&b) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases??

Less Than Significant Impact. GHG emissions associated with the project would be generated during both construction and operational activities, which are discussed separately, below. Refer to Attachment A for modeling assumptions and output sheets.

Construction

As stated above, construction-related activities would occur over an eleven -month period and generate GHG emissions from the use of heavy-duty off-road equipment, materials transport, and worker commute trips. Table 1, *Project-Generated Construction Greenhouse Gas Emissions* summarizes modeled emissions for each year and provides an annual average and annual maximum emissions estimate.

Table 6.8-1

Project-Generated Construction Greenhouse Gas Emissions

Construction Year	$MTCO_2e$ per year
2025	157
SMAQMD Screening Threshold	**1,100**
Exceeds Threshold?	**No**

Notes: GHG = greenhouse gas; $MTCO_2e$ per year = metric tons of carbon dioxide equivalent per year; SMAQMD = Sacramento Metropolitan Air Quality Management District

Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)

As shown, the estimated GHG emissions generated by project construction are 157 MTCO2e. This is below SMAQMD's screening threshold of 1,100 $MTCO_2e$.

Operations

Project operation would result in the generation of long-term GHG emissions from energy use (i.e., electricity), vehicle trips, water-related energy consumption associated with water use, and the conveyance and treatment of wastewater and waste-generated emissions from the disposal of solid waste. The project would also exceed the minimum requirements of Title 24 Part 6 by 20 percent as required by the 2024 UC Sustainable Practices Policy (UC SPP) and incorporate solar energy into its design. At a minimum, the project design will be developed to be consistent with the UC SPP, including water efficient fixtures and irrigation, climate-adapted trees and landscaping, energy efficient lighting, and high-efficiency hot water systems. The first year of project operation (i.e., the first full year of project operation following the cessation of construction activities) is assumed to be 2026. Table 6.8-2, *Project-Generated Operational Greenhouse Gas Emissions* summarizes the projected operational GHG emissions.

Table 6.8-2
Project-Generated Operational Greenhouse Gas Emissions

Source	$MTCO_2e$ per year
Mobile	67
Area	<1
Energy	33
Water	2
Waste	1
Refrigerants	<1
Total	**105**
SMAQMD Screening Threshold	**1,100**
Exceeds Threshold?	**No**

Notes: Totals may not add due to rounding; GHG = greenhouse gas; $MTCO_2e$/year = metric tons of carbon dioxide equivalent per year; SMAQMD = Sacramento Metropolitan Air Quality Management District.

Source: Air Quality, Greenhouse Gas, and Energy Technical Study, January 2025 (Appendix A)

As shown, estimated operational emissions would not exceed SMAQMD's screening level of 1,100 $MTCO_2e$/year. As stated above, the project by design would incorporate sustainability into its design, including being fully electric, including energy and water efficiency measures, and solar facilities. Electrical service will be provided by the Imperial Irrigation District, which includes renewable energy sources such as biomass, biowaste, geothermal, hydroelectric, solar and wind. The project includes solar facilities either in the form of panels mounted on the roof of the Engagement Center, as a parking shade structure, or panels that also provide shaded growing space for sensitive/high value crop. These measures would reduce carbon emissions in line with UC and statewide GHG reduction goals. CARB identifies building electrification as a key priority area for the state to target to achieve its GHG reduction goals in the 2022 Scoping Plan. Therefore, the project would demonstrate that it is doing its "fair share" in assisting the state in achieving its long-term GHG reduction targets.

The project would be consistent with the UC Sustainable Practices Policy.The project would result in an increase in emissions relative to existing conditions, pursuant to the UC Sustainable Practices Policy and associated GHG emission reduction commitments. In addition, the implementation of the project would not conflict with the 2022 Scoping Plan.

Summary
The project would incorporate sustainability measures and be subject to the UC Sustainable Practices Policy, which is consistent with the statewide reduction strategy in the 2022 Scoping Plan. Thus, the project would not generate GHG emissions that may have a significant impact on the environment, nor would it conflict with applicable state and regional plans adopted to reduce GHG emissions. The impact would be **less than significant**.

Mitigation Measures: No mitigation is required.

6.9 HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

CONSTRUCTION

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, and transmission fluid), and/or handling/transport of import/export of soils. However, these activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All project construction activities would demonstrate compliance with the applicable laws and regulations by the U.S. Environmental Protection Agency (U.S. EPA), State, County, and the City governing the use, storage, and transportation of hazardous materials/waste, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Contractors are required to implement Best Management Practices (BMPs) to ensure compliance with these regulations. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

OPERATIONS

The project proposes the construction of a new Engagement Center to support existing programs at the Desert REC. No changes pertaining to the use/handling/storage of hazardous substances for the purposes of agricultural production would result from the proposed project, compared to the existing condition. The extent of hazardous materials that would be routinely utilized on-site include basic cleaning products along with pesticides typically used for landscape maintenance. Thus, there is limited potential for activities of this nature to cause a significant hazardous condition. Compliance with applicable laws and regulations by the U.S. EPA and State governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. As such, following compliance with existing Federal, State, and local regulations pertaining to hazardous materials, impacts concerning the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact with Mitigation. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, the hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil, soil vapor, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

CONSTRUCTION

Construction Equipment

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures including proper handling of hazardous materials, refueling vehicles off-site,

maintaining proper storage containers, and installing best management practices (BMPs) that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law including the Hazardous Waste Control Act, California Division of Occupational Safety and Health (Cal/OSHA) requirements, Resources Conservation and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA). Compliance with existing laws and regulations would ensure impacts resulting in significant hazard to the public or the environment through accidental conditions during construction would be less than significant.

Demo Activities

The proposed project proposes to demolish two buildings. These buildings were evaluated for lead-based paint given their age. Trace levels of lead were discovered; however, levels were below the regulatory action level. The buildings are also being evaluated for the presence of asbestos containing materials (ACM), and due to their age and construction, it is assumed that some asbestos is present in flooring materials. Prior to demolition of any buildings, all asbestos materials will be removed and disposed, in accordance with state and federal regulations. Furthermore, the University will comply with Imperial County Air Pollution Control District (ICAPCD) procedures for Asbestos Demolition & Renovation Notification. Therefore, the impact would be less than significant.

Project Site

The Project site has been in agricultural use since the 1910s, and residues of both currently available pesticides and currently banned pesticides, such as DDT/DDE, may be present in near surface soils in limited concentrations. Additionally, various features on the property contain asbestos. The Project would be required to implement Mitigation Measure HAZ-1, which would require that a qualified Professional Engineer evaluate these materials prior to Project construction in the form of a Phase I Environmental Site Assessment, and that appropriate actions be taken to avoid any risk from potential materials.

Conclusion

Overall, with adherence to existing regulations related to hazardous materials and the implementation of Mitigation Measure HAZ-1, the construction related impacts concerning hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials would be reduced to less than significant levels.

OPERATIONS

Refer to Response 5.9(a), above, for a description of long-term operational impacts related to proposed development at the site. Upon adherence to existing regulations related to hazardous materials, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during operations.

Mitigation Measures:

HAZ-1 Phase I Environmental Site Assessment

Prior to demolition and/or vegetation clearing, a qualified professional engineer shall conduct a Phase I Environmental Site Assessment to evaluate for presence and concentration of pesticides and asbestos. If high concentrations of either material are

found on site, the Applicant would be required to adhere to any recommendations given by the professional engineer.

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

No Impact. The project site is not located within one-quarter mile of a school. The closest school, Meadows Union Elementary, is located over 1.5 miles to the west. Thus, no impact would result in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Government Code Section 65962.5 requires the DTSC and State Water Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

According to the California Environmental Protection Agency, the project site is not listed pursuant to Government Code Section 65962.5. [1] Thus, no impact would result in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. There are no airports within 2 miles of the project site. The Imperial County Airport is located approximately 7 miles to the northwest, the Holtville Airport is located approximately 10 miles to the east, and the Calexico International Airport is located approximately 10 miles to the south. Additionally, the project site is not located within the vicinity of a private airstrip or related facilities. Therefore, project implementation would not expose people residing or working in the project area to excessive airport noise levels or safety hazards. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

[1] California Environmental Protection Agency, *Cortese List Data Resources*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed August 7, 2024.

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

Less Than Significant Impact. The Proposed Project would be located within the existing Desert REC site and would not interfere with any emergency response or evacuation plans. The central driveway will need to be closed to be improved and widened; however the Desert REC site has two other driveways and internal connectivity throughout the site will remain. Improvement of the central driveway entrance and construction equipment delivering large components of the proposed facilities may temporarily cause single-lane closures on East Holton Road, but these blockages are expected to be temporary and are not expected to significantly impede traffic flow. Furthermore, East Holton Road runs parallel to East Evans Hewes Highway, so an alternative road is easily accessed immediately to the south. Therefore, less than significant impacts to emergency response or evacuation plans would occur.

Mitigation Measures: No mitigation required.

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

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

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6.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			✓	
4) Impede or redirect flood flows?				✓
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

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

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works

in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The Colorado River RWQCB oversees permits at the Desert REC.

Impacts related to water quality typically range over three different periods: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Similarly, development of the proposed project would have the potential to generate stormwater runoff pollutants during construction and post-construction activities that could significantly impact downstream water quality, if not properly controlled.

CONSTRUCTION

Potential sources of water quality impacts during construction of the proposed project would be from activities associated with grading and paving, building construction, architectural painting, and project earthwork. Pollutants associated with these construction activities that could result in water quality impacts may include soils, debris, other materials generated during site clearing and grading, fuels and fluids associated with construction equipment, and paints and other hazardous materials. These pollutants could impact water quality if washed, blown, or tracked off site.

The proposed project would comply with applicable water quality standards developed by the SWRCB and RWQCB for stormwater through required permits, including the General Construction Storm Water Permit, which would control pollutants contained in runoff generated from the Desert REC.[1] The proposed project would be required to comply with the General Construction Storm Water Permit program, which would require implementation of construction control measures specified in a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) that the discharger would implement to mitigate potential pollutants in stormwater runoff and the locations of those BMPs at the construction site. BMPs for construction activities may include measures to control pollutants at particular sources, such as fueling areas, trash storage areas, outdoor materials storage areas, and outdoor work areas. BMPs are also used during treatment of the pollutants at these particular source areas.

In addition to the BMPs, the SWPPP is required to contain: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

The Imperial Irrigation District has a concrete lined canal (known as Ash Lateral 30) that runs along the western edge of the Desert REC site. This canal is not covered. The construction limits of the project, as shown in *Exhibit 3-5, Proposed Site Plan*, are 200 feet away from this canal; therefore, construction activities do not have the potential to cause runoff into this canal.

Overall, compliance with NPDES requirements and the Construction General Permit, would reduce short-term construction-related impacts to water quality to less than significant levels.

[1] State Water Resources Control Board*, Order No. R7-2009-0009-DWQ NPDES No. CAS000002* 2010.

OPERATION

The project proposes to construct a new Engagement Center, inclusive of surface parking and both ornamental landscaping and landscaped areas to support ongoing research conducted on-site. Stormwater discharges would be regulated by the small municipal separate storm sewer systems Order No. 2013-0001-dwq (Phase II MS4 Permit) Colorado River RWQCB for Imperial County.[2] Stormwater will be treated onsite through additional stormwater infrastructure. The exact location and design of the stormwater infrastructure will be determined following further hydrologic investigation during the project design phase. However, it is anticipated that stormwater retention area will be a shallow (4"-6") depression in the front yard of the project, filled with rock or gravel and will operate as a collection and evaporation system rather than an infiltration. Proposed infrastructure would ensure that flow rates off site do not change from existing conditions. Specific details regarding source control and treatment BMPs for water quality control would be determined during the project design phase. Following compliance with project-specific BMPs consistent with the MS4 Permit, long-term water quality impacts would be less than significant.

Mitigation Measures:

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

No Impact. The proposed project does not require groundwater use. The project purchases water from the Imperial Irrigation District (IID). As discussed in Section 6.19, *Utilities and Service Systems*, IID receives water solely from the Colorado River. Imperial Valley groundwater is highly saline and, for the most part, unusable; IID does not receive or provide any groundwater.[3] No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Soil disturbance would temporarily occur during project construction due to earth-moving activities. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via storm water runoff from the project site.

The project would be subject to compliance with the requirements set forth in the NPDES Stormwater General Construction Permit for construction activities; refer to Response 6.10(a). Compliance with the NPDES requirements, including the preparation of a SWPPP would reduce the volume of sediment-laden runoff discharging from the site. The implementation of BMPs would

[2] Imperial County Department of Public Works, *Stormwater*, https://publicworks.imperialcounty.org/divisions/, accessed January 28, 2025.

[3] Imperial Irrigation District. Frequently Asked Water Questions. https://www.iid.com/water/about-iid-water/faqs#:~:text=IID%20provides%20raw%20Colorado%20River%20water%20and%20has%20no%20jurisdiction,(760)%20482%2D4236. Accessed January 28, 2025.

reduce the potential for sediment and storm water runoff containing pollutants from entering receiving waters. compliance with NPDES requirements and the Construction General Permit will protect any stormwater runoff entering the concrete lined canal to the west of the project site. Therefore, with compliance with NPDES requirements and the Stormwater General Construction Permit, project implementation would not substantially alter the existing drainage pattern of the site during the construction process such that substantial erosion or siltation would occur. Impacts pertaining to erosion during construction would be less than significant.

Stormwater will be treated onsite through additional stormwater infrastructure. The exact location and design of the stormwater infrastructure will be determined following further hydrologic investigation during the project design phase. However, it is anticipated that stormwater retention area will be a shallow (4"-6") depression in the front yard of the project, filled with rock or gravel and will operate as a collection and evaporation system rather than an infiltration. Proposed infrastructure would ensure that flow rates off site do not change from existing conditions. Specific details regarding source control and treatment BMPs for water quality control would be determined during the project design phase. Thus, erosion or siltation impacts as a result of operation of the project would be less than significant.

Mitigation Measures: No mitigation is required.

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. The proposed development would increase impervious areas on site. However, as discussed in Response 6.10(a), the quantity of stormwater discharge under post-development conditions would be similar to existing conditions as the proposed infrastructure would comply with the MS4 permit. Additionally, the project site is not located within areas of potential flooding according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the project area.[4] Therefore, it is not anticipated that the project would increase surface runoff in a manner that would result in on- or off-site flooding, and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Refer to Responses 6.10(a) and 6.10(c)(1), above. The proposed development would increase impervious areas on site, but the quantity of stormwater discharge under post-development conditions would be similar to existing conditions upon compliance with regulations of the MS4 permit. Therefore, the development is not expected to exceed the capacity of the existing/planned stormwater drainage systems. Thus, impacts pertaining to the capacity of the stormwater drainage system would be less than significant.

Mitigation Measures: No mitigation is required.

[4] Federal Emergency Management Agency, *Flood Insurance Rate Map #06025C1750C*, effective September 26, 2008.

4) Impede or redirect flood flows?

No Impact. According to the FEMA Flood Insurance Rate Map for the project area, the project site is located outside of the 100-year flood zone and is an area that is considered an area of minimal Flood Hazard.[5] As such, no flood flow related impacts would result.

Mitigation Measures: No mitigation is required.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

As discussed above, the project site is not located in a flood hazard zone. The Salton Sea is over 25 miles to the north and poses a very low risk of inundation. Further, the project site is not located in proximity to any enclosed body of water and is located over 100 miles east of the Pacific Ocean. As such, no impact would occur pertaining to flood hazard, tsunami, or seiche zones.

Mitigation Measures: No mitigation is required.

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

No Impact. As discussed in Response 6.10(b), the proposed project does not require groundwater use. Furthermore, the project site is not located within an area with a required groundwater sustainability plan.[6] Thus, the project is not subject to the requirements of a groundwater sustainability plan. The proposed project would comply with the Storm Water Management Plan and NPDES permit. Therefore, in compliance with the applicable plans and permits, the proposed project would not conflict with a water quality control plan or groundwater management plan. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

[5] FEMA. National Flood Hazard Layer FIRMette, 115°27'5"W 32°48'35"N, Exported January 28, 2025.

[6] Department of Water Resources, *Groundwater Sustainability Plans.* https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Groundwater-Sustainability-Plans, accessed January 28, 2025.

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6.11 LAND USE AND PLANNING

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓

a) Physically divide an established community?

No Impact. A significant impact could occur if implementation of the project would result in physical barriers that change the connectivity between areas of a community to the extent that persons are physically separated from other areas of the community. The project site is located within the developed area of the Desert REC. The project proposes the demolition of two onsite structures and the construction of a new Engagement Center. The proposed project would support existing programming at the Desert REC and would not disrupt the land use pattern of the surrounding community, either on- or off-site. One driveway would be improved, but no roadways, driveways, bikeways, or pedestrian pathways would be altered or removed as part of the project, and no separation of uses or disruption of access between land use types would occur. As such, the proposed project would not physically divide an established community. Therefore, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site is located in the Desert REC, which is managed by the University and serves as a representative site for agricultural and horticultural research. As an entity of the University, the Desert REC is not subject to municipal regulations such as general plans or municipal codes. The new Engagement Center would support existing programming at the Desert REC and would be consistent with the land management practices of the Desert REC. Therefore, the proposed project would not conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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6.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

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

No Impact. There are no locally important mineral resources underlying the project site.[1] As such, implementation of the proposed project would not result in the loss of availability of a known mineral resource of value in the State, region, or local area. No impact would occur.

Mitigation Measures: No mitigation is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. There are no mineral recovery sites within nor adjacent to the project site.[2] Thus, the project would not result in the loss of a locally important mineral resource recovery site.

Mitigation Measures: No mitigation is required.

[1] Imperial County General Plan, Conservation and Open Space Element, 2016.
[2] Imperial County General Plan, Conservation and Open Space Element, 2016.

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6.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately three dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10 p.m. and 7 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there

are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

REGULATORY FRAMEWORK

The University of California is constitutionally exempt from local governments' regulations, such as city and county general plans, land use policies, and zoning regulations, whenever using property under its control in furtherance of its educational purposes. As such, the University will not consider local policies and regulations in its evaluation of the environmental effects of the proposed project unless the University expressly decides to use a local policy or regulation as a threshold or standard of significance. For the purposes of CEQA, UC ANR considered using Imperial County's noise standards from the municipal code where the project is and adjacent noise sensitive receptors may be located. The Imperial County noise standards are therefore described below and are used where appropriate in this analysis as thresholds of significance to determine impact significance.

Imperial County General Plan

Imperial County's General Plan Noise Element identifies sources of noise and provides objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. As shown in Table 6.13-1, *Imperial County Noise Element Property Line Noise Limits*, the County limits the noise level from any noise generating property to 50 dBA between 7 a.m. and 10 p.m. and to 45 dBA between 10 p.m. and 7 a.m. at the nearest residence and to 60 dBA between 7 a.m. and 10 p.m. and to 55 dBA between 10 p.m. and 7 a.m. at nearest commercial properties.

Table 6.13-1
Imperial County Noise Element Property Line Noise Limits

Zone	Time	Applicable Limit One hour Average Sound Level (Decibels) 30 min
Residential Zones	7:00 a.m. – 10:00 p.m.	50
	10:00 p.m. – 7:00 a.m.	45
Multi-residential Zones	7:00 a.m. – 10:00 p.m.	55
	10:00 p.m. – 7:00 a.m.	50
Commercial Zones	7:00 a.m. – 10:00 p.m.	60
	10:00 p.m. – 7:00 a.m.	55
Light Industrial/Industrial Park Zones	Any time	70
General Industrial Zones	Anytime	75
Note: When the noise-generating property and the receiving property have different uses, the more restrictive standard shall apply. When the ambient noise level is equal to or exceeds the Property Line noise standard, the increase of the existing or proposed noise shall not exceed 3 dB Leq.		
Source: Imperial County, *Noise Element*, https://www.icpds.com/assets/planning/noise-element-2015.pdf, Accessed January 14, 2025.		

Construction Noise

The Noise Element exempts construction noise from the above standards, provided construction activities occur between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday and construction noise does not exceed 75 dBA Leq averaged over 8 hours. No construction activities shall be permitted on Sundays and federal holidays.

EXISTING CONDITIONS

Sensitive Receptors

Sensitive populations are more susceptible to the effects of noise than are the general population. Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, rest homes, rehabilitation centers, long-term care and mental care facilities. Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present. Land uses less sensitive to noise are business, commercial, and professional developments. Noise receptors categorized as being least sensitive to noise include industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, and transit terminals. These types of land use often generate high noise levels. Moderately sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, and outpatient clinics.

The Proposed Project location is in a rural agricultural area; however, there are sensitive receptors intermittently dispersed in the area. The closest sensitive receptors are single-family residences. The closest residences are approximately 1,000 feet to the south, 1,100 feet to the northwest, and 1,800 feet to the east of the project site. There is another building 500 feet to the south of the project site; however, this is being used as a retail store and is not considered a residence.

Agricultural Sources

The project site is located within a rural agricultural area. The Imperial County General Plan states that "noise sources associated with agricultural operations include the field machinery, especially when diesel engine driven; heavy trucks, used for the delivery of supplies and the distribution of products; and aircraft, used for the spraying of crops."

Mobile Sources

Most of the existing noise near the project area is generated from vehicular sources traveling along East Evan Hewes Highway. East Evan Hewes Highway is Old Highway 80 and is considered a principal roadway in Imperial County, which is assumed to fall under the State Highway or Prime Arterial Roadway Classification. The Noise Element indicates that areas within specific distances of various types of roadways are considered Noise Impact Zones. Table 6.13-2, *Transportation Noise Impact Zones* provides the distance from each type of roadway. The entire project site is within 500 feet of East Evans Hewes Highway and is considered to be within a Noise Impact Zone. A Noise Impact Zone is an area that is likely to be exposed to significant noise.

Table 6.13-2
Transportation Noise Impact Zones

Roadway Classification	Distance from Centerline- feet
Interstate	1,500
State Highway of Prime Arterial	1,100
Major Arterial	750
Secondary Arterial	450
Collector Street	150
Note: A Noise Impact Zone is an area that is likely to be exposed to significant noise. The County of Imperial defines a Noise Impact Zone as an area which may be exposed to noise greater than 60 dB CNEL or 75 dB Leq(1).	
Source: Imperial County, *Noise Element*, https://www.icpds.com/assets/planning/noise-element-2015.pdf, Accessed January 14, 2025.	

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

Less Than Significant Impact with Mitigation.

CONSTRUCTION

Short-Term Construction Noise Impacts

Construction for the proposed project would involve the use of heavy equipment and would generate construction noise in the project vicinity. Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. The project involves construction activities associated with grading (including filling of the existing agricultural irrigation pond), building construction, paving, and architectural coating applications. The project would be constructed over a duration of approximately 10 months. Ground-borne noise and other types of construction-related noise impacts typically occur during the initial grading phase, which has the potential to create the highest levels of noise. In addition, it is likely the multiple pieces of equipment would be operational at the same time during the construction of the proposed project.

The Federal Highway Administration has a construction noise handbook that provides typical noise levels associated with various types of construction equipment. Assuming multiple pieces of construction would be used at a time, Table 6.13-3, *Typical Construction Activity Noise Levels* shows estimated noise levels from a variety of construction activities that could occur.

Table 6.13-3
Typical Construction Activity Noise Levels

Construction Activity	Assumes the following Equipment	Combined L_{max} at 100 Feet	Combined L_{eq} at 100 Feet
Demolition	Tractor, Concrete Saw, Excavator	85	79
Site Preparation	Excavator, Dump Truck, Backhoe	78	74
Grading	Dozer, Grader, Compactor	82	78
Building and Utilities	Crane, Forklift, Concrete Pump	81	76
Architectural Coating	2 Air Compressors	75	71
Paving	2 Pavers, Roller	77	72

Notes:
1) Includes up to three pieces of typical equipment used for each type of activity.
2) Lmax = maximum sound level; Leq = equivalent sound level.

Source: Federal Highway Administration 2006; UC Davis 2020 LRDP EIR, Noise Chapter, https://ucdavis.app.box.com/s/1gfctnj0jo15gbjqf9ljza7f4yxvn70p, Accessed January 16, 2025

It is assumed that noise attenuates by 6bB per doubling of distance[1]. The estimated construction noise levels at various distances are presented in Table 6.13-4, *Maximum Noise Levels Generated by Construction Equipment at Various Distances*. The nearest receptors, which are 1000 feet or more away from the project site, could be exposed to temporary and intermittent noise levels ranging from 53 to 61 dBA L_{eq} when construction activities occur near the project site boundary. However, these construction noise would not have the potential to exceed the Imperial County significance threshold of 75 dBA.

Table 6.13-4
Maximum Noise Levels Generated by Construction Equipment at Various Distances

Construction Activity	Combined L_{eq} at 100 Feet	Combined L_{eq} at 200 Feet	Combined L_{eq} at 400 Feet	Combined L_{eq} at 800 Feet
Demolition	79	73	67	61
Site Preparation	74	68	62	56
Grading	78	72	66	60
Building and Utilities	76	70	64	58
Architectural Coating	71	65	59	53
Paving	72	66	60	54

Notes:
1) Includes up to three pieces of typical equipment used for each type of activity.
2) Lmax = maximum sound level; Leq = equivalent sound level.

Source: Federal Highway Administration 2006; 2020 LRDP EIR, Noise Chapter, https://ucdavis.app.box.com/s/1gfctnj0jo15gbjqf9ljza7f4yxvn70p, Accessed January 16, 2025

[1] Acoustical Control Engineers and Consultants. Distance Attenuation. February 23, 2025. https://www.acoustical.co.uk/distance-attenuation/how-sound-reduces-with-distance-from-a-point-source/ Accessed January 27, 2025.

Considering the project's construction activities will be typically limited to between 7 a.m. and 7 p.m. Monday thru Friday and between 9 a.m. and 5 p.m. on Saturday and construction noise would not have the potential to exceed the Imperial County significance threshold of 75 dBA Leq averaged over 8 hours at any nearby residences; the project has a less than significant impact for construction activities occurring during the daytime. However, limited construction activities outside of these specific daytime hours may be necessary for worker safety and compliance with Cal/OSHA standards for heat illness prevention. It is expected that 5 after hour work sessions will be needed; two for the building main concrete slabs, one for greenhouse, and two for concrete flatwork. The nearby residences are 1000 feet or more away and are separated by buildings, a highway, and/or regular agricultural operations. These features act as noise barriers, reducing construction noise impacts.

However, noise impacts are still possible during nighttime construction work. Therefore, in the event that construction nightwork is necessary by the contractor, the construction contractor would be required to ensure that any construction equipment is used in a manner that minimizes potential noise impacts to sensitive receptors during sleeping hours (Mitigation Measure NOI-1).

Construction Trip Noise Impacts

Construction activities would also cause increased noise along access routes to and from the project site due to movement of equipment and workers, as well as haul trips. Project related construction noise would generate a maximum of 15 worker trips per day and 3 vendor trips per day. As a result, mobile source noise would increase along access routes to and from the project site during construction. However, mobile traffic noise from construction trips would be temporary and would cease upon project completion. Therefore, short-term haul truck noise impacts from construction traffic would be less than significant.

OPERATIONS

Mobile Noise

The proposed project may result in additional vehicular traffic on adjacent roadways, specifically East Holton Road, thereby increasing vehicular noise in the vicinity. As discussed in Section 6.17, *Transportation*, the project would generate approximately 50 daily trips. East Holton Road is a major arterial road in Imperial County and the project site is within a County designated existing noise impact zone, an increase of up to 50 trips is minimal and project-related traffic noise impacts would be less than significant.

Stationary Noise

Overall, stationary noise sources during project operation would include mechanical equipment and outdoor gathering areas. All stationary mechanical equipment would be required to comply with the California Building Code and Uniform Building Code requirements pertaining to noise attenuation. The Proposed Project will create an outdoor space with an arrival plaza, an approximately 3,475 square foot covered plaza, and presentation gardens. The outdoor space has the potential to gather crowds and become a source of stationary noise. The majority of these crowds will be attending workshops or fieldtrips and will occur during regular business hours and typically have no more than 50 individuals in attendance. The proposed project is within an existing developed area and will support existing operations. Sensitive receptors are also over 1000 feet

away from where these events would take place, which provides sufficient distance for adequate noise attenuation during daytime hours. Furthermore, Desert REC currently hosts one annual large open house event, the farm to Preschool Festival, that hosts up to 1000 people that come and go over a 5 hour period on a Saturday; this project does not propose to change the frequency of these large open house events. Stationary noise impacts would be less than significant in this regard.

Mitigation Measures:

NOI-1: Nighttime Construction Work

For any construction activity that must extend beyond the daytime hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 9:00 a.m. and 5:00 p.m. on Saturdays, the construction contractor for that project will incorporate the following noise reduction measures into construction specifications for contractor(s) implementation during project construction:

1. Advance notice for nighttime work will be provided to project sponsor at least 72 hours for review and approval.
2. All construction equipment used for future projects will be equipped with suitable exhaust and intake silencers in good working order. All construction equipment will be properly maintained and equipped with intake silencers and exhaust mufflers and/or engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds, if used, will be closed during equipment operation.
3. All construction equipment and equipment staging areas will be located as far as possible from nearby noise-sensitive land uses, and/or located such that existing or constructed noise attenuating features (e.g., temporary noise wall or blankets) block line of sight between affected noise-sensitive land uses and construction staging areas, to the extent feasible.
4. Individual operations and techniques will be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete offsite instead of onsite) where feasible and consistent with building codes and other applicable laws and regulations.
5. Stationary noise sources such as generators or pumps will be located as far as feasible from noise-sensitive land uses.
6. Use "quiet" gasoline-powered compressors or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.
7. Prohibit idling of inactive construction equipment for prolonged periods (i.e., more than 2 minutes).

Provide advance notification in the form of mailings/deliveries of notices to surrounding residents regarding the construction schedule, including nighttime work throughout the duration of the construction period.

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

Less Than Significant Impact.

CONSTRUCTION

Any increase in ground borne vibration levels would primarily be associated with the construction of the engagement center. The types of construction vibration impacts include human annoyance and building damage. The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations in their 2018 Transit Noise and Vibration Impact Assessment Manual, as shown in Table 6.13-5, *Typical Vibration Levels for Construction Equipment*.

Continuous/frequent intermittent sources of vibration (such as construction activity) that exceeds the 0.25 PPV would have the potential to cause damage to buildings in the "historic and some old buildings" category.[2] However, the closest off-site structure is a commercial building 500 feet south of the project site and then rural residences 1000 feet or more away. Vibration is not expected to be perceivable at these distances. Therefore, short-term construction would not expose receptors to significant groundborne vibrations, and impacts would be less than significant in this regard.

Table 6.13-5
Typical Vibration Levels for Construction Equipment

Equipment	Reference Peak Particle Velocity at 25 Feet (in/sec)
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer/Tractors	0.003
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual, Table 7-4 Vibration Source Levels for Construction Equipment*, September 2018.	

OPERATIONS

Operation of the project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. As such, it can be reasonably inferred that the operations of the project would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur pertaining to vibration impacts from operation of the project.

Mitigation Measures: No mitigation measure is required.

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

No Impact. There are no airports within 2 miles of the project site. The Imperial County Airport is located approximately 7 miles to the northwest, the Holtville Airport is located approximately 10 miles to the east, and the Calexico International Airport is located approximately 10 miles to the south. Additionally, the project site is not located within the vicinity of a private airstrip or related facilities. Therefore, project implementation would not expose people residing or working in the project area to excessive airport noise levels or safety hazards. No impacts would occur in this regard.

Mitigation Measures: No mitigation measure is required.

[2] UC Davis. *2020 LRDP Update Final Supplemental EIR. 3.11 Noise.* https://ucdavis.app.box.com/s/1gfctnj0jo15gbjqf9ljza7f4yxvn70p. Accessed January 27, 2025.

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6.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (for example, through extension of roads or other infrastructure). No residential uses would be developed as part of the project. Therefore, the project would not induce direct population growth in Imperial County through new housing development.

The project proposes a new Engagement Center at the existing Desert REC. The proposed Engagement Center is intended to provide a space for existing programs provided by the Desert REC. It is anticipated that the project could increase employees and onsite researchers from 31 to 34, intern students from 12 to 16, and volunteers from 4 to 10 at any given time. The new facilities could increase community members visiting the site by 10 or 20 percent. It is assumed that Engagement Center will serve people already living in the surrounding area. However, employment opportunities resulting from the project could directly increase the population around the Desert REC site, as employees (and their families) may choose to relocate closer to Desert REC; the same applies to new students attending programs at the Engagement Center. Estimating the number of future employees and students who may choose to relocate closer to the Desert REC would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Further, the Desert REC is located in a rural agricultural area with limited housing in its immediate vicinity; it is approximately 4 miles west of Holtville and 7 miles east of El Centro. Given the project would only add three employees, four students, and six volunteers to the project site, this increase would result in a nominal indirect impact on population growth and housing demand, if any. Thus, the proposed project would not induce substantial unplanned population growth within Imperial County, either directly or indirectly. Impacts in the regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The project proposes to demolish one house and remodel another house to a non residential use. Both houses are currently vacant or used for storage and have not been used for residential purposes over 10 years. There is one active residence at the Desert REC facility; however, the proposed project would not impact this residence or the number of people that live on site.[1] Project implementation would not displace any existing housing or persons. Thus, the project would not necessitate the construction of replacement housing elsewhere and no impacts related to substantial housing displacement would occur.

Mitigation Measures: No mitigation is required.

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[1] Direct Communication with Desert REC staff, February 2025.

6.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

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

1) Fire protection?

Less Than Significant Impact. The nearest fire station to the project site is located at 549 Fern Street in the City of Holtville, which is operated by the Holtville Fire Department. This fire station is approximately 4 miles east of the project site. The Holtville Fire Department contracts with the Imperial County Fire Department (ICFD) to provide additional fire protection and emergency medical services to the area. The ICFD has nine (9) stations, with its Imperial and Herber Stations located closest to the project site, both approximately 8 miles away.[1] The City of Holtville reviews funding levels for the Fire Department to ensure that an adequate level of service and facilities are provided to residents.[2]

The Holtville Fire Department and, through contract, the ICFD will continue to provide fire protection services to the project site. The proposed project would include all necessary ingress and egress for traffic circulation and emergency response and would comply with all applicable

[1] Imperial County. *Fire Department and Office of Emergency Services*. https://firedept.imperialcounty.org/ Accessed December 15, 2024.
[2] City of Holtville. General Plan Update. https://www.holtville.ca.gov/wp-content/uploads/2023/05/General-Plan-Draft_Holtville_2017-6-13.pdf. Accessed February 4, 2025.

requirements for construction, access, water mains, fire flows, and life safety requirements, as enforced through the University of California (UC) Fire Marshall at UC Davis. In addition, the proposed project would be required to comply with applicable safety and fire protection regulations, including California building and fire codes, as enforced by the UC Fire Marshall. as such, the project would be required to comply with all permit requirements, which may include a Fuel Modification Program, if requested by the UC Fire Marshall. As discussed in Section 6.14, *Population and Housing*, project implementation could result in a nominal increase in staff and visitors. This nominal increase would not result in the need for new fire protection facilities, the construction of which would result in significant adverse effects, in order to maintain acceptable response times, service ratios, or other performance objectives. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

2) Police protection?

Less Than Significant Impact. The Imperial County Sherriff's Office (ICSO) provides law enforcement services to the County.[3] The nearest ICSO station is located within the City of Holtville, approximately 4 miles southeast of the project site. The project does not include any new land uses. Therefore, implementation of the project would not induce population growth that would necessitate the need for new or expanded law enforcement services, the construction of which could cause significant environmental impacts. No impacts would occur.

Development of the proposed project would result in a nominal increase in employees/students at the project site, compared to the existing condition. This nominal increase is not anticipated to result in the need for additional officers in the Portola team and would not require the construction of additional police service facilities. The proposed project would implement security features, such as external building and surface parking security lighting. The proposed project would include all necessary ingress and egress to ensure emergency access. Impacts to police services would be less than significant.

Mitigation Measures: No mitigation is required.

3) Schools?

Less Than Significant Impact. The project is within the Holtville Unified School District (HUSD) boundary. The project would construct a new Engagement Center to support existing programming at the Desert REC. The intent of the proposed project is to support the University's existing education program at the Desert REC. As discussed, project could result in a nominal increase in employees and students. However, this nominal increase would not result in new faculty housing or a substantial increase in student enrollment for kindergarten through 12th grade in part because most employees are expected to already live in the area. Therefore, the demand for schools would not substantially increase and the project's new Engagement Center would support existing faculty and students at the Desert REC. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

[3] Imperial County Sheriff. *About Us*. https://icso.imperialcounty.org/. Accessed December 15, 2024.

4) Parks?

Less Than Significant Impact. The project does not propose new or physically altered parks or recreational facilities; visitors to the site attend specific educational or work-related activities and do not use recreational facilities. The Parks & Recreation Division of the Imperial County Department of Public Works is dedicated to the improvement, repair, expansion, and implementation of Parks & Recreation throughout the Imperial County.[4] The project is not expected to substantially impact the County's existing parks or recreational facilities. Although the project could result in a nominal increase in employees and students at the Desert REC, this increase would not result in substantial population growth, nor generate substantial demands for parkland or other recreational facilities. Less than significant impacts related to park services and facilities would occur.

Mitigation Measures: No mitigation is required.

5) Other public facilities?

Less Than Significant Impact. Other public services that could potentially be impacted by the project include public libraries. Library services for the area are provided by the Imperial County Public Library (ICPL). OCPL operates three public library branches in nearby the cities of Calipatria Heber, and Holtville. The closest public library to the project site is the Holtville Branch, located at 101 East 6th Street, approximately 4.5 miles east of the project site. As discussed, the project's nominal increase in employees and students at the Desert REC would not result in a substantial demand for library services. Therefore, less than significant impacts related to other public facilities (such as library services) would occur.

Mitigation Measures: No mitigation is required.

[4] Imperial County Department of Public Works. *Parks and Recreation*. https://publicworks.imperialcounty.org/divisions/#parks. Accessed December 15, 2024.

6.16 RECREATION

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

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

Less Than Significant Impact. The project would not result in a substantial increase in demand for parks or other recreational facilities. The project could result in a nominal increase in employment and students within the nearby City of Holtville or in Imperial County. However, unplanned direct and indirect population growth impacts would be less than significant. As such, project is not anticipated to result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Furthermore, visitors to the Desert REC will be there to attend educational programing and not use any recreational facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The project does not include recreational facilities, nor would it require the construction or expansion of existing recreational facilities. No impacts to recreational facilities would occur.

Mitigation Measures: No mitigation is required.

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6.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d. Result in inadequate emergency access?			✓	

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

Less Than Significant Impact. The project site is located in the Desert REC, which serves as a representative site for agricultural and horticultural research. The proposed project would construct a new Engagement Center that would support existing programming at the Desert REC. As an entity of the University, the Desert REC is not subject to municipal regulations such as general plans or municipal codes. However, the proposed project would be subject to the *University of California – Policy on Sustainable Practices* (Policy), which establishes goals in 13 areas of sustainable practices including transportation. As discussed in Sections III.D and V.D, *Sustainable Transportation*, of the Policy, the University includes goals and procedures for transportation to implement sustainability efforts through sustainable business practices. The following goals related to transportation apply to the proposed project:

- Each location will reduce GHG emissions from its fleet and report annually on its progress. Locations will implement strategies to reduce emissions from University-owned or operated fleet vehicles to align climate action goals. Carbon neutral fleets can be achieved if vehicles produce no tailpipe emissions, use a clean transportation fuel, and/or if carbon offsets are purchased. To support this goal, each location will ensure that:
    - After July 1, 2023, zero-emission vehicles, plug-in hybrid, or dedicated clean transportation fueled vehicles will account for at least 50 percent of all vehicle acquisitions (including both leased and purchased vehicles).
    - All sedans and minivan acquisitions will be zero-emission or plug-in hybrid vehicles, except for public safety vehicles with special performance requirements.
    - In applications where zero-emission vehicles are not available, regardless of vehicle size class, the use of clean transportation fuels and other low-emission fuels will be prioritized.

- The University recognizes that single-occupant vehicle (SOV) commuting is a primary contributor to commute-related GHG emissions and localized transportation impacts.
    - By 2025, each location will strive to reduce its percentage of employees and students commuting by SOV by 10 percent relative to its 2015 SOV commute rates.
    - By 2050, each location will strive to have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV.
- Recognizing that flexible work arrangements, including telecommuting, are a low-cost, effective way to reduce emissions and carbon footprint, each location should review and update local employee telecommute and flexible work policies, guidelines, procedures, and other applicable documents to normalize and promote telecommuting options and other flexible scheduling, as aligned appropriately based on business needs.
- Consistent with the State of California goal of increasing alternative fuel (specifically electric) vehicle usage, the University will promote purchases and support investment in alternative fuel infrastructure at each location.
    - By 2025, each location will strive to have at least 4.5 percent of commuter vehicles be zero-emissions vehicles (ZEV).
    - By 2050, each location will strive to have at least 30 percent of commuter vehicles be ZEV.

The new Engagement Center would include a bus drop-off location, bicycle parking, and electric vehicle charging stations, which would promote alternative modes of transportation. As discussed in Section 6.8, *Greenhouse Gas Emissions*, in compliance with sustainable practices included the University's Design Guidance, UC Policy on Sustainable Practices, and California Green Building Standards Code—Part 11, Title 24, California Code of Regulations (CALGreen), the project would provide bicycle parking spaces and electric vehicle parking spaces in accordance with LEED certification requirements. Further, Desert REC provides flexibility with regard to its staffing that would effectively reduce VMT. Currently, one employee lives on-site, one employee commutes to work using an EV, and roughly 7 to 9 employees work remotely for one or two days each week. Additionally, Desert REC has two hybrid vehicles for staff to utilize for business purposes. As such, the project would be consistent with these goals. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy regarding transportation and impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The State of California Governor's Office of Planning and Research (OPR), in implementing Senate Bill (SB) 743, issued proposed updates to the CEQA guidelines in November 2017 that amend the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project would result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December of 2018, and as of July 1, 2020, the provisions of the new section are in effect Statewide. Concurrently, OPR developed the *Technical Advisory on Evaluating*

Transportation Impacts in CEQA (OPR's Technical Advisory), dated December 2018[1], which provides non-binding recommendations on the implementation of VMT methodology which has significantly informed how VMT analyses are conducted in the State. The University has followed the CEQA guidelines making VMT the primary metric for evaluating transportation impacts.

To evaluate the project's potential transportation impact, this analysis uses recommendations from the Technical Advisory. Prior to conducting a full VMT analysis, a screening evaluation is carried out to determine if the project may be assumed to cause a less than significant transportation impact. If the project does not meet one of the screening criteria, a VMT analysis is carried out where the project VMT rate is compared to the applicable threshold of significance VMT rate. Feasible mitigation measures are identified if the project is found to cause a significant transportation impact.

According to OPR's Technical Advisory, small projects that generate less than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. Table 6.17-2, *Project Trip Generation*, details the project's trip generation based on population data provided by Desert REC staff. As shown, the project is anticipated to generate a maximum of approximately 46 net average daily trips, including 23 trips in the a.m. peak hour and 13 trips in the p.m. peak hour during a weekday.

Table 6.17-1
Desert REC Daily Population (Existing and Proposed)

Project Use[1]	**Existing Population**	**Total Population** (Existing + Proposed Project)	**Net Increase**	**Time In**	**Time Out**
Employee / On-site Researchers	31	34	3	6:00 – 9:00am	3:00 – 5:00pm
Intern Students	12	16	4	6:00 – 9:00am	3:00 – 5:00pm
Volunteers	4	10	6	6:00 – 9:00am	3:00 – 5:00pm
Fieldtrips/ Classes/Visitors[2]	50	60	10	9:00am	1:00pm
TOTAL	**97**	**120**	**23**	**-**	**-**
Notes: 1. Developed based on site specific information provided by site operator for new activities only. However, not all of these individuals will be on site simultaneously. 2. These individuals typically arrive at the Desert REC site via bus.					
Source: UC ANR/UCD Correspondence, Project Population Information, October 2023.					

[1] State of California Governor's Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA. April 2018. https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf. Access February 21, 2025.

Table 6.17-2
Daily Project Trip Generation (Additional Trips Over Existing Conditions)

Project Use[1]	Average Daily Trips			AM Peak Hour[2]			PM Peak Hour[3]		
	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
Employee/ On-site Researchers	3	3	6	3	0	3	0	3	3
Intern Students	4	4	8	4	0	4	0	4	4
Volunteers	6	6	12	6	0	6		6	6
Fieldtrips/ Classes/ Visitors	10	10	20	10	0	10	0	0	0
NET TOTAL PROJECT TRIPS	**23**	**23**	**46[4]**	**23**	**0**	**23**	**0**	**13**	**13**

Notes:
1. Trip generation developed based on site specific information provided by site operator for new activities only.
2. AM peak hour assumes highest hour during the peak period of adjacent streets between 7:00 a.m. and 9:00 p.m.
3. PM peak hour assumes highest hour during the peak period of adjacent streets between 4:00 a.m. and 6:00 p.m.
4. This is a maximum number, assuming all individuals come to the site daily during peak hours. This is an unlikely scenario.

Source: UC ANR/UCD Correspondence, Project Population Information, October 2023, January 2025.

As shown in Table 6.17-2, the proposed project is anticipated to generate a maximum of 46 weekday daily trips. This number is quite conservative. Not all of these individuals will be on site daily, nor will they enter or exit the site at the same time. It is likely that many will arrive outside of peak hours. Furthermore, fieldtrips, classes, and visitors typically travel by bus to the Desert REC site. Given this and that the project's net daily trips of 46 is below the 110-trip threshold identified by OPR's Technical Advisory, the project meets the screening criteria and would result in a less than significant VMT impact.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The project does not propose changes to the County's or existing Center's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment or trucking facilities). Under existing conditions, primary pedestrian and vehicular access to the Desert REC is provided by three access points along E. Holton Road. The project proposes improving the central access point with improving the driveway entrance, widening the road, providing a bus turnout, adding 15 parking spaces, and improving circulation within the Desert RRC site. The proposed improvements would not result in hazardous traffic conditions.

During construction, the central driveway will need to be temporarily closed to construct the proposed improvments. Closure of the central driveway will not impact circulation of vehicles in or around the Desert REC, as the two other driveways will remain open. Improving the entrance of the central driveway could impact E. Holton Road; however impacts would be short term and UC ANR would keep at least one lane of travel open at all times with appropriate traffic controls to allow travel in both directions. Furthermore, UC ANR will attain an encroachment permit from Imperial County, if necessary. Impacts related to any potential impacts related to hazards are less than significant. Thus, impacts related to hazards due to geometric design features or incompatible uses would be less than significant.

Mitigation Measures: No mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. Construction of the proposed Project may require temporary partial road closures in public rights-of-way on E. Holton Road. The Project would be designed and constructed to state standards and would ensure emergency access would be maintained during construction. Furthermore, as mentioned above, a traffic control plan would be implemented to provide access to all road users during construction, and to prevent interference with emergency response vehicles. Therefore, construction and operation of the proposed Project would not result in inadequate emergency access and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

6.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) 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 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.		✓		

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Section 21074 of the Public Resources Code also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource, in its discretion and supported by substantial evidence..

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of

Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this environmental document.

In compliance with AB 52, the University of California, Agriculture and Natural Resources (UC ANR) distributed letters notifying each tribe (identified pursuant to a recommended list of tribes provided by the Native American Heritage Commission [NAHC]) for the purposes of AB 52 of the opportunity to consult with UC ANR regarding the proposed project. The letters were distributed by certified mail on November 21, 2023.

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

1) 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)?

No Impact. As detailed in Response 6.5(a), no historic resources listed or eligible for listing in a State or local register of historic resources are located on the project site. Therefore, no impacts related to known historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

Mitigation Measures: No mitigation is required.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. As noted above, UC ANR distributed letters to potentially affected Native American tribes which have cultural or traditional affiliation with the project area (identified pursuant to a recommended list of tribes provided by the NAHC) in accordance with AB 52. The letters were distributed by certified mail on November 21, 2023. The 30-day response period for AB 52 consultation concluded 30 days after receipt from each tribe. UC ANR did not receive any communications or requests for consultation. As such, consultation efforts pursuant to AB 52 concluded. As discussed in Section 6.5, *Cultural Resources*, although unlikely, project-related construction could uncover previously undiscovered archaeological resources during excavation into native soil. In the unlikely event that tribal cultural resources are encountered during ground-disturbing activities, Mitigation Measure CUL-1 would require all project construction efforts to halt until a qualified archaeologist is retained by UC ANR, or their designee, and examines and evaluates the find. If the archaeological find is determined to be significant under CEQA, the archaeologist would prepare and implement a data recovery plan, which would include performing technical analyses, report filing with the South Coastal Information Center, and providing the recovered material to an appropriate repository for curation, in consultation with a culturally-affiliated Native American if applicable. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of a tribal cultural resource pursuant to subdivision (c) of Public Resources Code Section 5024.1, and impacts would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure CUL-1.

6.19 UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. Implementation of the project would require utilities services, including water, wastewater treatment, storm water infrastructure, electrical, and telecommunications facilities. As such, the following analysis is provided.

WATER

The Desert REC purchases water from the Imperial Irrigation District (IID). IID has an irrigation canal to the west of the project site and distributes raw water from this canal to Desert REC. Desert REC uses this water for both agricultural and potable uses. Water that will be used for potable uses is treated onsite to be in compliance with all potable water regulations, under a permit issued by the State Water Resources Control Board, Division of Drinking Water. From the onsite potable water plant there is potable water main and fire flow lines that move water throughout the REC site. New buried underground 2 ½ inch potable water and 4-inch fire flow lines will be extended for new on-site taps into existing Center systems and run approximately 100 feet south to new points

of connection at the two new buildings and greenhouse. It is anticipated that minimal additional water will be needed to support the proposed project. The current water treatment and distribution system can fully service the proposed project; however, minimal additional water may need to be purchased from IID to support the project. It is anticipated that an increase of up to 20% of water to be treated for potable use may be necessary. Only 0.5% of total water purchased from IID is for potable uses; the majority is used for agricultural purposes. Therefore, this increase for domestic water use is relatively small in comparison to the amount of water used for agriculture and other purposes at the site and can be accommodated within the overall amount of water that Desert REC purchases from IID for all uses.

Furthermore, the project would utilize ultra-low flow fixtures, automatic sensor controls, and reduced flow aerators at all new fixtures, to exceed current California Green Building Standards Code—Part 11, Title 24, California Code of Regulations (CALGreen) Water Efficiency measures by 20 percent and as required for Leadership in Energy and Environmental Design (LEED) Certification. High-efficiency domestic hot water (DHW) systems would be installed in all buildings.

Therefore, other than those on-site facilities proposed as part of the project, no other construction of new or expanded water supply facilities that could result in substantial environmental impacts would result. Impacts related to water facilities would be less than significant.

WASTEWATER

Sewer service is provided onsite through an existing on-site septic system that has capacity for the new buildings. A new buried underground 6-inch line will extend from the two new buildings to connect into an existing tap in existing Center sewer main approximately 160' north of new building. Effluent will be conveyed into and treated by an existing on-site septic system. No other modifications are needed to the onsite septic system. This septic system is permitted by Imperial County and the State Water Resources Control Board; Desert REC operates the septic system in compliance with all standards and requirements. No other construction of new or expanded wastewater facilities that could result in substantial environmental impacts would result. A less than significant impact would occur in this regard.

STORMWATER

As discussed in to Section 6.10, *Hydrology and Water Quality*, the overall drainage patterns within the project site would remain similar to existing conditions. The project proposes to develop onsite stormwater infrastructure within the Engagement Center. The exact location and design of the stormwater infrastructure will be determined following further hydrologic investigation during the project design phase. New landscaping would also incorporate drainage control and stormwater management (such as biofiltration within planters, bioswales, permeable pavers, and other low-impact design [LID] features). Therefore, other than those on-site facilities proposed as part of the project, no other construction of new or expanded stormwater facilities that could result in substantial environmental impacts would result. Impacts related to stormwater facilities would be less than significant.

DRY UTILITIES

Electricity would be provided by IID; there is an existing transmission line located in Holton Road along the frontage right of way, power will be routed underground at that point and will run parallel to the existing buried service approximately 120 feet north on-site to terminate in service entry at the new buildings. No increase in natural gas use would occur on site due to this project. To ensure that the Engagement Center is energy efficient and easy to maintain, the development would

be designed and constructed to a minimum Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Gold rating. The project would exceed the California Building Code (CBC) energy requirements by at least 20 percent and meet or exceed whole-building energy performance targets per Table 1 of the *University of California – Policy on Sustainable Practices*. High-efficiency lighting systems would be installed into all buildings, and adaptive light layering would be utilized for task, accent, and ambient lighting to allow lighting levels to be safely reduced under multiple circumstances. In accordance with CALGreen standards, the project would include solar facilities either in the form of panels mounted on the roof of the Engagement Center, as a parking shade structure, or panels that also provide shaded growing space for sensitive/high value crops. As such, the project would not require new or expanded dry utilities, other than those proposed on-site to support the project. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The proposed proejct does not present a substantial increase in water demand. As discussed in Response 5.19(a), Desert REC purchases raw water directly from IID, which is treated and used onsite. Minimal additional water may need to be purchased as a result of the Proposed Project. Furthermore, IID has senior water rights to the Colorado River, which is its sole source of water and is currently preparing a draft Drought Contingency Plan that would establish a framework for California contributions in the time of drought..[1] ‘

The project would implement the *University of California Policy on Sustainable Practices*, including compliance with the Green Building Design section. The project would also be required to comply with water efficiency and water conservation standards in the current *California Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6) and current California Green Building Standards Code.[2,3] The project would utilize ultra-low flow fixtures, automatic sensor controls, and reduced flow aerators at all new fixtures, as required for LEED Certification. Furthermore, the proposed project would include water-efficient features, such as low flow plumbing fixtures, irrigation to reduce water consumption, and low-water use vegetation for landscaping. The irrigation system would meet or exceed the State’s Model Efficient Landscape Ordinance and UC ANR’s requirements for water-efficient landscapes, as well as LEED standards. UC ANR continues to work to reduce water demand on campus consistent with UC ANR’s sustainability goals. Therefore, the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Project impacts would be less than significant in this regard

Mitigation Measures: No mitigation is required.

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1 Imperial Irrigation District, *Drought Contingency Plan*, https://www.iid.com/water/water-conservation/drought-contingency-plan, accessed January 13, 2025.

2 California Energy Commission, *2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings: For the 2022 Building Energy Efficiency Standards Title 24, Part 6, and Associated Administrative Regulations in Part 1*, updated December 23, 2022.

3 California Building Standards Commission, *2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen)*, effective January 1, 2023.

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

Less Than Significant Impact. Wastewater is treated onsite. There is no wastewater treatment provider associated with the Proposed Project. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The nearest active solid waste facility to the Project site is the Imperial Landfill, located approximately 4 miles northwest. The Imperial Landfill has a permitted capacity of 1,700 tons per day, a remaining capacity of 12,027,900 tons (as of March 2021) and a maximum permitted capacity of 19,514,700 tons through 2051.[4] This facility is in compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill 939), which requires each jurisdiction to maintain 15 years of solid waste disposal capacity. The Proposed Project is also not expected to generate a significant amount of solid waste, so with this and the availability of disposal capacity for the area, the project would not 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. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The University of California is not subject to Assembly Bill 939 or other local agency regulations pertaining to solid waste management. Nonetheless, the University of California has adopted the *University of California Policy on Sustainable Practices* that requires campuses to undertake aggressive programs to reduce solid waste generation and disposal. The proposed project would meet the requirements of the *University of California Policy on Sustainable Practices*, including compliance with the Zero Waste section. Therefore, the proposed project and would not violate solid waste regulations and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

[4] CalRecycle, *SWIS Facility/Site Activity Details; Imperial Landfille (13-AA-0019)*, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4191?siteID=603, accessed January 13, 2025.

6.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			✓	
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			✓	
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			✓	
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?				✓

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

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

Less Than Significant Impact. According to CAL FIRE, the project site is within a local responsibility area (LRA), not in a state responsibility area.[1] As discussed in Section 6.15, *Public Services*, the project would include all necessary ingress and egress for traffic circulation and emergency response and would comply with all applicable requirements for construction, access, water mains, fire flows, and life safety requirements. The project would not reduce traffic lanes or create physical barriers along adjacent roads, such as Meloland Road or Holton Road. The project would not include any physical barriers to roadways that would impair emergency access or local emergency evacuation plans. In addition, the proposed project would be required to comply with the University of California (UC) Fire Marshall's (or their designee's) regulatory requirements for the proposed project, which may include a Fuel Modification Program as well as appropriate fire permit(s). Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

[1] California Natural Resources Agency, Open Data Portal (https://data.ca.gov/dataset/state-responsibility-areas); accessed on 1/27/2025

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The Desert REC is surrounded by active agricultural fields and other built infrastructure such as roadways and canals. Removal of agricultural weeds and brush is part of UC ANR's normal regular maintenance. The project does not propose any new housing and would not result in permanent occupants. As such, due to the nature of the project and the existing adjacent development, the proposed project would not result in exposure to wildfire risks, including pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. The UC Fire Marshal, or their designee, may require a Fuel Modification Plan, as part of the Permit process during the design phase. Landscaped areas adjacent to new structures would be required to be dedicated for permanent vegetation management activities. The Fuel Modification Program would bring fire-safe landscaping and construction features together to improve community safety and reduce property loss during wildfire emergencies. Fuel Modification areas would be maintained for a successful long-term outcome. Furthermore, the permit would cover the timing of plans for construction, plan criteria needed for approval, plant lists for the zones, new construction inspection requirements, and introductory maintenance information.

In conclusion, the project is surrounded by agricultural development, does not propose habitable structures, and would not result in additional occupants on site. In addition, the project site does not have excessive slopes or other factors that would exacerbate fire risk. As such, the project would not exacerbate wildfire risks, and thereby expose project occupants to impacts related to wildfire. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The project would install water, wastewater, storm drain, and dry utilities, connecting the proposed Engagement Center to the existing utilities infrastructure at the Desert REC. The project will improve the existing central driveway off of Holton Road by widening and paving the driveway, adding vehicle parking spots and a new bus turnaround area. These improvements will increase accessibility by emergency vehicles. New electrical service will come from an existing transmission line located in Holton Road and will be routed underground to power the new buildings. Proposed infrastructure would be required to comply with the California Fire Code and would not exacerbate existing fire risk in the project area. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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?

No Impact. The project site is located in a flat area with no high or steep natural slopes. The project would not involve changes to slopes in the area and would improve drainage on-site. No impacts associated with downslope flooding or landslides are anticipated.

Mitigation Measures: No mitigation is required.

6.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Section 6.4, *Biological Resources*, no special-status plant or wildlife species were observed within the project site. However, due to the potential for nesting birds protected under the Migratory Bird Treaty Act (MBTA) and burrowing owls, a now listed special status species to be present on site, implementation of Mitigation Measures BIO-1 and BIO-2, would be required. Mitigation Measure BIO-1 requires a pre-construction burrowing owl take avoidance survey be conducted to determine presence/absence of burrowing owls on the project site. If any burrowing owls are detected during the survey(s), avoidance and minimization measures, as outlined in BIO-1, shall be implemented. Mitigation Measure BIO-2 requires a pre-construction nesting bird survey be conducted to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. If the nesting bird survey indicates the presence of nesting migratory native birds, Mitigation Measure BIO-1 requires buffers to ensure that any nesting migratory native birds are protected pursuant to the MBTA. With implementation of Mitigation Measure BIO-1 and BIO-2, the

project's potential impacts to special status species would be reduced to a less than significant level. As such, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

As described within Sections 6.5, *Cultural Resources*, and Section 6.18, *Tribal Cultural Resources*, there are no known historical, archaeological, or tribal cultural resources within the project site. However, unanticipated archaeological deposits may be uncovered during construction. As such, implementation of Mitigation Measure CUL-1 would require all project construction efforts to halt until a qualified archaeologist is retained by UC ANR, or its designee, and examines and evaluates the find. If the archaeological find is determined to be significant under CEQA, the archaeologist would prepare and implement a data recovery plan, which would include performing technical analyses, report filing with the SCIC, and providing the recovered material to an appropriate repository for curation, in consultation with a culturally-affiliated Native American if applicable.

As discussed within Section 6.7, *Geology and Soils*, the project site is located in the Salton Trough region of the Colorado Desert geomorphic province of southeastern California, which is an area of known paleontological sensitivity. There are no known paleontological resources within the project site. However, unanticipated paleontological deposits may be uncovered during construction. As such, implementation of Mitigation Measure GEO-1 would require all project construction efforts to halt until a qualified paleontologist is retained by UC ANR. The consulting paleontologist shall prepare a paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.

With adherence to Mitigation Measure CUL- 1 and GEO-1, the project would not eliminate important examples of the major periods of California history or prehistory

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 6.1 through 6.20, the proposed project would not result in any significant and unavoidable impacts in any environmental categories; it is anticipated that project impacts would be less than significant with implementation of existing regulatory requirements and/or project-specific mitigation measures. As such, the project would not significantly contribute to cumulatively considerable effects, and impacts would be less than significant with adherence to applicable mitigation measures.

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

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this Initial Study reviewed the project's potential impacts related to aesthetics, air quality, geology and soils, greenhouse gas emissions, hydrology/water quality, noise, and other issues. As concluded in

previous sections, the project would result in less than significant environmental impacts with implementation of the recommended mitigation measures. Therefore, the project would not result in environmental impacts that would cause substantial impacts on human beings.

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