Draft Program Environmental Impact Report

for the

City of Calexico 6th Cycle Housing Element Update

SCH # 2026030920

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List of Acronyms and Abbreviations

AAC	All-American Canal
AB	Assembly Bill
ADU	Accessory Dwelling Unit
AFFH	affirmatively furthering fair housing
AIA	Airport Influence Area
ALUC	Imperial County Airport Land Use Commission
ALUCP	Imperial County Airport Land Use Compatibility Plan
APN	Assessors Parcel Number
ATP	Active Transportation Plan
AWSP	IID Adaptive Water Supply Policy
BJRR	Baja California Railroad
BMP	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CA-MUTCD	California Manual on Uniform Traffic Control Devices
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Cal/OSHA	California Division of Occupational Safety and Health
CAPCOA	California Air Pollution Control Officers Association
Caltrans	California Department of Transportation District 11
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife, Inland Deserts Region 6
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFD	City of Calexico Fire Department
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CIP	City of Calexico Capital Improvement Program
City	City of Calexico
CMC	Calexico Municipal Code
CNEL	community noise equivalent levels

Connect SoCal or RTP/SCS	Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy
County	Imperial County or County of Imperial
CPD	City of Calexico Police Department
CTC	California Transportation Commission
COG	Council of Governments
CPUC	California Public Utilities Commission
CUSD	Calexico Unified School District
CWA	Clean Water Act
DEIR	Draft Environmental Impact Report
DWR	California Department of Water Resources
DEIR	Draft Environmental Impact Report
DIFs	developer impact fees
DOC	California Department of Conservation
DOT	U.S. Department of Transportation
DPM	Diesel particulate matter
DPR	California Department of Pesticide Regulation
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EMS	emergency medical services
EOP	Emergency Operations Plan
ES	Executive Summary
ESLs	Environmental Screening Levels
FAA	Federal Aviation Administration
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
Federal	United States of America
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GWP	global warming potential
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	Greenhouse Gas
HCD	California Department of Housing and Community Development
Housing Element	City of Calexico 6th Cycle Housing Element
housing site	City of Calexico 6th Cycle Housing Element site
HIN	High Injury Network
HCM	Housing Capacity Manual
HVAC	heating, ventilation, and air conditioning
ICAPCD	Imperial County Air Pollution Control District
ICTC	Imperial County Transportation Commission
IFC	International Fire Code
IID	Imperial Irrigation District
IRWM	Integrated Regional Water Management
IVC	Imperial Valley College

IV HEAT	Imperial Valley Hazardous Emergency Assistance Team
IVT	Imperial Valley Transit System
JADU	Junior Accessory Dwelling Unit
LAFCO	Imperial County Local Agency Formation Commission
LBP	Lead-Based Paint
LESA	California Agricultural Land Evaluation and Site Assessment
LOS	Level of Service
LTA	Local Transportation Analysis
LUST	leaking underground storage tank
LRTP	Regional Long-Range Transportation Plan
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
MFHSZ	Moderate Fire Hazard Severity Zone
MFI	Median Family Income
MGY	Million gallons per year
MHMP	Imperial County Multi-Jurisdictional Hazard Mitigation Plan
MMT CO2E	million metric tons of CO2 equivalent
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4s	municipal separate storm sewer systems
NAHC	Native Heritage Commission
NOP	Notice of Preparation
OAEP	Operational Area Emergency Plan
OES	California Governor's Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Governor's Office of Planning and Research
PCBs	polychlorinated biphenyls
Proposed project or project	6th Cycle Housing Element Update, Associated General Plan Amendments, and Zoning Ordinance Amendments determined by the City
PPV	peak particle velocity
PRC	Public Resources Code
PRPA	Paleontological Resources Preservation Act
QSA	Quantification Settlement Agreement
RHNA	Regional Housing Needs Allocation
RTP	Regional Transportation Plan
RWQCB	Colorado River Basin Regional Water Quality Control Board Region 7
SAP	City of Calexico Service Area Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCH	State Clearinghouse

SCCIC	South Central Coastal Information Center
SCIC	South Coast Information Center
SCS	Sustainable Communities Strategies
SDSU	San Diego State University
SIP	State Implementation Plan
SOI	Sphere of Influence
SMARA	Surface Mining and Reclamation Act
SR	State Route
SRA	State Responsibility Area
SSAB	Salton Sea Air Basin
State or state	State of California
STIP	State Transportation Improvement Program
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
TDM	Transportation Demand Management
TMDL	Total maximum daily load
TOCs	toxic air contaminants
TRB	Transportation Research Board
TSCA	Toxic Substances Control Act
USDOT	United States Department of Transportation
U.S. EPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UWMP	Calexico Urban Water Management Plan
VMT	Vehicle Miles Traveled
WSA	Water Supply Assessment
WUI	Wildland-Urban Interface
WWTP	Wastewater Treatment Plant

ES Executive Summary

ES.1 Project Overview

This document is a Draft Program Environmental Impact Report (DEIR) analyzing the environmental effects of the City of Calexico Housing Element and associated actions (proposed project or project). This section provides a brief synopsis of: (1) the proposed project, (2) the results of the environmental analysis contained within this DEIR, (3) the major areas of controversy and issues to be resolved by decision-makers, and (4) the alternatives to the project that were considered. This summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

ES.1.1 Project Location and Setting

Located in southern California, the City of Calexico (City) is an incorporated City within the County of Imperial and is roughly 200 miles southeast of Los Angeles, 120 miles east of San Diego, and 60 miles west of Yuma. The City in its entirety is approximately 5,516.8 acres or 8.62 square miles, and functions as an important binational gateway between Southern California and Baja California, Mexico. The City is bounded by unincorporated Imperial County to the north, with the community of Heber located approximately two miles away. To the west, the All-American Canal separates Calexico from surrounding agricultural lands and the Mt. Signal Solar Farm. The City's eastern boundary adjoins unincorporated Imperial County, while its southern boundary is defined by the U.S.–Mexico international border. The project location is comprised of 53 Housing Element sites included in the Housing Element Sites Inventory, collectively referred to as the “housing sites”. There is one additional rezone site assessed within this project, the Bowker site that shall be rezoned for Industrial, as discussed in greater detail in Chapter 3, Project Description. The housing sites are distributed throughout the City and are primarily located in areas with existing or planned infrastructure and public services, including proximity to major transportation corridors, as well as established residential neighborhoods. Regional access to the City is provided via State Route (SR) 111, SR 98, and Cole Blvd.

ES.1.2 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15124, the following primary objectives support the purpose of the project; assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this DEIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. Specifically, the project objectives are as follows:

- Facilitate the City's ability to accommodate the City's RHNA allocation for the 2021–2029 planning period.
- Support a range of housing types and densities that can accommodate households across all income levels, including very low-, low-, moderate-, and above-moderate-income categories, consistent with State housing law requirements.
- Ensure internal consistency between the Housing Element, General Plan, and Zoning Code by identifying and evaluating necessary amendments that enable the anticipated housing capacity and development patterns.
- Promote land use patterns and housing programs that support affirmatively furthering fair housing (AFFH), including increased access to housing opportunities and resources for all segments of the community, including persons with special needs.
- Facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services, such that development can occur without causing or exacerbating environmental effects where feasible.

ES.1.3 Project Description

The project consists of the following components: 1) the City of Calexico 6th Cycle 2021–2029 Housing Element (Housing Element); 2) associated General Plan Amendments, including the corresponding consistency updates to the City of Calexico Land Use Element; 3) Zoning Ordinance Amendments to implement by-right housing per the Housing Element; and 4) rezoning the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I) as further discussed in Chapter 3, Project Description. These project components make up the term "proposed project," or "project" used throughout this DEIR. The proposed project does not approve specific development projects. Rather, it establishes regulatory and policy changes that would allow future residential development consistent with amended land use designations and zoning standards. The project description is intended to provide the level of detail necessary to evaluate potential environmental effects of Housing Element implementation at a programmatic level.

ES.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table ES-1: Summary of Environmental Impacts, located at the end of this section, summarizes the significant and less than significant effects identified during the environmental analysis completed for the project. Table ES-1: Summary of Environmental Impacts also includes a mitigation framework to reduce the significant environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. The mitigation measures listed in Table ES-1: Summary of Environmental

Impacts are also discussed within each relevant section in Chapter 4, Environmental Analysis.

ES.3 Issues to be Addressed

The Notice of Preparation (NOP) was distributed on March 20, 2026, for a 30-day public comment period. In addition, a public scoping meeting was held on Thursday, April 9, 2026 from 6:00 to 7:00 p.m. at the City of Calexico Camarena Memorial Library, 850 Encinas Ave, Calexico, CA 92231, within the Robert F. Morales Multipurpose Room. The NOP, comment letters, and transcription of the scoping meeting comments are included in this DEIR as Appendix A. Potentially significant impacts on the following environmental issues are analyzed in detail in the DEIR:

4.1 Agriculture Resources

4.2 Air Quality

4.3 Biological Resources

4.4 Cultural and Tribal Cultural Resources

4.5 Geology/Soils

4.6 Greenhouse Gas Emissions

4.7 Hazards and Hazardous Materials

4.8 Hydrology and Water Quality

4.9 Land Use and Planning

4.10 Noise

4.11 Population and Housing

4.12 Public Services and Recreation

4.13 Transportation/Traffic

4.14 Utilities and Service Systems

4.15 Wildfire

ES.4 Issues to be Resolved by the Decision-Making Body

Issues to be resolved include how to reduce programmatic significant, unavoidable adverse environmental impacts associated with the project to the maximum extent feasible while achieving project objectives, through adoption of mitigation measures and/or alternatives to the project identified in this DEIR.

ES.5 Project Alternatives

To fully evaluate the environmental effects of projects, CEQA mandates that alternatives to the project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location, which are capable of avoiding or substantially

lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

The DEIR addresses two (2) project alternatives: the No Project Alternative and the Reduced Sites Alternative. Alternatives to the proposed project are evaluated in full in Chapter 5, Alternatives.

ES.5.1 No Project Alternative

The No Project Alternative assumes the continued implementation of the City's existing General Plan, zoning regulations, and Housing Element, without adoption of the proposed Housing Element, General Plan amendments, zoning amendments, or the proposed rezone of the Bowker Industrial site (APN 059-180-029) from Residential Condominium (RC) to Industrial (I). Under the No Project Alternative, no changes would occur to the City's existing land use designations or zoning districts for the housing sites identified in the proposed project. Residential densities would remain as currently permitted, and the Land Use Element would not be amended to increase allowable residential densities or modify land use designations. Existing land uses would continue, and future development would occur in accordance with the City's current General Plan, zoning regulations, and development standards. Under this alternative, the City would not provide sufficient residential capacity to accommodate its Regional Housing Needs Allocation (RHNA), particularly for low-income households, and the No Project Alternative would not achieve one of the primary objectives of the proposed Housing Element.

ES.5.2 Reduced Project Alternative

The Reduced Sites Alternative would implement the Housing Element, associated zoning amendments, and General Plan amendments while reducing the number of housing sites included in the housing inventory. This alternative would concentrate housing development within fewer sites located in more densely developed areas of the City and away from the urbanized edge, with the intent of reducing potential impacts to agricultural resources and vehicle miles traveled (VMT). To achieve this, undeveloped housing sites 1, 2, 15, 16, and 17 would be removed from the inventory, while nearby housing sites 3 and 18 would remain to ensure sufficient capacity to meet Regional Housing Needs Assessment (RHNA) requirements and obtain California Department of Housing and Community Development (HCD) approval.

The Reduced Sites Alternative would include the minimum number of housing sites and units necessary to meet the City's RHNA allocation, including its lower-income housing need. Although the alternative would remove several sites previously identified in the 5th Cycle Housing Element, the remaining inventory would continue to provide adequate

housing capacity. The alternative would accommodate approximately 4,982 housing units and an estimated population of 19,031 residents, representing a reduction of approximately 3,102 residents compared to the proposed project. Other than the reduced housing sites inventory, the alternative would retain all other project components, including General Plan Land Use Element consistency updates and the rezoning of the Bowker site from Residential Condominium (RC) to Industrial (I). Accordingly, the Reduced Sites Alternative would meet all project objectives while reducing the overall geographic extent of potential housing development.

ES.6 Environmentally Superior Alternative

Among the project alternatives, the Reduced Sites Alternative is the environmentally superior alternative. It would eliminate five (5) undeveloped sites at the City's northern urban edge, reduce potential buildout by 813 units, and reduce the projected population by approximately 3,102 residents. In comparison to the No Project Alternative, and the proposed project, the Reduced Sites Alternative would reduce environmental effects related to: farmland conversion, construction and operational emissions, sensitive habitat loss, greenhouse gas emissions, VMT, ground disturbance, stormwater runoff, noise, demand for public services and recreation, and demand for water, wastewater, energy, and solid waste services. The alternative would not eliminate all significant impacts: agricultural resources, air quality, greenhouse gas emissions, and transportation impacts would remain significant and unavoidable because substantial development would still occur on remaining sites, including sites at the urban edge and sites that exceed the City's VMT threshold. Nevertheless, those impacts would be less severe than under the proposed project.

The Reduced Sites Alternative would also feasibly attain all of the basic project objectives. Its estimated capacity of 4,982 units would exceed the City's RHNA of 4,868 units, including the applicable lower-income need, while retaining the Housing Element Update, General Plan and zoning consistency amendments, AFFH framework, and Bowker Industrial site rezone. Accordingly, the Reduced Sites Alternative represents the best balance between reducing the proposed project's environmental impacts and achieving the City's housing and planning objectives.

Table ES-1: Summary of Environmental Impacts

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
4.1 Agricultural Resources			
Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Implementation of the proposed Housing Element could facilitate the long-term conversion of approximately 166 acres of Important Farmland identified by the California Department of Conservation Farmland Mapping and Monitoring Program, including approximately 100 acres of Prime Farmland and 66 acres of Farmland of Statewide Importance. While the broader conversion of agricultural lands within the City and Sphere of Influence was previously evaluated in the 2007 Calexico General Plan EIR, these impacts are limited to housing opportunity sites where new General Plan land use designation changes are proposed. While adoption of the proposed project would not directly convert Farmland to nonagricultural uses, the project identifies approximately 166 acres of housing sites that are currently designated as Farmland. Future residential development of these sites could result in the conversion of important farmland to non-agricultural uses. Therefore, implementation of the project could facilitate the long-term conversion of Farmland, thus impacts would be potentially significant.	**MM AG-1:** The applicant shall contribute fair share fees towards, and/or shall comply with, any applicable agricultural impact mitigation program initiated by the City of Calexico or County of Imperial prior to grading of the project site. The City shall verify compliance with this measure prior to issuance of grading permits or other discretionary approvals, as applicable.	With implementation of **MM AG-1**, impacts associated with the conversion of Farmland would be reduced, but this mitigation is not guaranteed to occur. Additionally, the precise extent and nature of impacts that could result from the implementation of the project would be determined when specific project details are developed. Therefore, impacts relating to conversion of Farmland to non-agricultural uses would remain **significant and unavoidable.**
Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Williamson Act contracts are no longer in effect within Imperial County, including the City of Calexico, following the County's decision to discontinue participation in the program and the expiration of all remaining contracts by December 31, 2018. In addition, none of the Housing Element sites are designated or zoned for agricultural use, and the project does not propose amendments to agricultural zoning districts. Therefore, implementation of the Housing Element would not conflict with agricultural zoning or Williamson Act contracts, and impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])? or	The City of Calexico contains no forest land, timberland, or Timberland Production Zone lands, and the Housing Element sites are located within the existing urbanized area on residential, commercial, industrial, vacant infill, and redevelopment parcels. As a result, implementation of the Housing Element would not conflict with forestry zoning, result in the conversion or loss of forest resources, or affect timberland. In addition, the project focuses future residential growth within the existing city limits and does not require infrastructure extensions into undeveloped or agricultural areas that could indirectly facilitate the conversion of farmland or forest land. Therefore, the project would have no impact on forest or timber resources.	No impact would occur. No mitigation is required.	**No impact** would occur.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project result in the loss of forest land or conversion of forest land to non-forest use?			
Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Housing Element implementation could allow residential development next to active farms, exposing future residents to dust, noise, odors, pesticide use, nighttime operations, and agricultural truck traffic. These sensitive receptors could also increase complaints about routine farming, creating land use conflicts. Although General Plan Land Use Policy 2a requires buffers and setbacks between incompatible uses, future project locations, designs, and intensities are unknown; therefore, their effectiveness cannot be fully evaluated at the program level. Therefore, impacts are considered potentially significant.	**MM AG-2: Agricultural Compatibility and Buffering:** For future discretionary development projects located adjacent to active agricultural operations, the project applicant shall prepare an agricultural compatibility assessment and incorporate appropriate measures to minimize land use conflicts between agricultural and urban uses. Such measures may include, but are not limited to: • Physical buffers, setbacks, walls, fences, roads, landscaped areas, or drainage features between agricultural and urban uses; • Disclosure statements notifying future residents of nearby agricultural operations and associated noise, dust, odors, lighting, pesticide application, and truck traffic; • Site design features that minimize sensitive receptor exposure to routine agricultural activities; and • Coordination with adjacent agricultural operators and the Imperial Irrigation District regarding access, irrigation facilities, and drainage infrastructure. The City shall review and approve proposed compatibility measures during project-level environmental review and discretionary permit processing.	Implementation of **MM-AG-2** would reduce impacts involving other changes in the existing environment that could result in conversion of Farmland to non-agricultural uses, though not to a less than significant level. Impacts on agricultural resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the type of Farmland and the characteristics of the proposed activity. The precise extent and nature of impacts that could result from the implementation of the project would be determined when specific project details are developed. Therefore, impacts would remain **significant and unavoidable**.
4.2 Air Quality			
Would the project conflict with or obstruct the implementation of the applicable air quality plan?	The proposed project is consistent with applicable Imperial County Air Pollution Control District (ICAPCD) air quality plans because it would accommodate planned growth consistent with SCAG regional forecasts used to develop those plans. Although the project would increase residential development potential to meet the City's RHNA, it would generally replace higher trip-generating commercial uses with residential uses, resulting in an overall reduction in daily vehicle trips and operational emissions compared to existing zoning. As a result, the project would not exceed the emissions assumptions used in the applicable air quality plans or conflict with their implementation.	Impacts would be less than significant. No mitigation is required.	Impacts would be less than significant.
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions	Operational emissions associated with implementation of the project would remain below applicable Imperial County Air Pollution Control District (ICAPCD) significance thresholds and would result in an overall reduction in operational emissions compared to existing zoning. However, construction of future discretionary development could generate significant emissions of PM10 and, for the Bowker Site, reactive organic gases (ROG), even with compliance with ICAPCD dust control requirements. Because the specific design and construction characteristics of future discretionary projects are not yet known, these	Emissions due to construction of the By-Right Development Sites would be less than significant. For all Discretionary Development Sites, construction emissions would be potentially significant and the following mitigation measures would be required: **MM AQ-1: Fugitive Dust Control:** Prior to commencing construction, the project applicant shall be required to submit an Enhanced Dust Control Plan to the Imperial County Air Pollution Control District (ICAPCD) for approval. The Enhanced Dust Control Plan shall identify all sources of particulate matter less than 10 microns (PM_{10}) emissions and associated	With implementation of mitigation measure **MM-AQ-3** would reduce architectural coating impacts to a level less than significant. Additionally, implementation of measures **MM-AQ-1** and **MM-AQ-2**, construction-related emissions associated with future Discretionary Development Sites would be reduced. However, because the

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
which exceed quantitative thresholds for ozone precursors)?	impacts would require mitigation at the program level. Construction emissions from by-right development sites would remain below applicable significance thresholds.	mitigation measures during construction (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Enhanced Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20 percent opacity performance standard for dust control and address the following parameters as stipulated in ICAPCD Regulation VIII – Fugitive Dust Control Measures: a) All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover. b) All on-site and off-site unpaved roads shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. c) All unpaved traffic areas 1 acre or more with 75 or more average vehicle trips per day shall be effectively stabilized, and visible emission shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at the delivery site after the removal of bulk material. d) The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at the delivery site after the removal of bulk material. e) All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. f) Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line. g) The construction of any new unpaved road is prohibited within any area with a population of 500 or more unless the road meets the definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be	level of fugitive PM10 reduction cannot be known at this time, construction-related impacts at Discretionary Development Sites would remain **significant and unavoidable.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering. In order to provide a greater degree of PM_{10} reductions, above that required by Regulation VIII, the ICAPCD recommends the following discretionary measures for fugitive PM_{10} control: a) Water exposed soil with adequate frequency for continued moist soil. b) Replace ground cover in disturbed areas as quickly as possible. c) Install an automatic sprinkler system on all soil piles. d) Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. e) Develop a trip reduction plan to achieve a 1.5 average vehicle ridership for construction employees. f) Implement a shuttle service to and from retail services and food establishments during lunch hours. **MM AQ-2: Construction Combustion Equipment:** Prior to commencing construction, the project applicant shall be required to submit a Construction Combustion Equipment Plan to the Imperial County Air Pollution Control District (ICAPCD) for approval. The ICAPCD requires that, regardless of the size of a project, all feasible standard measures for construction equipment must be implemented at construction sites. Standard measures from the ICAPCD handbook include the following: a) Use of alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel powered equipment. b) Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to five minutes as a maximum. c) Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. d) Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). To help provide a greater degree of reduction of particulate matter emissions from construction combustion equipment, the ICAPCD recommends the following enhanced measures: a) Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways. b) Implement activity management (e.g., rescheduling activities to reduce short-term impacts). **MM AQ-3: Low/No Volatile Organic Compound Architectural Coatings:** Prior to commencing construction, for projects that would result in reactive organic gas (ROG) emissions that exceed the applicable threshold, the project applicant shall be required to submit an ROG Reduction Plan to the City of Calexico for approval. It shall identify the maximum allowable volatile organic compound content limits (in grams per liter) for all required architectural coatings, as	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		defined in ICAPCD Rule 424, necessary to result in total ROG emissions that are less than 137 pound per day**.**	
Would the project expose sensitive receptors to substantial pollutant concentrations?	The proposed project would not expose sensitive receptors to substantial concentrations of carbon monoxide (CO) or toxic air contaminants (TACs). Traffic generated by future development would remain well below screening thresholds for localized CO hotspots. Construction-related diesel particulate matter (DPM) emissions would be temporary, intermittent, and subject to applicable CARB and ICAPCD regulations that limit equipment emissions and idling, resulting in less-than-significant impacts. Future stationary sources of TACs would be regulated through ICAPCD permitting requirements, and roadway traffic volumes would remain below CARB screening thresholds for mobile-source TAC exposure. In addition, future residential development would be required to comply with current building code air filtration standards.	Impacts would remain less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?	Construction activities could generate temporary odors from diesel equipment and architectural coatings; however, these would be localized, intermittent, and would not affect a substantial number of people. Long-term operation of future residential development would not introduce substantial odor-generating land uses. Existing odor issues associated with the New River are being addressed through ongoing State cleanup efforts and the approved New River Improvement Project.	Impacts would remain less than significant. No mitigation is required.	Impacts would be **less than significant**.
4.3 Biological Resources			
Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?	Implementation of the Housing Element would facilitate future development that could result in ground disturbance, vegetation removal, and construction activities with the potential to affect biological resources. A program-level biological evaluation found that while suitable habitat for special-status plants is generally absent, portions of the housing sites contain habitats that may support special-status wildlife, including burrowing owl, Yuma Ridgway's rail, and several bat species. Future development could result in habitat loss or disturbance to these species, as well as impacts to nesting birds protected under the Migratory Bird Treaty Act and California Fish and Game Code through vegetation removal, tree trimming, construction noise, lighting, and other activities. Because the Housing Element does not identify site-specific development proposals, the extent of these impacts cannot be determined at the program level, and impacts are considered potentially significant. Future Discretionary Development projects implemented under the proposed project would be subject to project-level environmental review pursuant to CEQA, as appropriate, during which site-specific biological surveys would be conducted if suitable habitat for special-status wildlife species is present as identified under **MM-BIO-1**. Both Discretionary and By-Right Development Sites would also be required to comply with applicable federal, State, and local regulations protecting special-status species, including the federal Endangered Species Act, California	**MM BIO-1**: **General Biological Survey and Report**. Applications for future development within the Discretionary Development Sites shall be required to comply with the following mitigation measure: Prior to issuance of any construction permit or any earth-moving activities within the Discretionary Development Sites, a site-specific general biological resources survey shall be conducted to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. A biological resources report shall be submitted to the project proponent to document the results of the biological resources survey. The report shall include: 1) the methods used to determine the presence of sensitive biological resources; 2) vegetation mapping of all vegetation communities and/or land cover types; 3) the locations of any sensitive plant or wildlife species; 4) an evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and 5) an evaluation of the significance of any potential direct or indirect impacts from the proposed project. If suitable habitat for sensitive species is identified based on the general biological survey, then focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report. If potentially significant impacts to sensitive biological resources are	Although future development accommodated by the proposed project has the potential to affect special-status wildlife species through habitat disturbance and construction activities, compliance with applicable biological resource regulations, project-level CEQA review, and implementation of mitigation measures MM-BIO-1 through MM-BIO-6 would reduce impacts to candidate, sensitive, and special-status species to **less than significant with mitigation**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	Endangered Species Act, California Fish and Game Code, Migratory Bird Treaty Act, and other applicable permitting requirements as part of the ministerial review process conducted by the City of Calexico in accordance with the Zoning Ordinance amendments pursuant to Program 2E in the Housing Element Update (i.e., promulgation of a new by-right development ordinance). Avoidance, minimization, and mitigation measures, including focused biological surveys, pre-construction nesting bird surveys, burrowing owl surveys, avoidance buffers, seasonal work restrictions, habitat preservation, and compensatory mitigation, would be identified as necessary during subsequent environmental review. In addition, implementation of **MM-BIO-1** through **MM-BIO-6** would require pre-construction biological surveys, avoidance and minimization of impacts to special-status species, nesting birds, and sensitive habitats, and implementation of species-specific protection measures where warranted. These measures would reduce direct and indirect impacts to special-status species to a less-than-significant level	identified, project-level grading and site plans shall incorporate project design features to avoid or minimize direct impacts on sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to a level less than significant. Future site-specific projects shall be required to obtain all necessary permits to ensure compliance with applicable federal, state, and local regulations, such as the federal and state Endangered Species Acts. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development. **MM BIO-2: Environmentally Sensitive Areas**. Environmentally Sensitive Areas identified within Discretionary Development Sites should be avoided to the maximum extent practicable. In areas near or adjacent to Environmentally Sensitive Areas (i.e., natural habitats and vegetation, wetlands, sensitive wildlife use-areas, wildlife corridors), the following measures should be followed: *Avoidance of Environmentally Sensitive Areas*. In areas near or adjacent to Environmentally Sensitive Areas, construction limits shall be clearly demarcated using highly visible barriers (such as silt fencing), which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas and routes of travel. The construction areas shall be limited to the minimal area necessary to complete the proposed project. The fencing shall remain in place until the completion of all construction activities and shall be promptly removed when construction is complete. *Biological Monitoring*. A qualified biological monitor shall conduct construction monitoring of all work conducted within/adjacent to Environmentally Sensitive Areas during all vegetation removal and ground-disturbing activities, such as staging and grading, for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprint and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as needed monitoring at the project sites shall occur. *Worker Environmental Awareness Program*. In areas near or adjacent to Environmentally Sensitive Areas, a qualified biologist shall conduct a Worker Environmental Awareness Program training session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of both federal and state Endangered Species Acts, the general measures that are being implemented to	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		conserve the species of concern as they relate to the proposed project, and the access routes and project site boundaries. *Best Management Practices*. During future proposed project construction activities, the following best management practices (BMPs) shall be implemented: • All equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities shall occur in developed or designated non-sensitive upland habitat areas. The designated upland areas shall be located to prevent runoff from any spills from entering Waters of the U.S. • A construction Storm Water Pollution Prevention Plan (SWPPP) and a soil erosion and sedimentation plan shall be developed (where requirements are met) to minimize erosion and identify specific pollution prevention measures that shall eliminate or control potential point and nonpoint pollution sources on-site during and following the project construction phase. The SWPPP shall identify specific BMPs during project construction to prevent any water quality standard exceedances. In addition, the SWPPP shall contain provisions for changes to the plan such as alternative mechanisms, if necessary, during project design and/or construction to achieve the stated goals and performance standards. • Trash shall be stored in closed containers so that it is not readily accessible to scavengers and shall be removed from the construction site on a daily basis. • Water quality shall be visually monitored by the biological monitor to ensure that no substantial increases in turbidity occur during construction. • All relevant natural resource permits and authorizations shall be obtained from appropriate agencies (i.e., USACE, RWQCB, and CDFW) prior to the initiation of construction activities. Permit conditions contained within the permits and authorizations shall be employed throughout the duration of the proposed project. • Hydrologic connectivity shall be maintained within drainages during the duration of construction. Brush, debris material, mud, silt, or other pollutants from construction activities shall not be placed within drainages and shall not be allowed to enter a flowing stream. • Dust control measures shall be implemented by the contractor to reduce excessive dust emissions. Dust control measures shall be carried out at least two times per day on all construction days, or more during windy or	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		dry periods, and may include wetting work areas, the use of soil binders on dirt roads, and wetting or covering stockpiles. • No pets shall be allowed in, or adjacent to, the project sites. • Rodenticides, herbicides, insecticides, or other chemicals that could potentially harm wildlife or native plants shall not be used near or within Environmentally Sensitive Areas within or near the roadway segments. • Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during the course of construction. • The cleaning of equipment shall occur at least 300 feet from Environmentally Sensitive Area fencing. *Use of Native Plants*. All project-related planting and landscaping shall not use plants listed on California Invasive Plant Council. Locally native plants shall be used near open space and native areas to the greatest extent feasible. No plants documented as noxious weeds by the California Department of Agriculture shall be used within planting or landscaping. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development. **MM BIO-3a: Burrowing Owl Focused Survey and Pre-Construction Survey**. Future development of Discretionary Development Sites determined to have potential to support burrowing owl shall be required to comply with the following measure: A qualified biologist shall be retained to conduct a habitat assessment and focused burrowing owl surveys in accordance with the California Department of Fish and Wildlife 2012 *Staff Report for Burrowing Owl Mitigation*. These focused surveys should be conducted either during the breeding season or non-breeding season in the year or months prior to the specific residential project if potential burrowing owl habitat is located within 500 feet of the proposed impact footprint for that project phase. Additionally, 14-day and a 24-hour pre-construction "take avoidance" surveys for burrowing owls are required by the California Department of Fish and Wildlife 2012 guidelines prior to initial ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, grading, tree removal, site watering, equipment staging and trenching/excavation) to ensure that no owls have colonized the site in the days or weeks	

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<tr><th>Threshold</th><th>Impact Discussion</th><th>Mitigation Measure</th><th>Significance After Mitigation</th></tr>
<tr><td></td><td></td><td>preceding the ground-disturbing activities. These take avoidance surveys are required both inside and outside of the breeding season whenever work would occur within 500 feet of potential burrowing owl habitat. Working in collaboration with the construction contractor, the qualified biologist will ensure these survey parameters (i.e., within 14 days and again within 24 hours prior to the start of the activity) are implemented. If burrowing owl are not detected during the take avoidance survey, no further action is required. If burrowing owl are detected, mitigation measure MM-BIO-3b shall be followed.
MM BIO-3b: Burrowing Owl Mitigation. A Burrowing Owl Take Avoidance Plan (BUOW Plan) shall be prepared by a qualified biologist. The BUOW Plan must be sent for approval by the California Department of Fish and Wildlife (CDFW) prior to initiating ground disturbance. The BUOW Plan shall include the number and location of occupied or known burrow sites, if applicable, and shall describe proposed avoidance (setback), shelter-in-place, unoccupied burrow/burrow surrogate collapse procedures, monitoring, minimization, and/or mitigation actions. The project proponent shall implement the BUOW Plan following CDFW review and approval. Avoidance and minimization measures may include:
a. <u>Setback</u>: No construction activities shall occur within specified setback distances. The default setback distances from the CDFW 2012 Staff Report are provided below.
<table><tr><th rowspan="2">Time of Year</th><th colspan="3">Level of Disturbance (meters/feet)</th></tr><tr><th>Low</th><th>Medium</th><th>High</th></tr><tr><td>April 1–Aug 15</td><td>200/656</td><td>200/656</td><td>500/1,640</td></tr><tr><td>Aug 16–Oct 15</td><td>200/656</td><td>200/656</td><td>200/656</td></tr><tr><td>Oct 16–Mar 31</td><td>50/164</td><td>100/328</td><td>500/1,640</td></tr></table>When setback distances are applied to occupied burrows, an intensive monitoring program shall be implemented to ensure that the setback distance applied to the burrow is considered an effective buffer. Once a setback distance is applied to an occupied burrow, the biological monitor shall be present at all times during construction activities that occur adjacent to the setback distance to monitor the burrowing owl's behavior. The biological monitor will have the authority to increase the setback distance if the construction activities are affecting the burrowing owl. Setback distances may be reduced through shelter-in-place methods described below, which would be determined by the biological monitor.
b. <u>Shelter in Place</u>: If a reduced setback is needed to complete construction, shelter-in-place can be implemented to minimize impacts while allowing existing burrows to remain intact. Where</td><td></td></tr>
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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		appropriate, the setback buffers may be reduced by screening burrows (i.e., installing hay bales to create a visual and auditory barrier between construction and the burrow) to minimize disturbance. During the breeding season, hay bales (or other similar material) shall be stacked up to three bales high and 25 feet on either side of the burrow for a total length of 50 feet. During the non-breeding season, hay bales shall be stacked up to two bales high and 25 feet on either side of the burrow for a total length of 50 feet. Hay bales are generally three feet long and 18 inches tall. A minimum distance of five feet between the hay bales and the occupied burrow shall be left, allowing for perches near the burrow to be maintained. The minimum distance may be increased depending on the slope and topography of the area adjacent to the burrows. If shelter-in-place is determined feasible, the biological monitor will provide guidance to the construction contractor regarding the location of the hay bales. During and following installation of the hay bales, a biological monitor shall be present daily to evaluate the effectiveness of the hay bales, monitor burrowing owl behavior for signs of stress or disturbance due to construction, and make adjustments to the buffer and/or hay bales in order to minimize impacts on the burrowing owl. If the burrowing owl continues to appear distressed from construction, the biological monitor will have the authority to halt construction until the project proponent and the CDFW can be contacted to determine the best course of action. Following installation of the hay bales, the biological monitor shall provide a report to the project proponent and the CDFW describing the installation time frame; a map of the area; photographs of hay bales and construction activities; and a description of site conditions (e.g., surrounding vegetation, topography, observed species, burrowing owl line-of-sight conditions). c. Burrow Collapse Procedures: No collapsing of occupied or known (i.e., those exhibiting signs of current or past burrowing owl use) burrows shall be conducted without a Section 2081 Incidental Take Permit, regardless of the time of year. Procedures for the collapse of unoccupied/potential (i.e., any subterranean hole three inches or larger for which no evidence is present to conclude that the burrow is being used or has been used by a burrowing owl) burrows shall be included in the BUOW Plan. Unoccupied and potential burrowing owl burrows may be excavated under the direct supervision of a qualified biologist after approval of the BUOW Plan.	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		d. If ground-disturbing activities occur but the site is left undisturbed for more than 14 days, another pre-construction "take avoidance" survey for burrowing owl shall be conducted and reported to CDFW as described above. If a burrowing owl is found, the same coordination described above shall be necessary. No take of burrowing owl shall be conducted unless the specific project secures a Section 2081 Incidental Take Permit from CDFW. Take includes any actions that could harm burrowing owl, including but not limited to burrow exclusions on occupied or known burrows, passive relocation activities, and burrow collapse of an occupied or known burrow. Those activities shall only be conducted in accordance with the permit conditions contained in an Incidental Take Permit. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development. **MM-BIO-4: Maternal Bat Roost Avoidance**. Prior to construction within any Discretionary Development Sites, the project proponent shall obtain a qualified biologist to conduct a survey of potential bat roosts for sensitive bat species, including western yellow bat, western mastiff bat, and pocketed freetailed bat, located within and/or immediately adjacent to the areas where project activities have the potential to directly impact active roosts or disrupt bat breeding activities. Potential roost sites (e.g., palm fronds, trees, rock crevices, abandoned buildings, etc.) will be identified by a qualified bat biologist and searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. If any project activities are proposed during the bat maternity season (April 1 through August 31), a qualified biologist will conduct a dusk emergent bat survey of potential roost sites that have signs of bat use no more than two weeks prior to construction. Dusk emergence count surveys shall be conducted on a warm night when nighttime lows are not less than 45 degrees Fahrenheit and during dry weather conditions. Surveys should be conducted from approximately 15 minutes before sunset to 1 hour after sunset. Prior to any dusk emergence count, the lead biologist shall identify the primary locations where bats may be roosting so these locations can be targeted during the emergence count. Surveys should include both a visual component using night vision goggles as appropriate, as well as an electronic acoustic monitoring device/bat detector (e.g., Anabat).	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		If bats are detected during the dusk emergence surveys, the project proponent shall not trim or remove the roost (e.g., palm trees) until it can be determined that the bats no longer are present. In addition, if a maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31). By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development. **MM-BIO-5: Yuma Ridgway's Rail Focused Survey**. If suitable freshwater marsh habitat is observed within the Discretionary Development Sites during the general biological survey, the following measure would apply: 1) Focused surveys for Yuma Ridgway's rail shall be performed prior to the start of construction activities. Surveys shall include the following: a) A permitted biologist, holding a U.S. Fish and Wildlife Service (USFWS) 10(a)1(a) Recovery Permit for the Yuma Ridgway's rail and a Memorandum of Understanding from the California Department of Fish and Wildlife (CDFW), will conduct focused surveys consistent with the Yuma Ridgway's Rail Survey Protocol for Project Evaluation. Surveys will be conducted within the project site and a 150-meter survey buffer. The current USFWS survey protocol requires surveys be conducted through a series of six survey passes between March 1 and May 15. b) All Yuma Ridgway's rail detections will be recorded on standardized data forms adapted from the National Marsh Bird Monitoring Program, and their locations will be recorded using GPS devices. c) The results of the surveys will be detailed in a 45-day letter report required by the permitted biologist's recovery permit and shall be submitted to USFWS and CDFW. One letter report will be provided to USFWS including methods and results of Yuma Ridgway's rail surveys, and a second letter report will be submitted to CDFW including methods and results of the Yuma Ridgway's rail surveys. 2) Construction in suitable marsh habitats shall occur between September 1 and February 28, which is outside the breeding season, whenever feasible. 3) Where work must occur during the breeding season, species-specific no disturbance buffers shall be established around all active nests, as determined by a qualified biologist in consultation with USFWS and CDFW. The buffer shall remain undisturbed until the nest is no longer active.	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		4) A qualified biological monitor shall be present during all ground-disturbing activities within or adjacent to rail habitat to ensure compliance with buffer zones and avoidance and minimization measures. 5) Noise attenuation measures shall be implemented near occupied rail habitat if work is to occur during the breeding season (typically March 1 to August 31). If predicted sound levels exceed 60 A-weighted decibels at the edge of the closest rail habitat, noise-reduction measures such as temporary sound walls or hay bale barriers shall be installed. Noise monitoring shall be conducted during construction to confirm effectiveness. 6) If an active nest is discovered during construction, work within the buffer shall cease until the nest is no longer active. Any observed mortality or disturbance shall be documented and reported to USFWS and CDFW. Additional measures shall be implemented if repeated disturbance occurs. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development. **MM-BIO-6: Avoidance of Nesting Birds and Raptors**. To prevent direct impacts to nesting migratory birds or raptors protected under the Migratory Bird Treaty Act and California Fish and Game Code, the project proponent shall implement the following within Discretionary Development Sites: Any proposed activity that could affect nesting migratory birds or raptors shall occur outside of the general bird breeding season of February 15 to August 31. If such activities cannot be conducted outside the general bird breeding season, a qualified biologist with experience in conducting nesting bird surveys shall be retained to conduct a pre-activity nesting bird survey (i.e., prior to any project activities, such as ground disturbance or vegetation removal, that could disrupt nesting birds). The pre-activity survey shall occur within 500 feet of the construction activity and no more than three days prior to the activities to confirm the presence or absence of active bird nests. If an active nest is found by the qualified biologist, a nest avoidance buffer of 300 feet for passerine birds and 500 feet for raptors should be demarcated by temporary fencing, flagging, and/or staking as deemed appropriate to avoid impacts. No project construction activities, including vegetation removal and/or trimming activities, will be allowed within the buffer until the qualified biologist has determined that the nest is no longer active. The qualified biologist shall monitor the active nest with sufficient frequency and duration to determine if the buffer distances are appropriately sized to protect the breeding success of the nest. Avoidance buffers may be either increased or decreased by the	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		qualified biologist based on such factors as the avian species involved, ambient levels of human activity, and screening vegetation.	
Would the project have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS?	Implementation of the Housing Element would facilitate future development that could result in vegetation removal, grading, and other ground-disturbing activities with the potential to affect sensitive natural communities. A program-level biological evaluation identified mesquite thickets, tamarisk scrub, and open water associated with irrigation canals as sensitive natural communities that may occur on several housing sites. Because the Housing Element is a program-level planning document and does not include site-specific development proposals, the location and extent of future impacts cannot be determined at this time. Potential impacts include the direct removal or modification of sensitive vegetation communities and indirect effects on adjacent aquatic resources through altered hydrology, dust, pollutants, or the spread of invasive species. Future discretionary development projects would be subject to project-level CEQA review, biological surveys, and compliance with applicable federal, State, and local regulations protecting sensitive habitats and jurisdictional waters. Where impacts cannot be avoided, projects would be required to obtain applicable permits and implement avoidance, minimization, restoration, and compensatory mitigation measures. In addition, implementation of Mitigation Measures **MM-BIO-1, MM-BIO-2,** and **MM-BIO-7a** through **MM-BIO-7c** would require biological surveys, protection of environmentally sensitive areas, and delineation, permitting, and mitigation for impacts to jurisdictional aquatic resources, reducing impacts to sensitive natural communities to a less-than-significant level.	Refer to Impact 1 above for Mitigation Measures **MM-BIO-1, MM-BIO-2.** **MM-BIO-7a: Formal Aquatic Resource Delineation**. Future development of Discretionary Development Sites, determined to have potentially jurisdictional aquatic resources via National Wetlands Inventory and National Hydrography Dataset data, aerial imagery, or field surveys shall be required to comply with the following measure: Prior to issuance of any construction permit, a formal, site-specific aquatic resources delineation and reporting per the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife standards and guidelines is recommended to confirm the extent of the aquatic resources on-site and anticipated jurisdictional status. The aquatic resources delineation shall be conducted following the agencies' standards and guidelines for determining the extent of jurisdictional resources present on-site. Regulatory aquatic resources permitting requirements would be assessed based on the results of the formal delineation and reporting. **MM-BIO-7b: Acquire Permits for Impacts to Jurisdictional Aquatic Resources**. Prior to construction or ground-disturbing activities occurring within potentially jurisdictional aquatic resources for any future development within the By-Right and Discretionary Development Sites, the project proponent shall apply for and obtain the following regulatory permits and approvals from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and/or California Department of Fish and Wildlife, as applicable: • Clean Water Act Section 404 Permit; • Clean Water Act Section 401 Water Quality Certification; and/or • California Fish and Game Code Section 1602 Streambed Alteration Agreement. **MM-BIO-7c: Mitigation for Jurisdictional Impacts**. The project proponent shall mitigate for permanent and temporary impacts to jurisdictional aquatic resources off-site in accordance with the applicable permit condition(s) described in **MM-BIO-7b**, estimated at no less than a 1:1 ratio. Temporary impacts are to be restored in place and permanent impacts shall include a minimum 1:1 establishment/re-establishment component, unless otherwise negotiated by the project proponent with the regulatory agencies. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.	Although implementation of the proposed project could result in impacts to sensitive natural communities where future development overlaps these resources, project-level environmental review, regulatory compliance, and implementation of mitigation measures would reduce impacts to **less than significant with mitigation**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project have a substantial adverse effect on wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Implementation of the Housing Element would facilitate future development that could involve grading, excavation, vegetation removal, and other ground-disturbing activities with the potential to affect wetlands and other jurisdictional waters. A program-level biological evaluation identified multiple housing sites that contain or may contain aquatic features, including irrigation canals and other potentially jurisdictional resources. Because the Housing Element is a program-level planning document and no site-specific development is proposed, the location and extent of future impacts cannot be determined at this time. As a result, potential impacts to wetlands and other jurisdictional aquatic resources are considered potentially significant. Future discretionary development projects would be required to conduct site-specific biological assessments and jurisdictional delineations, comply with applicable federal and State regulations, and obtain any necessary permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. In addition, implementation of Mitigation Measures **MM-BIO-1, MM-BIO-2,** and **MM-BIO-7a** through **MM-BIO-7c** would require biological surveys, avoidance and minimization of impacts, and appropriate mitigation for unavoidable impacts to aquatic resources. With these measures and regulatory compliance, impacts to wetlands and other jurisdictional waters would be reduced to a less-than-significant level.	Refer to Impact 1 above for Mitigation Measures **MM-BIO-1, MM-BIO-2,** and Impact 2 above for Mitigation Measures **MM-BIO-7a,** through **MM-BIO-7c.**	While future development facilitated by the proposed project has the potential to affect wetlands or other jurisdictional waters where present, compliance with applicable regulations, project-level environmental review, and implementation of mitigation measures would reduce impacts to **less than significant with mitigation**.
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Implementation of the Housing Element would facilitate future development that could result in vegetation removal, increased urbanization, and construction activities with the potential to affect localized wildlife movement and wildlife nursery sites. Although the City of Calexico does not contain any regionally significant wildlife corridors or native fish migration corridors, some housing sites include vegetation communities and canal-adjacent habitats that may provide foraging, cover, or movement opportunities for wildlife, as well as nesting habitat for migratory birds and roosting habitat for bats. Future development could disturb these habitats, including potential maternal bat roost sites, resulting in potentially significant impacts. Future discretionary development projects would be subject to project-level biological review and compliance with applicable federal and State wildlife protection regulations. In addition, implementation of Mitigation Measures **MM-BIO-1** and **MM-BIO-4** would require biological surveys and species-specific avoidance measures prior to construction, reducing impacts to wildlife movement, nursery sites, and other sensitive wildlife habitats to a less-than-significant level.	Refer to Impact 1 above for Mitigation Measures **MM-BIO-1** and **MM-BIO-4.**	With implementation of **MM-BIO-1** and **MM-BIO-4**, impacts to wildlife nursery sites would be mitigated to **less than significant with mitigation.**
Would the project conflict with the provisions of an adopted HCP,	There are no adopted or approved local, regional, or State HCPs or NCCPs specifically for or applicable to the City of Calexico. As such, implementation of the proposed project would not result in significant	No impact would occur. No mitigation is required.	**No impact** would occur**.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
NCCP, or other approved local regional, or state HCP?	impacts to the provisions of an adopted HCP, NCCP, or other approved local regional, or state HCP (Appendix D).		
Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Implementation of the proposed project would not result in any conflicts with or significant impacts to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Appendix D).	No impact would occur. No mitigation is required.	**No impact** would occur**.**
4.4 Cultural Resources and Tribal Cultural Resources			
Would the project result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Development that directly affects historic resources, or indirectly affects them by altering their surroundings, would be significant. Previously recorded cultural resources within 0.25 mile of the project area were identified. As noted in Section 4.4.1.2, only seven (7) historic resources were identified near the housing sites. Although few known significant historic resources exist in the City, the proposed project could affect known or unknown historical resources in Calexico. The project does not propose specific changes to known historic resources; however, future development within the housing sites could directly or indirectly affect resources, including buildings or structures 50 years old or older that may require significance evaluation. Direct impacts could include demolition, destruction, relocation, or alteration. Future projects must comply with applicable local and State historic resource requirements, but because site-specific footprints, designs, and schedules are not yet known, impacts are considered potentially significant.	Analysis of impacts from future development on the built environment would be required at the project level. Any alteration, relocation, demolition, or excessive groundborne vibration associated with future development that would affect historic buildings or structures over 50 years of age would represent a significant impact to historic resources. The following mitigation measures shall be applied to future development of all Discretionary Development Sites and By-Right Development Sites: **MM-CUL-1: Historic Evaluation**: For Discretionary Development, prior to approving a future project that would directly or indirectly affect a building or structure over 50 years old, a historic evaluation should be completed by a qualified architectural historian to determine where the affected building or structure is historically significant and eligible for the California Register of Historical Resources. The evaluation shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the California Environmental Quality Act guidelines. If the evaluation determines that the building/structure is not historic, no further evaluation or mitigation would be required. If the building/structure is determined to be historically significant, the preferred mitigation would be to avoid the resource through project redesign. If the resource cannot be avoided, all prudent and feasible measures to minimize or mitigate harm to the resource shall be taken per the recommendations of the City or qualified architectural historian prior to the demolition of the building. Development of By-Right Development Sites 23 and 36 shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.	The potential for future development to affect significant historic resources would be evaluated at the project level based on the location and characteristics of the proposed development and affected resources. Alteration, relocation, demolition, or excessive vibration could damage a historic structure, resulting in a significant impact. However, because the specific characteristics of future development are not known at the program level, even with implementation of **MM-CUL-1** for Discretionary Development Sites and applicable regulatory protections for By-Right Development Sites, it cannot be determined at the program level that impacts to significant historic resources would be fully avoided or reduced to a less than significant level. Therefore, impacts to historic resources would remain **significant and unavoidable**.
Would the project result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; religious uses or tribal cultural resources?	Significant impacts to archaeological or paleontological resources could occur if development affects previously unsurveyed, undeveloped land in Calexico, particularly near the New River. The Housing Element analysis focused on identified housing sites where future residential development could occur. A cultural resources records search was completed through the South Coastal Information Center for each site and a 0.25-mile buffer, and the Native American Heritage Commission	Mitigation is proposed for implementation of both discretionary and by-right development projects. Mitigation would either be applied during a future discretionary review or for by-right development as a requirement of the City's objective design and performance standards adopted as part of the project. Future development of housing sites would require implementation of the following mitigation framework:	The potential for ground-disturbing activities associated with future development could encounter and adversely affect known or previously unidentified archaeological resources, resulting in a potentially significant impact. However, because the specific

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	was asked to conduct a Sacred Lands File search and provide a tribal consultation list. The records search indicates most housing sites have been disturbed by agriculture or urban development, resulting in generally low potential for intact subsurface archaeological deposits. However, By-Right Sites 23 and 36 contain buildings that may be 50 years old or older and could contain significant historic-period archaeological deposits or historic built resources. Future development at these sites could affect historical resources without appropriate avoidance or treatment. Although no recorded prehistoric archaeological sites occur within the housing sites, unknown resources could be encountered during ground disturbance, particularly in less-disturbed areas. Because the Housing Element does not approve specific projects or grading, future impacts cannot be determined at the program level. Project-specific review would evaluate cultural resources and identify avoidance, preservation, or mitigation measures as needed.	**MM-CUL-2: Archaeological Resource Assessment:** For Discretionary Development, prior to approving a future project or issuance of grading permits, the City shall require applicants for future ground-disturbing projects to determine the presence or absence of archaeological resources and appropriate mitigation measures. Following are steps to complete an assessment: 1. A qualified archaeologist meeting the Secretary of the Interior Standards shall conduct a cultural resources pedestrian survey and request a sacred lands search from the Native American Heritage Commission. 2. If an archaeological resource is identified that has not been evaluated for significance per California Environmental Quality Act thresholds, then an evaluation program shall be completed. 3. If the resource is determined to be significant and avoidance through project redesign is not feasible, a data recovery and construction monitoring program shall be implemented to reduce impacts to the archaeological resource to below a significant level. 4. After construction, a final data recovery and monitoring report shall be submitted to the City. Confidential attachments must be submitted under separate covers. Any artifacts collected during the evaluation, data recovery, and monitoring efforts shall be curated at an appropriate facility or repatriated to a local Native American tribe if requested during Assembly Bill 52 consultation. For development of By-Right Sites 23 and 36, the City's By-Right Ordinance[1] requires the following: **MM-CUL-3: Construction Monitoring**: A qualified Native American monitor shall be on-site during earth-disturbing activities at By-Right Sites 23 and 36 because there is a potential for buried significant historic cultural resource deposits given that houses on these sites may be or are over 50 years old. Additionally, any mitigation measures developed through the Assembly Bill 52 Tribal consultation process shall also be completed. If cultural resources are identified during construction monitoring, the archaeological monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery. The archaeological monitor shall contact the City Project Manager at the time of discovery and, in consultation with the City Project Manager, shall determine the significance of discovered resources. Isolates and non-significant deposits shall be minimally documented in the field. If the discovery is determined to be significant, a research design and data recovery program shall be prepared by the project archaeologist and approved by the City Project Manager. Construction activities shall be allowed to resume after the City Project	characteristics of future development are not known at the program level, even with implementation of **MM-CUL-2** and **MM-CUL-3**, it cannot be determined that impacts to significant archaeological resources would be fully avoided or reduced to a less than significant level. Therefore, impacts to archaeological resources would remain **significant and unavoidable**.

[1] The City's By-Right Ordinance amends the Zoning Ordinance consistent with Program 2E of the Housing Element Update, establishing a ministerial review process for By-Right Development Sites.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		Manager has concurred with the significance evaluation and data recovery program	
Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?	No known burial sites or cemeteries occur near the housing sites; therefore, construction is not expected to disturb human remains. If human remains are discovered, California PRC Section 5097.98 and Health and Safety Code Section 7050.5 would apply, including consultation with the NAHC-identified Most Likely Descendant, the coroner, and applicable Native American tribes. The City would also comply with State and federal NAGPRA requirements and AB 52 consultation. Because regulations govern inadvertent discoveries during grading, impacts would be less than significant.	Impacts to human remains would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
4.5 Geology and Soils			
Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); (ii) strong seismic ground shaking? (iii) seismic-related ground failure, including liquefaction; or (iv) landslides? or	Implementation of the Housing Element would facilitate future development in a seismically active region where people and structures could be exposed to earthquake hazards, including strong ground shaking, liquefaction, subsidence, and unstable soils. However, the City is located approximately six miles west of the nearest Alquist-Priolo Earthquake Fault Zone, making the potential for surface fault rupture low. In addition, Calexico is not located within a mapped liquefaction hazard zone, and its generally flat topography results in a low potential for landslides, with only limited localized susceptibility near the New River and irrigation canals. Although some housing sites contain soils with low bearing strength, the Housing Element is a program-level planning document and does not approve site-specific development. Future development would be required to comply with the California Building Code, local development standards, and applicable geotechnical investigation requirements, including site-specific analyses of seismic hazards, soil conditions, foundation design, and slope stability where warranted. These requirements are intended to ensure that structures are designed to withstand seismic events and that site-specific geologic hazards are appropriately addressed during project-level review. Accordingly, impacts related to fault rupture, strong seismic ground shaking, liquefaction, subsidence, landslides, and unstable geologic units or soils would be less than significant.	The project does not approve any new or additional development and instead is a policy level document intended to guide future housing growth. Any new development would be subject to site-specific CEQA analysis. Adherence to the CBC which requires new buildings and structural additions to be constructed to resist the seismic forces, as well as the preparation of site-specific geotechnical investigations where soil or foundation conditions need evaluation to assess the degree of potential seismic hazards, would ensure appropriate design measures for any parcel-specific construction are followed to reduce potential geologic hazards. Compliance with these regulatory requirements would ensure that future projects result in less than significant impacts related to seismic hazards and unstable geology. No mitigation is required.	Impacts would be **less than significant.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			
Would the project result in substantial soil erosion or the loss of topsoil?	According to the Imperial Valley Area Soil Survey, City soils are nearly level, with slopes generally under two percent and low natural erosion rates. However, future development could cause construction-related erosion and topsoil loss. Projects disturbing one or more acres must comply with the NPDES Construction Stormwater General Permit, including a site-specific SWPPP with BMPs to reduce erosion and sedimentation. Imperial County Air Pollution Control District Rules 800–806 also require fugitive dust controls, including stabilizers, to limit erosion. Operational projects must also comply with MS4 General Permit requirements for pollutant reduction and post-construction stormwater controls. Compliance with these regulations would ensure less-than-significant impacts related to soil erosion and topsoil loss.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Soils in and around Calexico range from very fine sands to silty clays derived from ancient lakebed deposits. Some may be expansive, with shrink-swell potential that can damage foundations, pavement, and utilities if not addressed during design and construction. CBC requirements for engineered subgrade, slab reinforcement, drainage features, and design-level geotechnical investigations would address expansive soils and other geologic constraints before building permits are issued. Where needed, reports would recommend soil treatment or engineered fill. Compliance with CBC requirements would reduce expansive soil impacts to a less-than-significant level; no mitigation is required.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Due to the urban and built out nature of the City, there is no expectation that septic tanks or alternative wastewater disposal systems would be part of any future development proposal. As discussed in Section 4.13, Utilities and Service Systems, all future housing development in the City would be served by the City of Calexico Wastewater Treatment Plant (WWTP) for wastewater service. No impacts would occur related to the use of septic tanks or alternative wastewater disposal systems as all sites would connect to the public wastewater system.	No impact would occur. No mitigation is required.	**No impact** would occur.
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	The moderate paleontological resource potential of the Lake Cahuilla Beds suggests the potential for future development within the City to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed	**MM GEO-1: Paleontological Resources Monitoring**: To address potential impacts to paleontological resources, the City shall review project application materials, including any geotechnical investigations, to determine whether proposed grading or excavation activities have the	With implementation of **MM-GEO-1**, impacts associated with paleontological resources would be

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	deposits of this geologic unit have the potential to impact the paleontological resources preserved therein. For example, the housing sites are located on Quaternary Lake deposits, which could underly formations with paleontological sensitivity. At a program level of review, it is not possible to investigate each individual site to determine the depth of geologic formations and identify their associated paleontological sensitivity. If grading were to occur at depths sufficient to disturb a moderate sensitivity geologic formation with potential paleontological resources, significant impacts could result. Potential impacts to paleontological resources could be significant without mitigation.	potential to disturb geologic formations with moderate or high paleontological sensitivity. If ground-disturbing activities are limited to previously disturbed soils or surficial deposits with low paleontological sensitivity, no monitoring shall be required. The City may require the applicant to provide information regarding grading depths, geologic formations, and paleontological sensitivity to determine the potential for impacts. If grading or excavation activities may disturb geologic formations with moderate or high paleontological sensitivity, the following measures shall be implemented prior to and during ground-disturbing activities: 1. **Preconstruction Personnel and Repository.** Prior to the issuance of grading permits, the applicant shall retain a qualified paleontologist to oversee implementation of the mitigation program. A qualified paleontologist shall possess a graduate degree in paleontology, geology, or a related field and have demonstrated experience in paleontological resource identification, monitoring, and mitigation within southern California. A qualified regional repository, such as a museum or university collection that meets professional curation standards, shall be identified to receive any recovered fossil specimens. 2. **Preconstruction Meeting.** The qualified paleontologist shall attend a preconstruction meeting with grading and excavation contractors to review excavation schedules, paleontological monitoring procedures, fossil recovery protocols, and site safety requirements. 3. **Worker Environmental Awareness Training.** Prior to commencement of grading activities, the qualified paleontologist shall provide paleontological resource awareness training to construction personnel involved in ground-disturbing activities. Training shall include the identification of fossil resources, reporting procedures, and avoidance requirements. 4. **Construction Monitoring.** A qualified paleontological monitor working under the direction of the qualified paleontologist shall monitor grading and excavation activities in areas underlain by geologic units with moderate or high paleontological sensitivity. Monitoring shall occur during original excavation of previously undisturbed native sediments and continue as determined necessary by the qualified paleontologist. 5. **Fossil Recovery.** If paleontological resources are encountered, the qualified paleontologist or paleontological monitor shall evaluate and recover the resources. Construction activities within the immediate vicinity of the discovery may be temporarily redirected, diverted, or halted, as necessary, to allow for the identification, documentation, and recovery of significant fossil specimens.	reduced to **less than significant with mitigation.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		6. **Laboratory Treatment.** Recovered fossil specimens shall be cleaned, stabilized, identified, cataloged, and prepared in accordance with current professional paleontological standards. 7. **Curation.** All scientifically significant fossil specimens, together with associated field notes, photographs, maps, and other documentation, shall be curated at the designated repository in accordance with repository requirements and accepted professional standards. 8. **Final Report.** Upon completion of monitoring and mitigation activities, the qualified paleontologist shall prepare a final paleontological resources report documenting the results of the monitoring program, the geologic units encountered, fossil discoveries, recovery methods, and curation information. The report shall be submitted to the City and retained as part of the project record.	
4.6 Greenhouse Gas Emissions			
Would the project result in GHG emissions that may have a significant impact on the environment?	The project would increase greenhouse gas (GHG) emissions compared to existing conditions because it would facilitate future development on currently vacant or underutilized sites. Although full buildout under the proposed land use designations would generate fewer GHG emissions than buildout under existing zoning due to reduced vehicle trips, emissions would still exceed the existing baseline. Several by-right and discretionary housing sites, as well as the Bowker industrial site, have the potential to exceed the recommended project-level screening threshold of 3,000 metric tons of CO2e per year. Future discretionary projects would undergo project-level environmental review and implement GHG reduction measures, as appropriate; however, there is no mechanism to require such measures for by-right development.	**MM-GHG-1**: Applications for future development, wherein the City of Calexico (City) or their designee has determined a potential for greenhouse gas (GHG) impacts, the City shall evaluate the project to identify the potential for GHG emissions to exceed the South Coast Air Quality Management District (SCAQMD) thresholds detailed below. If a project may exceed the thresholds, the City shall require a technical assessment evaluating potential project GHG impacts to the City for review and approval. The significance of project-level GHG impacts shall be evaluated using one of the following criteria: 1. In the absence of a City plan to reduce GHG emissions, the evaluation shall be prepared in conformance with SCAQMD methodology for assessing GHG impacts, which consists of the following tiered approach: a. Tier 1 – The project is exempt from the California Environmental Quality Act. b. Tier 2 – The project is consistent with an applicable regional GHG emissions reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. c. Tier 3 – Project GHG emissions represent an incremental increase below or mitigated to less than a 3,000 metric tons of carbon dioxide equivalent screening level. d. Tier 4 – The project achieves performance standards, where performance standards may include a percent emission reduction target or an efficiency target per service population. e. Tier 5 – Offsets along or in combination with the above the target Significance Screening Level. Offsets must be	Although buildout of the project would result in a decrease in GHG emissions when compared to buildout of the adopted land use and zoning designations, implementation of the project would still facilitate new development that would generate GHG emissions above existing baseline conditions. Specifically, future individual development could generate GHG emissions that exceed project-level thresholds. Project-specific GHG emission impacts would be evaluated and addressed consistent with mitigation measure **MM-GHG-1**. However, because the design and operational characteristics of future development projects are not currently known, the level to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, despite the overall reduction in emissions compared to the adopted land use plan, after mitigation, program-level GHG impacts associated with emission levels would remain **significant and unavoidable**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		provided for a 30-year project life, unless the project life is limited by permit, lease, or other legally binding condition. If GHG emissions are determined to have the potential to exceed the SCAQMD's recommended thresholds, the City shall require that applicants for new development projects incorporate features to reduce GHG emissions. These identified measures shall be incorporated into all appropriate documents submitted to the City and shall be verified by the City. Measures can include, but are not limited to, the following: • **Affordable Housing**. Provide below-market-rate housing. • **Electric Vehicle Parking**. Implement electric vehicle charging infrastructure beyond requirements set forth in the 2022 California Green Building Standards Code mandatory measures, such as Tier 2 voluntary measures set forth in the 2022 California Green Building Standards Code (or future more stringent) standards. • **Transportation Demand Management**. Implementation of transportation demand management measures. • **Unbundling Parking**. Require residential developers to separate the cost to rent or purchase a parking space from the cost of the unit. • **Transit Subsidies**. Require implementation of a transit subsidy program that covers a portion of the cost of transit passes on a per-unit basis to residential tenants for a period of five years after issuance of the first occupancy permit. The Owner/Permittee shall provide an annual report to the City Engineer in each of the first five years demonstrating how the offer was publicized to residents and documenting the results of the program each year, including the number of participants and driveway traffic counts. • **Commute Trip Reduction Program**. Develop and implement a commute trip reduction program that requires each homeowner and tenant to be provided with a one-page flyer every year that provides information regarding available transit, designated bicycle routes, local bicycle groups and programs, local walking routes and programs, and rideshare programs. • **Active Transportation Network**. Expand and facilitate completion of planned networks of active transportation infrastructure for projects that are required to provide public improvements related to that infrastructure. • **Bicycle Micro-mobility Fleet**. Provide bicycles to the first buyer of each unit. • **All Electric Development**. Require all-electric development with no sources of natural gas. • **Energy Efficiency**. Demonstrate building energy efficiency beyond applicable code requirements.	

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		• **Energy Star Appliances**. Provide Energy Star-rated appliances (e.g., clothes washers, dishwashers, refrigerators, and ceiling fans). • **Alternative Water Heating**. Incorporate non-gas water heaters (e.g., electric or solar water heating). • **Water-Efficient Landscaping**. Provide low-water use/drought tolerant plant species with low water use irrigation (e.g., spray head or drip), where required. • **Outdoor Electrical Outlets to Allow for Electric Landscape Equipment**. Provide exterior electrical outlets necessary for sufficient powering of electric lawnmowers and other landscaping equipment.	
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	The proposed project was evaluated for consistency with the State's 2022 Climate Change Scoping Plan, the Regional Climate Action Plan, and SCAG's Connect SoCal 2024. While the project is generally consistent with many of the planning strategies that promote infill development and reduced vehicle travel, it is a program-level planning document that does not include sufficient project-specific information to demonstrate consistency with all applicable greenhouse gas (GHG) reduction measures. Although buildout under the proposed land use designations would reduce GHG emissions compared to buildout under existing zoning, it would increase emissions relative to existing conditions, and some future development could exceed project-level GHG screening thresholds.	Impacts associated with applicable plans, policies, and regulations intended to reduce GHG emissions adopted for the purpose of reducing the emission of GHGs would be significant. Refer to **MM-GHG-1** above to reduce impacts to policies, plans, and regulations.	Although future development would be required to evaluate and reduce project-specific GHG emissions consistent with **MM-GHG-1** as described above in Section 4.6.5.2, because the design and operational characteristics of future development projects are unknown, the extent to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, after mitigation, program-level GHG impacts would remain **significant and unavoidable.**
4.7 Hazards and Hazardous Materials			
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Implementation of the Housing Element would facilitate future development that could involve the use of limited quantities of hazardous materials during construction and operation, including fuels, lubricants, solvents, cleaning products, and, at certain sites, industrial materials associated with manufacturing activities. Development could also increase the interface between residential neighborhoods and surrounding agricultural lands, potentially increasing exposure to agricultural pesticides. However, the project does not include the routine transport, use, or disposal of hazardous materials beyond activities typically associated with urban development. Future construction and operation would be required to comply with all applicable federal, State, and local regulations governing the transportation, storage, use, and disposal of hazardous materials and wastes, including spill prevention, emergency response, and hazardous waste management requirements. In addition, agricultural pesticide use is regulated by the appropriate agencies, and the Calexico General Plan requires buffers between residential and agricultural uses where	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	appropriate. Compliance with these regulatory requirements would minimize potential risks to the public and the environment, and impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.		
Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Implementation of the Housing Element would facilitate future development that would involve the temporary use of hazardous materials during construction, including fuels, lubricants, paints, and solvents, as well as the routine use of common household hazardous products during operation. Although accidental spills could occur, these materials would be used in relatively small quantities and managed in accordance with applicable federal, State, and local regulations governing hazardous materials handling, storage, disposal, worker safety, and emergency response. Future development projects would also be subject to hazardous materials management, spill prevention, and reporting requirements, including preparation of Business Emergency Plans where applicable, with oversight by the City, Imperial County, and other regulatory agencies. Compliance with these requirements would minimize the potential for accidental releases of hazardous materials that could pose a significant hazard to the public or the environment. Therefore, impacts associated with reasonably foreseeable upset and accident conditions involving hazardous materials would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Implementation of the Housing Element would facilitate residential development in proximity to existing schools throughout the City. However, residential uses generally do not involve the routine use, handling, storage, or disposal of hazardous materials in quantities that would pose a substantial risk to nearby schools or sensitive receptors. The proposed industrial rezoning of the Bowker site is not located within one-quarter mile of an existing or proposed school and would be subject to applicable hazardous materials regulations and City review procedures. Construction activities associated with future development could involve the temporary use of hazardous materials. Improper handling or storage of these materials could result in accidental releases; however, construction activities would be required to comply with applicable federal, state, and local regulations governing hazardous materials management, worker safety, spill prevention, and emergency response. Compliance with these requirements would minimize potential risks to schools and surrounding communities. Therefore, impacts associated with the release or handling of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project be located on a site that is included on a list of hazardous materials sites	Implementation of the Housing Element would not result in significant impacts associated with existing hazardous materials sites. None of the identified housing sites overlap with active hazardous materials sites	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	listed in EnviroStor or GeoTracker. Although the Former CA Fun Mart site is adjacent to one housing site, available records do not indicate a potential risk of off-site exposure, and the only housing site located within a listed cleanup program area is inactive or identified as requiring no further action. Future development projects would be subject to site-specific environmental review and would be required to comply with applicable federal, State, and local regulations governing hazardous materials investigation, remediation, and management. If contamination is identified during project implementation, appropriate regulatory oversight, further investigation, and remediation would be required. Compliance with existing hazardous materials regulations and agency requirements would minimize potential exposure risks; therefore, impacts related to sites listed pursuant to Government Code Section 65962.5 would be less than significant.		
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?	Several housing opportunity sites are located within Airport Land Use Compatibility Plan (ALUCP) safety zones, including portions of sites within Zones 3 and 6. However, the Housing Element is a program-level planning document that identifies potential housing capacity but does not approve or authorize development, establish final densities, or determine site-specific design features that would affect airport compatibility. Future development proposed subject to project-level review for consistency with the applicable ALUCP may also be subject to MM HAZ-1, which requires reviews, easement, and design requirements be met. However, because the specific characteristics of future development and site conditions are not known at this program level, it cannot be determined whether the mitigation would reduce impacts to less than significant. As such, impacts would remain significant and unavoidable.	**MM-HAZ-1: Airport Compatibility Hazards.** For any Discretionary or By-Right development project identified in the Housing Element that is subject to review under the Imperial County Airport Land Use Compatibility Plan (ALUCP) and is determined to be inconsistent with the applicable ALUCP, the City shall require the project applicant to implement the following measures, as applicable: 1. Prior to approval of the applicable discretionary development entitlement, the project applicant shall submit the proposed development to the federal Aviation Administration (FAA) for aeronautical review and obtain the applicable FAA determination prior to approval of the project. If the FAA issues a Determination of No Hazard to Air Navigation with conditions, the project shall comply with all applicable conditions of that determination. The FAA's obstruction evaluation process applies to proposed construction or alterations that may affect navigable airspace. 2. Prior to issuance of building permits, the project applicant shall record an avigation easement over the project property in favor of the applicable airport owner/operator, where required by the ALUCP. The easement shall be in a form acceptable to the City and shall acknowledge the right of aircraft to overfly the property, including associated aircraft noise and other effects of normal airport operations. The applicant shall also provide notice of the property's proximity to the airport and associated aircraft overflight and noise conditions to present and future property owners and occupants, as applicable. 3. Prior to issuance of building permits, the project applicant shall demonstrate to the Calexico Planning and Building Division that the final project design incorporates the following measures to reduce potential hazards associated with aircraft operations: a. All outdoor lighting shall be designed, located, and installed so that it is hooded, shielded, or otherwise	Because the specific characteristics of future development and site conditions are not known at this program level, it cannot be determined whether the mitigation would reduce impacts to less than significant. As such, impacts would remain **significant and unavoidable**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		directed downward to prevent direct light spillage or reflection into the sky and to minimize the potential for confusion with airport or aircraft navigation lighting. b. Residential structures shall incorporate noise attenuation measures, as determined by a qualified acoustical consultant, sufficient to achieve an interior aircraft noise level of 45 CNEL or less in habitable rooms. The acoustical analysis and proposed attenuation measures shall be reviewed and approved by the City prior to issuance of building permits, and the measures shall be incorporated into the final building plans and implemented during construction. 4. If the City Council elects to overrule an ALUC determination that a proposed development is inconsistent with the applicable ALUCP, the project applicant shall enter into a Defense and Indemnification Agreement with the City, in a form acceptable to the City Attorney, as a condition of project approval. These requirements shall be incorporated into the project's conditions of approval and, where applicable, the project's recorded covenants, conditions, and restrictions (CC&Rs), so that the requirements remain applicable to subsequent property owners and occupants.	
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Future development would increase population and vehicle trips; however, the proposed project does not propose the closure, relocation, or modification of existing roadways identified as critical emergency response and evacuation routes or propose new roadways that would interfere with an adopted emergency response plan or emergency evacuation plan. Future development accommodated under the proposed project would be required to maintain adequate emergency access during both construction and operation. Additionally, future development would be required to comply with applicable federal, state, and local regulations to ensure adequate access for emergency vehicles. Therefore, development facilitated by the proposed project would not physically obstruct emergency routes or interfere with implementation of adopted emergency response procedures. The impact related to emergency response and evacuation plans would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	As discussed in Section 4.7.1.2 and Section 4.15 Wildfire, portions of the City and the proposed project are in Moderate High FHSZs and WUI designation areas identified by CAL FIRE. As described in Section 4.15 Wildfire, future development would be required to comply with applicable federal, state, and local regulatory requirements, which would reduce the risk of significant loss, injury, or death related to wildland fires. As such, implementation of the proposed project would not expose people or structures, either directly or indirectly, to a	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	significant risk of loss, injury, or death involving wildland fires. Impacts related to wildland fires would be less than significant.		
4.8 Hydrology and Water Quality			
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? or Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Implementation of the Housing Element would facilitate future residential and industrial development that could result in construction and operational activities such as grading, excavation, and soil stockpiling which could increase erosion, sedimentation, and the potential release of pollutants from existing agricultural or commercial uses and construction-related materials. However, future development involving soil disturbance would be required to comply with applicable stormwater regulations, including the NPDES Construction General Permit, which requires implementation of erosion and sediment control measures, preparation of Stormwater Pollution Prevention Plans (SWPPPs) where applicable, and incorporation of best management practices (BMPs) to minimize pollutant discharges. Operational activities associated with future development could generate typical urban runoff pollutants, including sediment, oils and grease, pesticides, fertilizers, trash, and vehicle-related contaminants. Future projects would be required to comply with the City's General Plan, Municipal Code, Storm Water Program, MS4 Permit requirements, Water Quality Improvement Plan, BMP Design Manual, and other applicable water quality regulations. Through implementation of required stormwater controls, BMPs, and regulatory compliance, future development would minimize potential impacts to surface and groundwater quality and would not violate water quality standards, waste discharge requirements, or impede implementation of applicable water quality control plans. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Implementation of the Housing Element would facilitate future development within the Imperial Valley Groundwater Basin; however, the City of Calexico does not rely on groundwater supplies due to existing water quality concerns and does not anticipate groundwater becoming a source of supply through the planning horizon. Future development is also not expected to use groundwater during construction or operation. Development sites are located within an already urbanized area and future development would occur within the context of existing water management practices, therefore these changes are not expected to substantially interfere with groundwater recharge or reduce groundwater supplies. Therefore, impacts related to groundwater supplies and recharge would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or	Implementation of the Housing Element would facilitate future development that could result in temporary construction-related erosion, changes in surface runoff, and increased stormwater flows associated with new impervious surfaces. Construction activities such as grading, excavation, and soil stockpiling could increase the potential	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
through the addition of impervious surfaces, in a manner which would: a. result in a substantial erosion or siltation on- or off-site; b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or d. impede or redirect flood flows?	for erosion and sediment transport; however, future development would be required to comply with the City's erosion and sediment control requirements, NPDES Construction General Permit requirements, and applicable stormwater best management practices (BMPs). Operational changes to drainage patterns and runoff would be managed through compliance with the City's Post-Construction Standards Plan, Municipal Code Chapter 13.50 (Urban Storm Water Management), Phase II MS4 Permit requirements, and project-specific drainage and stormwater management measures. Future development would also be required to incorporate low-impact development (LID) features and other stormwater controls to retain and treat runoff, maintain existing drainage patterns, and prevent increases in erosion, flooding, or pollutants entering the storm drain system. Projects would be required to prepare applicable stormwater quality management plans, erosion control plans, and drainage studies, and may be required to provide drainage improvements through applicable development impact fees. Because future development would occur outside mapped 500-year flood hazard areas and would be subject to site-specific stormwater and flood control requirements, implementation of the Housing Element would not substantially increase erosion or siltation, alter drainage patterns, exceed stormwater system capacity, or impede flood flows. Impacts would be less than significant.		
Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Implementation of the Housing Element would not directly authorize development within flood hazard areas but would facilitate future development on identified housing sites throughout the City. The housing sites are located outside mapped floodplains and flood hazard areas associated with the New River. The City's General Plan and Municipal Code Chapter 15.54 (Flood Damage Prevention) restrict development within floodways and require appropriate engineering review and flood protection measures where development may affect flood flows. In addition, required stormwater retention, infiltration, and runoff management measures would minimize the potential for future development to contribute to flooding. Therefore, impacts related to flood hazards would be less than significant. The City is located approximately 100 miles inland from the Pacific Ocean and is not located within a tsunami hazard area. Additionally, no known state-designated seiche hazard zones occur within or adjacent to the City, and the City's flat topography and lack of large water bodies reduce the potential for earthquake-induced seiches or mudflows. Therefore, implementation of the Housing Element would not result in risks associated with tsunamis, seiches, or mudflows, and no impacts would occur.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
4.9 Land Use and Planning			

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project physically divide an established community?	The proposed project does not propose the construction of a linear feature that would impact mobility within the existing community and surrounding area that could physically separate or isolate portions of the community. Future development is located within the City's existing established communities and are currently served by existing roadway networks, utilities, and municipal infrastructure. While future development could increase residential density and population in certain areas of the City, such development would occur within the context of the existing urban environment and would not disrupt established access, circulation patterns, or community cohesion. Therefore, the proposed project would not introduce land uses or physical features that would divide existing neighborhoods or communities.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact?	The proposed project would update the City's Housing Element to comply with State housing law requirements, amend related General Plan elements for internal consistency, and update the Zoning Ordinance to reflect adopted Housing Element policies. As described in Table 4.10-1, Project Consistency with Land Use Plans and Policies, the project would not conflict with applicable land use plans, policies, or regulations adopted except for the applicable Airport Land Use Compatibility Plan (ALUCP) due to potential development within the Safety Zones that would exceed the density levels cited in the ALUCP. Future development projects within the safety zones would be subject to project-level review for consistency with the Imperial County ALUCP, FAA review and determination, and per MM HAZ-1 recordation of an avigation easement and project design requirements. Compliance with these requirements would reduce safety hazards, but not fully eliminate the impact.	Implementation of **MM HAZ-1** (see above) would reduce the project's potential exposure to aircraft safety hazards and/or would ensure appropriate coordination with the applicable airport land use authority. However, **MM HAZ-1** would not entirely eliminate the proposed project's potential risks associated with the underlying inconsistency with the ALUCP.	Implementation of **MM-HAZ-1** would reduce, but would not fully eliminate, the potential environmental effects associated with the project's inconsistency with the applicable ALUCP. Therefore, the impact would remain **significant and unavoidable**.
4.10 Noise			
Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Future development facilitated by the project would increase traffic noise; however, no existing noise-sensitive receptors are located along roadway segments where noise increases would exceed applicable screening thresholds. Some housing sites could be exposed to traffic noise levels above the City's compatibility standards, but future development would be subject to site-specific noise studies and compliance with General Plan policies to ensure interior and exterior noise standards are met. Construction noise would be temporary and regulated through the City's Noise Ordinance. Potential stationary noise associated with future industrial development at the Bowker Site would be evaluated during subsequent project-level environmental review, and mitigation would be required to ensure compliance with applicable noise standards.	Stationary noise impacts related to potential industrial noise generated at the Bowker Site would be significant and require mitigation. The following mitigation measures shall be applied to the Discretionary Development Site #24b, the Bowker Site: **MM-NOS-1: Bowker Site Industrial Noise Sources.** Prior to the issuance of building permits for the Bowker Site, a site-specific noise analysis shall be prepared that evaluates noise levels generated by on-site equipment and activities. The noise study shall include noise reduction measures necessary to reduce noise levels to the applicable limits established in Section 8.46.031 of the City's Municipal Code.	With implementation of **MM NOS-1**, noise impacts associated with the Bowker Site would be reduced to **less than significant with mitigation**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Future development facilitated by the project could temporarily increase construction noise and vibration and incrementally increase operational traffic noise. Traffic noise increases would not significantly affect existing noise-sensitive receptors, and future development would be required to comply with the City's Noise Element, Municipal Code, and applicable noise standards, including preparation of site-specific noise studies where required. Groundborne vibration impacts associated with construction activities would be potentially significant, and mitigation would be required. Railroad vibration and excessive airport noise would not result in significant impacts. Potential stationary noise associated with future industrial development at the Bowker Site could be significant.	**MM-NOS-2: Construction Vibration.** For Discretionary Development, prior to issuance of a building permit for a project requiring heavy construction equipment such as large bulldozers within 20 feet of fragile buildings, 12 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or 8 feet of engineered concrete and masonry buildings, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed federal Transit Administration architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded. By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development	With implementation of **MM NOS-2**, groundborne vibration impacts associated with the Discretionary Development Sites and By-Right Development Sites within close proximity to structures would be reduced to **less than significant.**
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, and expose people residing or working in the area to excessive noise levels?	The Calexico International Airport is located in the southwest portion of the City. The 60 CNEL noise contours do not extend beyond the airport property boundaries. Therefore, adjacent land uses would not be exposed to airport noise that exceeds 60 CNEL. Impacts associated with airport noise would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**
4.11 Population and Housing			
Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Implementation of the Housing Element would include rezoning actions to support development of identified housing opportunity sites and accommodate the City's 2021–2029 Regional Housing Needs Allocation (RHNA) of 4,828 units. The identified housing sites provide capacity for up to 5,794 residential units, representing a theoretical maximum planning capacity of approximately 22,133 residents. The additional capacity beyond the RHNA allocation is intended to provide flexibility to account for market conditions, site constraints, and uncertainty regarding future development feasibility. The Housing Element would not expand the City's boundaries or Sphere of Influence, establish new growth areas, annex undeveloped lands, or require major infrastructure extensions into previously undeveloped areas. Instead, it would facilitate residential development within the existing urbanized area consistent with SCAG's regional growth	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	projections and adopted planning assumptions. Because the project accommodates anticipated housing needs within the City's existing urban framework and would not induce population growth beyond regional forecasts, impacts related to population growth and growth inducement would be less than significant.		
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Implementation of the Housing Element would facilitate future residential development and redevelopment through associated rezoning actions that increase allowable residential densities on identified housing sites. While redevelopment of certain sites containing existing residential uses could result in the removal of existing units or temporary displacement of residents, many identified sites are vacant or underutilized and would provide a net increase in overall housing capacity. Future redevelopment would be subject to applicable state and local requirements related to tenant protections, relocation assistance, replacement housing, and anti-displacement programs identified in the Housing Element. Although localized displacement could occur at individual sites, future development would increase the City's overall housing supply and capacity while incorporating measures to minimize displacement risks. Therefore, impacts related to displacement of existing housing or people would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
4.12 Public Services and Recreation			
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered fire emergency facilities in order to maintain service ratios, response times, or other performance objectives, and the construction of which could cause significant environmental impacts?	Implementation of the Housing Element would facilitate future residential development that could incrementally increase demand for fire protection and emergency response services. While additional development may require continued evaluation of staffing, equipment, or facilities over time, the Calexico Fire Department (CFD) currently maintains service standards based on operational needs rather than a fixed population ratio. Future development projects would be subject to review by the CFD and required to comply with applicable fire prevention regulations that address fire flow, hydrant spacing, emergency access, evacuation, and wildfire hazard considerations, ensuring that project-specific fire risks are appropriately evaluated and mitigated. Future development would also contribute to fire protection funding through applicable development impact fees, which support fire facilities, vehicles, and equipment. Although certain developments may be eligible for temporary fee waivers, the City would identify alternative funding sources as necessary to maintain public service levels. Any future construction or expansion of fire protection facilities would undergo separate project-level CEQA review. Impacts related to fire protection services and the need for new or expanded facilities would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project result in substantial adverse physical	Increased population from implementation of the Housing Element may incrementally require additional police personnel, equipment, or	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
impacts associated with the provision of new or physically altered police protection facilities in order to maintain service ratios, response times, or other performance objectives, 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?	facilities to maintain the City's existing service standard of approximately two officers per 1,000 residents. Future development projects would be reviewed by the City and applicable public safety agencies to ensure compliance with the General Plan, Municipal Code, Imperial County Multi-Jurisdictional Hazard Mitigation Plan, and other applicable requirements related to emergency access, circulation, and public safety. Development impact fees would also contribute to maintaining adequate police services and facilities. If future police facilities or expansions are determined necessary, such improvements would undergo separate project-level CEQA review. Because future development would occur incrementally and would be subject to applicable regulations, service planning, and funding mechanisms, impacts related to the need for new or expanded police protection facilities would be less than significant.		
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain service ratios, response times, or other performance objectives, 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?	Implementation of the Housing Element would facilitate future residential development that could incrementally increase student enrollment and demand for educational services within the Calexico Unified School District (CUSD). While CUSD currently has available capacity for some elementary grade levels, additional demand may occur for middle and high school grade levels as future residential development occurs. Increased enrollment would be evaluated by the City and CUSD to ensure adequate school capacity and service levels are maintained. Future development projects would be required to comply with applicable state requirements, including payment of school impact fees adopted by CUSD pursuant to SB 50. Coordination between the City, developers, and CUSD would occur as needed to address future educational service demands. If new or expanded school facilities are determined necessary, such improvements would undergo separate project-level CEQA review. Through compliance with applicable regulations, school impact fee requirements, and coordination with CUSD, impacts related to the need for new or expanded school facilities would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significan**t.
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities in order to maintain service ratios, response times, or other performance objectives, need for new or physically altered governmental facilities, the construction of which could cause significant	Implementation of the Housing Element would facilitate future residential development that could incrementally increase demand for library facilities, programs, and community services. While additional residents may increase demand for library services over time, future growth would occur within the context of the City's ongoing planning efforts and coordination with local and regional service providers to maintain adequate public services. Future development projects would be required to comply with applicable City regulations, development impact fee requirements, and General Plan policies related to public facilities and services. These	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significan**t.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?	requirements would support the continued maintenance and improvement of public facilities serving City residents, including library services. If future library expansions or new facilities are determined necessary, such improvements would undergo separate project-level CEQA review. Therefore, implementation of the Housing Element would result in less-than-significant impacts related to the need for new or expanded library facilities.		
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities in order to maintain service ratios, response times, or other performance objectives, 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? or 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? or Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Implementation of the Housing Element would facilitate future residential development that could incrementally increase demand for parks and recreational facilities. The City's Municipal Code Chapter 3.34 (Parkland Dedication Fees) establishes a parkland dedication standard of 0.0125 acre per residential unit, with applicable park requirements further guided by the General Plan. Future development projects would be required to comply with these standards and applicable development impact fee requirements established pursuant to the Quimby Act, which would support the City's ability to maintain and expand park facilities to serve future residents. The Housing Element does not directly authorize construction of new parks or recreational facilities; however, future development facilitated by the project would be reviewed for compliance with applicable parkland requirements and public facility standards. If new or expanded park facilities are determined necessary, such improvements would undergo separate project-level CEQA review. Therefore, impacts related to the need for new or expanded parks and recreational facilities would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
4.13 Transportation			
Would the project conflict with a program, plan, ordinance or policy addressing the circulation system,	The project would facilitate future residential growth that could incrementally increase demand for transportation improvements. The project does not include or approve specific roadway or infrastructure	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
including transit, roadway, bicycle and pedestrian facilities?	projects. Future development would be reviewed through the City's development process and would be required to comply with applicable regional and local transportation plans, including SCAG Connect SoCal, the Calexico General Plan, and ICTC transportation plans. The Local Transportation Analysis (LTA, Appendix I) identified future intersection improvements needed to maintain General Plan level of service standards, and that the project would not conflict with adopted transportation plans or preclude planned roadway, bicycle, pedestrian, or transit improvements.		
Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Consistent with SB 743, transportation impacts were evaluated using vehicle miles traveled (VMT). While many housing sites screened out as having less-than-significant impacts, a detailed VMT analysis determined that multiple housing sites would exceed the CEQA significance threshold of 15 percent below the Imperial County regional average VMT per capita. Because future development at these sites could generate VMT above the applicable threshold, implementation of the project would result in a potentially significant transportation impact related to VMT.	**MM-TRA-1: VMT Reduction Measures**. Future development of housing sites identified in the Housing Element shall incorporate feasible VMT-reducing project features during project design, as determined appropriate by the City during discretionary review. Consistent with the Transportation Study, VMT reduction measures may include, but are not limited to: • Development at residential densities that support reduced vehicle travel and increase opportunities for walking, bicycling, and transit use; • Construction of new sidewalks and pedestrian connections that improve access between residential neighborhoods, schools, parks, commercial centers, and transit stops; • Installation or expansion of bicycle facilities consistent with the City of Calexico Bicycle Master Plan Update, the ICTC Regional Active Transportation Plan, and applicable City standards; • Improvements that enhance connectivity to existing Imperial Valley Transit (IVT) routes and transit stops; • Additional transportation demand management (TDM) measures or VMT reduction strategies determined appropriate during project-level environmental review. Consistent with the Transportation Study, these project features are intended to reduce VMT through increased residential density, improved pedestrian connectivity, and expansion of the City's bicycle network. The estimated effectiveness of these measures was evaluated using methodologies contained in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021).	With implementation of **MM-TRA-1**, multiple housing sites received VMT reductions that meet the minimum VMT to mitigate the impacts to level below significance. However, remaining housing sites still do not meet the minimum VMT needed to mitigate the impacts to levels below significance. Those remaining housing sites have been mitigated to the greatest extent possible, and impacts associated with VMT would remain **significant and unavoidable impacts.**
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	The proposed project is a policy-level planning document that does not approve specific development projects or include roadway modifications. Although Appendix I identifies future operational improvements at select intersections, including signalization and turn-lane improvements, these improvements are intended to enhance traffic operations and safety and would not create hazardous roadway conditions. Future development would be subject to applicable City engineering standards, the Municipal Code, Caltrans requirements, and	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	project-specific review. Therefore, the project would not introduce transportation hazards or incompatible transportation uses.		
Would the project result in inadequate emergency access?	The proposed project is a policy-level planning document and does not include specific development projects, roadway modifications, or changes to emergency response routes. Future development facilitated by the project would occur within the existing urbanized area and would be required to maintain adequate emergency access through compliance with the California Fire Code, California Building Code, City engineering standards, and applicable review procedures. Temporary construction-related access impacts would be addressed through standard traffic control measures and required permits. Future project-level reviews would evaluate site access, circulation, and emergency vehicle access to ensure adequate response capabilities are maintained.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**
4.14 Utilities and Service Systems			
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	The proposed project is a planning-level action that establishes the policy and regulatory framework for future development but does not approve specific development projects. Future development facilitated by the proposed project may increase demand for water, wastewater, stormwater, solid waste, electrical, natural gas, and telecommunications facilities; however, such development would generally occur within urbanized areas served or planned to be served by existing public infrastructure and would be subject to the City's development review process to ensure adequate utility service and facility capacity. As such, the implementation of the proposed project would not require or result in the relocation or construction of new and expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The impact of the proposed project with respect to water, wastewater, stormwater infrastructure, electricity, natural gas, and telecommunications would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Implementation of the Housing Element and associated rezoning actions would establish land use policies and zoning regulations to accommodate future housing needs but would not directly approve or authorize development or increase water demand independently. The project's population and water demand is consistent with the population growth projections evaluated in the City's 2022 Urban Water Management Plan (UWMP), which identifies sufficient water supplies to serve anticipated demands during normal, single dry, and multiple dry years through 2045. Actual water demand would occur incrementally as future development proceeds and would be evaluated through subsequent project-level	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	review. Future development would be required to comply with applicable water supply regulations, including SB 610 and SB 221 requirements where applicable, as well as the City's General Plan, Municipal Code, UWMP, and statewide water conservation requirements. The City's development review process would ensure adequate water availability is evaluated prior to project approval, and future UWMP updates would incorporate revised growth projections and any additional supply planning needs. Therefore, implementation of the Housing Element would not result in insufficient water supplies during normal or dry-year conditions, and impacts related to water supply availability would be less than significant.		
Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Implementation of the Housing Element and associated rezoning actions would facilitate future residential and industrial development but would not directly authorize construction or generate wastewater flows independently. The City of Calexico owns and operates a wastewater collection and treatment system regulated by applicable state and regional agencies. The City's Wastewater Treatment Plant (WWTP) currently operates below its permitted capacity. Implementation of the Housing Element could generate an estimated wastewater demand that is within the City's existing and planned wastewater treatment capacity. Future development would occur incrementally and would be subject to subsequent project-level review, connection requirements, and applicable wastewater regulations. The City's Urban Water Management Plan identifies future WWTP expansion and rehabilitation needs to accommodate anticipated cumulative growth, and the City's Capital Improvement Program includes funding for wastewater facility improvements. Future projects would also be required to comply with applicable wastewater standards, including CALGreen plumbing efficiency requirements, state wastewater discharge requirements, and City development standards. Therefore, implementation of the Housing Element would not result in inadequate wastewater treatment capacity, and impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the project not comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Implementation of the Housing Element would facilitate future residential and industrial development that could generate construction and operational solid waste. The City of Calexico relies on regional solid waste facilities, including the Calexico Solid Waste Site and Imperial Landfill, which have a combined remaining capacity of approximately 13.9 million cubic yards. Future development would generate typical construction debris, including concrete, lumber, packaging materials, and other materials; however, construction activities would be required to comply with CALGreen requirements, which mandate diversion of at least 65 percent of construction and demolition waste from landfills, as well as applicable City Municipal Code requirements for construction and demolition waste recycling and diversion.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	Operational waste generation associated with future development would also be subject to applicable federal, state, and local solid waste reduction and recycling requirements. Hazardous wastes generated during construction or operation would be managed in accordance with applicable regulations. Implementation of the Housing Element would not generate substantial solid waste or conflict with applicable solid waste regulations. Impacts would be less than significant.		
4.15 Wildfire			
Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Implementation of the Housing Element would facilitate future residential development and associated rezoning within existing urbanized areas of Calexico, which could incrementally increase demand for fire protection, emergency medical services, and emergency response infrastructure. However, the project does not approve specific development projects or include physical improvements that would alter existing roadway circulation, emergency access, or evacuation routes. Although several housing sites are located near the City's wildland-urban interface (WUI), these sites are within the existing urban footprint and are surrounded by established roadways, development, and public infrastructure. Future development would not extend into remote wildland areas or create isolated neighborhoods with limited emergency access. Future development would be subject to City review and permitting requirements, including review by the Calexico Fire Department, and would be required to comply with applicable fire and emergency access standards. Because future development would occur within areas already served by existing infrastructure and would be required to demonstrate compliance with applicable emergency access standards, implementation of the Housing Element would not impair emergency response or evacuation capabilities. Impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.
Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Several housing sites (Sites 37 through 41 and 50 through 52) overlap with Moderate High Fire Hazard Severity Zones and designated wildland-urban interface (WUI) areas, the City does not contain High or Very High Fire Hazard Severity Zones. Future development would be subject to applicable federal, state, and local fire protection requirements, including the California Fire Code, General Plan Safety Element, and Imperial County Multi-Jurisdictional Hazard Mitigation Plan policies related to emergency preparedness, evacuation, fire protection, and hazard reduction. New development would be required to incorporate fire-resilient design features, including defensible space, fire-resistant materials, adequate fire flow, hydrant access, emergency vehicle circulation, and applicable fire suppression measures. Through compliance with these requirements and review by	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant**.

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	the City Building Official and Fire Marshal, future development would not substantially increase wildfire intensity, rates of spread, or exposure of residents to wildfire-related hazards or smoke. Therefore, impacts related to wildfire risks and pollutant concentrations from wildfires would be less than significant.		
Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or result in temporary or ongoing environmental impacts?	Implementation of the Housing Element would facilitate future residential development that could require extensions, upgrades, or connections to existing infrastructure systems, including roadways, utilities, telecommunications, and fire protection facilities. However, the project does not approve specific infrastructure improvements or promote development in remote, undeveloped areas where new infrastructure could increase wildfire ignition or spread risks. The identified housing sites are located within Calexico's existing urbanized area and are generally served by established utility and transportation networks. Although several sites overlap with the City's mapped WUI area, existing infrastructure is already present, and future development would not introduce new utility corridors or electrical infrastructure into undeveloped wildfire-prone areas. Future infrastructure improvements would be subject to applicable engineering standards, utility requirements, building codes, and fire protection regulations designed to minimize wildfire risks. The City Fire Chief may also require additional measures, such as enhanced building, landscaping, or site design standards, where appropriate. Therefore, implementation of the Housing Element would not increase wildfire risks associated with the installation, maintenance, or operation of infrastructure, and impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**
Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	The City of Calexico is characterized by relatively flat terrain and highly urbanized land uses, without steep hillside environments susceptible to post-fire slope instability or landslides. In addition, the project would not introduce development into heavily vegetated WUI areas where wildfire-related erosion or debris flow hazards would be substantial. Although localized flooding conditions may occur during storm events, compliance with the CBC, grading ordinances, and the National Pollutant Discharge Elimination System (NPDES) requirements would further ensure that development incorporates engineering and design practices that avoid significant increases in erosion or geologic hazards. Implementation of the project would not substantially increase risks associated with post-fire runoff, debris flows, or landslides. Therefore, impacts would be less than significant.	Impacts would be less than significant. No mitigation is required.	Impacts would be **less than significant.**

1 Introduction

The City of Calexico (City), as lead agency pursuant to the California Environmental Quality Act (CEQA), has prepared this Draft Program Environmental Impact Report (DEIR) (State Clearinghouse House (SCH) No. 2026030920) for the City's 6th Cycle 2021–2029 Housing Element Update (Housing Element), associated General Plan Amendments and Zoning Ordinance Amendments ("proposed project" or "project") as defined in Chapter 3, Project Description. The Zoning Ordinance Amendments cover rezonings determined to be necessary as a result of the Housing Element, and the additional Bowker site rezoning proposed by the City. A detailed description of the project, including the 53 candidate Housing Element sites (housing sites), the required discretionary approvals, is provided in Chapter 3, Project Description, of this DEIR. This chapter outlines the purpose and overall approach to the preparation of the DEIR.

1.1 Purpose and Legal Authority

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15121, the purpose of this DEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant environmental effects of the project, possible ways to reduce its significant effects, and reasonable alternatives that would reduce or avoid identified significant effects.

Per California Government Code Section 65580, the Housing Element has two main purposes:

(1) To provide an assessment of both current and future housing needs and constraints in meeting these needs; and

(2) To provide a strategy that establishes housing goals, policies, and programs.

This DEIR has been prepared as a Program EIR by the City, in compliance with the criteria, standards, and procedures of CEQA as amended (Public Resources Code, Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15168 (Program EIR).

1.1.1 Lead Agency

The City is the lead agency for the project, pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or

approving a proposed project. As lead agency, the City of Calexico Planning and Building Department determined that a DEIR was the appropriate CEQA documentation mechanism. The analysis and findings in this DEIR reflect the independent, impartial conclusions of the City.

1.1.2 Responsible and Trustee Agencies

In accordance with CEQA, this DEIR is prepared for review and use by Responsible and Trustee State agencies. Responsible Agencies are defined in CEQA Guidelines Section 15381 as those agencies that have discretionary authority over one or more actions involved with project implementation.

Responsible agencies for the proposed project may include:

- California Air Resources Board (CARB)
- Imperial County Air Pollution Control District (ICAPCD)
- California Department of Housing and Community Development (HCD)
- Colorado River Basin Regional Water Quality Control Board (RWQCB) Region 7
- California Department of Transportation (Caltrans) District 11
- California Department of Pesticide Regulation (DPR)
- California Department of Toxic Substances Control (DTSC)
- California Governor's Office of Emergency Services (OES)
- California Native American Heritage Commission (NAHC)
- California Public Utilities Commission (CPUC)
- Office of Historic Preservation

The ICAPCD is an agency that regulates sources of air pollution within the County and would be responsible for issuing permits for construction of future projects associated with the Housing Element. As a responsible agency, the HCD reviews the City's Housing Element for conformance with State law. The RWQCB regulates water quality through monitoring of compliance with the regional water quality permit (or "general permit") in accordance with the Clean Water Act Section 401 certification process. The RWQCB would have the responsibility of approving the Notice of Intent to comply with the terms of the general permit to discharge stormwater associated with future construction activity allowed by the proposed project. The RWQCB would also be responsible for compliance with the National Pollutant Discharge Elimination System compliance review process. Lastly, Caltrans is an agency that is responsible for the State highway system, including freeway entrance and exit ramps.

Trustee Agencies are defined by CEQA Guidelines Section 15386 as State agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the

people of the State of California (State). Trustee Agencies may include but are not limited to the California Department of Water Resources (DWR) and California Department of Fish and Wildlife, Inland Deserts Region 6 (CDFW) due to the potential onsite biological resources and water resources, managed and enforced by these agencies.

1.2 DEIR Type, Scope, Organization, and Content

1.2.1 Type of DEIR

This DEIR has been prepared as a Program DEIR, as defined in Section 15168 of the CEQA Guidelines. A Program DEIR is recommended for a series of actions that are related geographically, as logical parts in a chain of contemplated actions, or in connection with the issuance of plans that govern the conduct of a continuing program [per CEQA Guidelines, Section 15168(a)]. The advantages of a Program EIR include the ability to provide a more exhaustive consideration of alternatives and cumulative effects than might be possible in a single project-specific EIR; to avoid duplication of basic policy considerations; and to provide the lead agency with the ability to consider broad program-wide policies and mitigation measures that would apply to specific projects within the overall program [CEQA Guidelines, Section 15168 (b)].

As a programmatic document, this DEIR does not evaluate project-specific impacts of potential future developments that may be proposed by either the City or other entities consistent with the vision of the project, all of which would be required to prepare a more precise, project-level analysis to fulfill CEQA and/or National Environmental Policy Act (NEPA), as applicable. The City is responsible for reviewing these individual discretionary projects shall determine the level of review needed, and the scope of that analysis will depend on the specifics of the particular project. Pursuant to CEQA Guidelines Section 15152 (Tiering), these projects may, however, use the discussion of impacts in this DEIR as a basis for their assessment of these regional, citywide, or cumulative impacts, provided that the projects are consistent with the Housing Element and the data and assumptions used in this DEIR remain current and valid.

1.2.2 DEIR Scope

The scope of analysis for this DEIR was determined by the City as a result of initial project review, consideration of agency and public comments received in response to the Notice of Preparation (NOP) circulated March 20, 2026, and a scoping meeting held on Thursday, April 9, 2026. April 21, 2026, marked the end of the NOP scoping period. The NOP and letters received in response are included in Appendix A of this DEIR.

Through these scoping activities, the project was determined to have the potential to result in the following significant environmental impacts:

- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Growth Inducement
- Cumulative Effects

These issues are evaluated in Chapter 4, Environmental Impact Analysis, of this DEIR. Pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), impacts are identified as direct or indirect, short-term or long-term, and assessed on a "plan-to-ground" basis. The "plan-to-ground" analysis addresses the changes or impacts that would result from implementation of the proposed project compared to existing ground conditions. An analysis of the impacts of the project compared to existing adopted plans, is presented within Chapter 5, Project Alternatives, under the No Project Alternative.

The technical analyses supporting this DEIR use buildout projections that may vary among resource areas based on the purpose and methodology applicable to each analysis. For transportation, air quality, greenhouse gas (GHG) emissions, and noise, the technical studies use an intentionally conservative buildout scenario based on the absolute maximum potential unit yield under the proposed project. This approach evaluates environmental effects assuming the greatest potential development intensity and is intended to avoid understating potential impacts. Other technical analyses may appropriately use different assumptions where those assumptions more accurately reflect the purpose and

methodology of the analysis. For example, the Water Supply Assessment (WSA, Appendix J) uses a population projection based on the assumed unit yield, rather than the absolute maximum theoretical unit yield, to estimate anticipated water demand and to account, to a limited extent, for factors such as market conditions and project absorption.

The use of different buildout projections among the technical studies does not represent an inconsistency in the proposed project description or a change in the proposed project's development potential. Rather, each analysis applies assumptions appropriate to its particular analytical purpose. These differing assumptions are therefore methodological distinctions intended to provide a comprehensive and appropriately conservative evaluation of the proposed project's potential environmental effects.

1.2.3 Issues Not Studied in Detail in the DEIR

Impacts of the proposed project that were determined to be less than significant by the City of Calexico during the scoping process, pursuant to Section 15128 of the California Environmental Quality Act (CEQA) Guidelines, are outlined below:

- Aesthetics
- Energy
- Mineral Resources

According to the State CEQA Guidelines, "An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." A brief summary of proposed project effects found not to be significant, including reasons why they would not be significant can be found in Chapter 6, Other CEQA Considerations, Section 6.5 Effects Found Not to be Significant.

1.2.4 DEIR Organization and Content

The DEIR has been organized in accordance with the most recent CEQA Guidelines. A brief summary of the organization and content of this DEIR is provided below:

- **Executive Summary** includes a brief project description, summarizes the DEIR analysis, and provides a table outlining significant impacts, proposed mitigation measures, and resulting impact levels after mitigation. It also summarizes the project alternatives and compares the potential impacts of the alternatives to those of the proposed project.
- **Chapter 1, Introduction** provides an overview of the legal authority, purpose, intended uses, scope, and organization of the DEIR. It also discusses the CEQA environmental review process, including opportunities for public participation.

- **Chapter 2, Environmental Setting** describes the project's regional and local setting, including its location and context, existing physical characteristics and land uses, available public infrastructure and services, and relationship to other applicable plans.
- **Chapter 3, Project Description** provides a detailed description of the project, including background information on its development, primary objectives, and key features, as well as the discretionary actions required for implementation.
- **Chapter 4, Environmental Impact Analysis** evaluates the potential impacts associated with the environmental issues addressed in the DEIR scope. Each issue area includes a discussion of existing conditions and the applicable regulatory framework, identifies the thresholds and methodology used to determine significance, assesses potential impacts, and evaluates the significance of those impacts in consideration of the existing regulatory framework and/or new standards proposed as part of the Housing Element. Where potentially significant impacts are identified, the analysis outlines the applicable regulatory framework and proposed mitigation measures, and concludes whether the framework would adequately address the impacts and the resulting level of significance.
- **Chapter 5, Alternatives** provides a description and comparative analysis of alternatives to the project, including the No Project Alternative, the Reduced Sites Alternative. Chapter 5 also includes a summary and comparison of the alternatives. In accordance with CEQA Guidelines Section 15126.6(e)(2), the DEIR identifies the environmentally superior alternative.
- **Chapter 6, Other CEQA Considerations** discusses the significant unavoidable and irreversible impacts associated with project implementation, including potentially significant irreversible environmental changes. The chapter also evaluates the proposed project's potential to directly or indirectly induce economic or population growth within the project area and region, and identifies cumulative impacts associated with other planned and future regional development. In addition, it identifies issue areas determined to be less than significant during the scoping and preliminary environmental review process and briefly summarizes the basis for those determinations under CEQA criteria.
- **Chapter 7, List of Preparers** lists all Federal, State, or local agencies, organizations, and private individuals consulted in preparing the DEIR, and the persons, firm, or agency who prepared the EIR by contract or other authorization.
- **Chapter 8, References** includes all the reference materials cited in the DEIR.

Technical appendices, used as a basis for much of the environmental analysis in the DEIR, have been summarized in the DEIR, and are printed under separate cover as part of the DEIR.

The technical appendices are available for review at the City of Calexico Development Services Department at 608 Heber Avenue, Calexico, California 92231.

As permitted by CEQA Guidelines Section 15150, this DEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this DEIR, and the relationship to this DEIR described. These documents are included in Chapter 8, References, and are hereby incorporated by reference.

1.3 DEIR Intended Use and Environmental Review Process

1.3.1 Intended Uses of this DEIR

This document is intended to be used by the City in evaluating the project and related amendments. In addition, as a DEIR, this document is intended to be used by the City when taking action on subsequent applications for development within the project areas to ensure compliance with applicable regulations and mitigation framework included in this DEIR.

1.3.2 Environmental Review Process

The DEIR process includes a scoping process where notice of the project is circulated to the public and issues to be addressed in the environmental analysis are identified. The scoping period for this DEIR was from March 20, 2026, to April 21, 2026. The scoping meeting took place in the City Library on April 9, 2026. Following the scoping period, the DEIR is prepared and circulated for comment to agencies and the public. After the comment period closes, the Final EIR is prepared to provide responses to comments received and any necessary revisions or clarifications. Together, the Draft and Final EIR constitute the informational basis for the City's consideration of project approval and related discretionary actions.

1.3.2.1 Draft EIR

In accordance with Sections 15085 and 15087(a)(1) of the CEQA Guidelines and the City's CEQA Supplemental Regulations, upon completion of the DEIR a Notice of Completion is filed with the State Office of Land Use and Climate Innovation (LCI) and Notice of Availability of the DEIR is issued in a newspaper of general circulation in the area.

The DEIR is distributed for review to the public and interested and affected agencies for the purpose of providing comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (Section 15204, CEQA Guidelines).

The DEIR and all related technical studies are available for review during the public review period at the offices of the City of Calexico Development Services Department at 608 Heber

Avenue, Calexico, California 92231. Copies of the DEIR are also available at the following public location:

City of Calexico Camarena Memorial Library

850 Encinas Avenue

Calexico, CA 92231

The DEIR can be downloaded from the City's website at:

https://www.calexico.ca.gov/index.asp?SEC=75E0B2A9-8C2E-438C-AE0A-E87942C3F18B

1.3.2.2 Final Program EIR

Following public review of the DEIR, the City will provide written responses to comments per CEQA Guidelines Section 15088 and will consider all comments in making its decision whether to certify the Final EIR. Responses to the comments received during public review, associated revisions to the DEIR sections, a Mitigation Monitoring and Reporting Program, Findings of Fact, and a Statement of Overriding Considerations (if applicable for any impacts identified in the DEIR as significant and unmitigated) will be prepared and compiled as part of the Final EIR. The EIR identified significant and unavoidable impacts to Agricultural Resources, Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Transportation; therefore, a Findings of Fact and a Statement of Overriding Considerations have been prepared.

The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA. The Final EIR will be available for public review at least 14 days before the decision-making bodies make a recommendation or final determination, in order to provide commenters the opportunity to review the written responses to the EIR comment letters.

1.3.3 Subsequent Environmental Review

As allowed in CEQA Guidelines Section 15168, Program EIR, future development proposals within the project areas will be reviewed by the City in compliance with and based on the Final Housing Element EIR. The EIR and subsequent project review process, defined in Section 15168 of the CEQA Guidelines, allow an EIR to serve as the basis for environmental review of subsequent projects. Sections 15182 and 15183 of the CEQA Guidelines provide additional review guidance for projects proposed in accordance with an adopted specific plan, or consistent with an adopted community plan, general plan, or zoning.

If any future projects within the project areas have potentially significant adverse environmental effects that were not examined in this EIR, an Initial Study shall be prepared for that project, leading to the preparation of a Negative Declaration, Mitigated Negative Declaration, Focused EIR, or Supplement to this EIR. When additional environmental documentation for a new project is necessary, this EIR may be incorporated by reference to address regional context, secondary effects, cumulative impacts, alternatives, and other factors that apply to the program as a whole.

2 Environmental Setting

This chapter describes the existing environmental conditions, or baseline conditions, within the City of Calexico (City). The environmental setting provides the framework for assessing potential changes resulting from implementation of the proposed project. This DEIR describes the environmental setting for each resource area within the corresponding environmental issue section in Chapter 4, Environmental Impact Analysis. Unless otherwise noted, the environmental setting information presented in this chapter reflects conditions existing at the time the Notice of Preparation (NOP) was published on March 20, 2026.

2.1 Regional Setting

The City is located within the County of Imperial, about 200 miles southeast of Los Angeles, 120 miles east of San Diego, and 60 miles west of Yuma. The City in its entirety is approximately 5,516.8 acres or 8.62 square miles, and functions as an important binational gateway between Southern California and Baja California, Mexico. As shown in Figure 2-1: Regional Location, the City is bounded by unincorporated Imperial County to the north, with the community of Heber located approximately two miles away. To the west, the All-American Canal separates Calexico from surrounding agricultural lands and the Mt. Signal Solar Farm. The City's eastern boundary adjoins unincorporated Imperial County, while its southern boundary is defined by the U.S.–Mexico international border.

The Imperial Valley (Valley) region is a predominantly desert region characterized by flat topography, arid climatic conditions, and extensive agricultural development supported by regional irrigation infrastructure. Development within the Imperial Valley is characterized by a combination of concentrated urban communities surrounded by extensive agricultural land uses and open desert areas. Urban development is generally organized around incorporated cities and unincorporated communities connected by major state highways and regional transportation corridors. Agricultural operations dominate much of the valley floor and are supported by an extensive irrigation network associated with the Imperial Irrigation District (IID). Industrial and commercial development tends to cluster near transportation corridors, border crossings, and established population centers, while lower-density residential neighborhoods predominate within many of the Valley's incorporated communities.

2.1.1 Border Influence

The City shares a direct international boundary with the City of Mexicali, Baja California, forming an interconnected binational urban area with strong economic, social, and cultural ties. The Calexico West and Calexico East Ports of Entry facilitate the movement of goods

and people between the United States and the City of Mexicali. Land use, transportation, infrastructure, and economic activity within Calexico are closely influenced by cross-border travel and trade patterns associated with Mexicali and the international ports of entry. As a result, regional growth, circulation patterns, and infrastructure demands within Calexico are influenced by both local and cross-border conditions.

2.2 Project Location

The project location is comprised of 53 Housing Element sites included in the Housing Element Sites Inventory, collectively referred to as the "housing sites". There is one additional rezone site assessed within this project, the Bowker site that shall be rezoned for industrial, as discussed in greater detail in Chapter 3, Project Description. The housing sites are distributed throughout the City and are primarily located in areas with existing or planned infrastructure and public services, including proximity to major transportation corridors, as well as established residential neighborhoods. As shown in Figure 2-2: Project Location, regional access to the City is provided via State Route (SR) 111, SR 98, and Cole Blvd.

While the Housing Element programs and actions may apply citywide through amendments to the General Plan and Municipal Code, the physical development potential analyzed in this DEIR is concentrated on the identified housing sites, which are proposed for rezoning and/or increased residential capacity to facilitate Housing Element implementation.

Single-family residential development comprises much of the City's developed area, while commercial uses are concentrated along major transportation corridors, including SR 111 and SR 98. Industrial and logistics-related development is generally located in the southern portion of the City near the international border and the Calexico–Mexicali Ports of Entry. Development patterns within Calexico are also influenced by cross-border activity, transportation infrastructure, and the availability of vacant and underutilized infill parcels suitable for future residential and mixed-use development.

2.2.1 Climate

The City experiences an arid desert climate characterized by hot summers, mild winters, low annual precipitation, and high rates of evaporation. Located within the Imperial Valley in southeastern California, the City is subject to prolonged periods of high temperatures during the summer months, with daytime temperatures frequently exceeding 100 degrees Fahrenheit. Average annual precipitation is limited and occurs primarily during winter storm events, although occasional summer monsoonal activity may occur. Climatic conditions in the region contribute to dry soils, sparse native vegetation, and periodic windblown dust and air quality concerns common to desert environments.

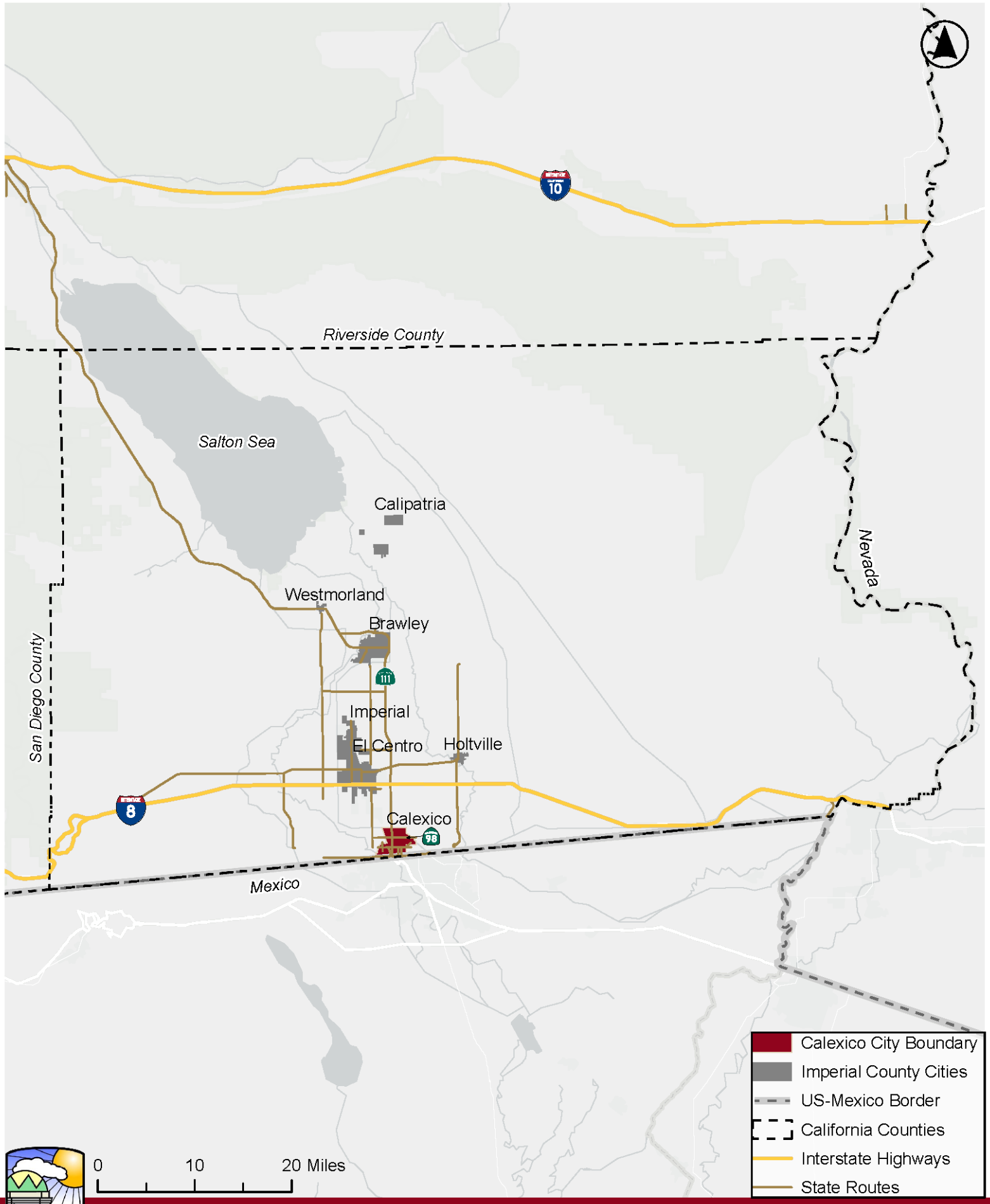


Figure 2-1:
Regional Location

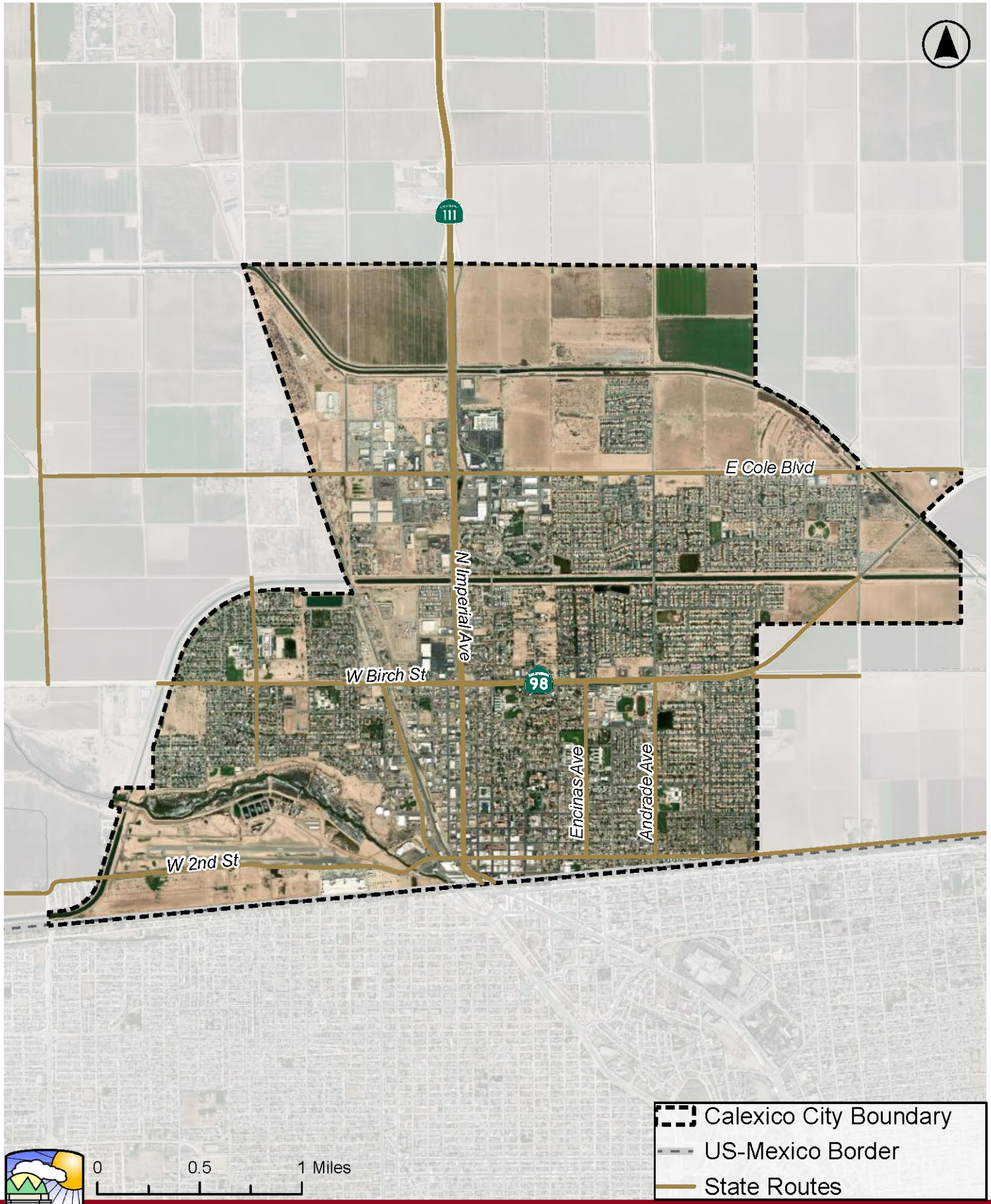


Figure 2-2:
Project Location

2.3 Existing Land Uses

The City is predominantly urbanized and has approximately 38,623 residents as of the July 1, 2025 U.S. Census Bureau estimates (U.S. Census Bureau 2025). A variety of land uses, including residential, commercial, office, and industrial land uses exist within the City, as shown in Figure 2-3: Existing Land Use. The City is predominantly developed with low to medium density residential (City of Calexico 2007). Commercial development is largely concentrated near the U.S.–Mexico international border and the Calexico–Mexicali Port of Entry and along SR 111 and SR 98, which function as the City's primary commercial corridors. Industrial uses are generally located along the western side of the City along the rail line. As the City is primarily developed, infrastructure, including roads, water, sewer, energy, and communication facilities, is available. There are numerous vacant and underutilized sites throughout the City available for development.

The General Plan Land Use Map reflects these development patterns with a majority of Low Density Residential (LDR) uses throughout the City, with Medium Density Residential (MDR) buffering the LDR from the Commercial Core-Mixed Use (CC) designations along the major transportation corridors. Pockets of High Density Residential (HDR) are found along the major transportation corridors near the commercial centers. The outer parts of the City are designated for residential specific plan (RSP), intended for large-scale subdivisions, extending from existing infrastructure.

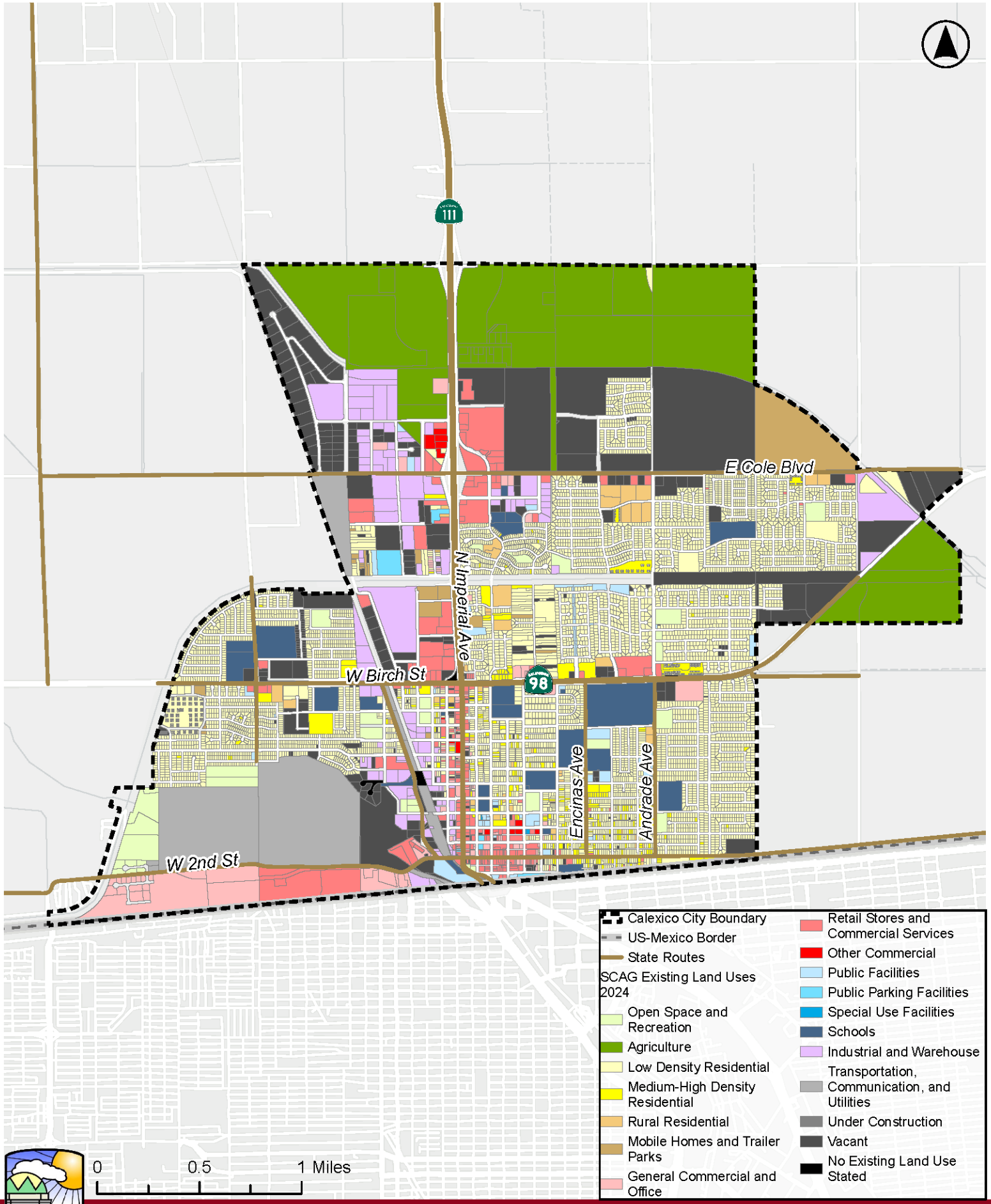


Figure 2-3:
Existing Land Use

2.4 Existing Zoning

The City of Calexico is primarily zoned for a range of residential, commercial, office, and industrial uses distributed throughout the City, as shown in Figure 2-4: Existing Zoning. The industrial zones are generally on the west side of the City along the rail line adjacent to Cesar Chavez Blvd. Commercial zones are along SR 111, scattered along SR 98, and along Cole Blvd west of SR 111. Residential uses, predominantly Residential Single Family occupy the remaining developed areas of the City.

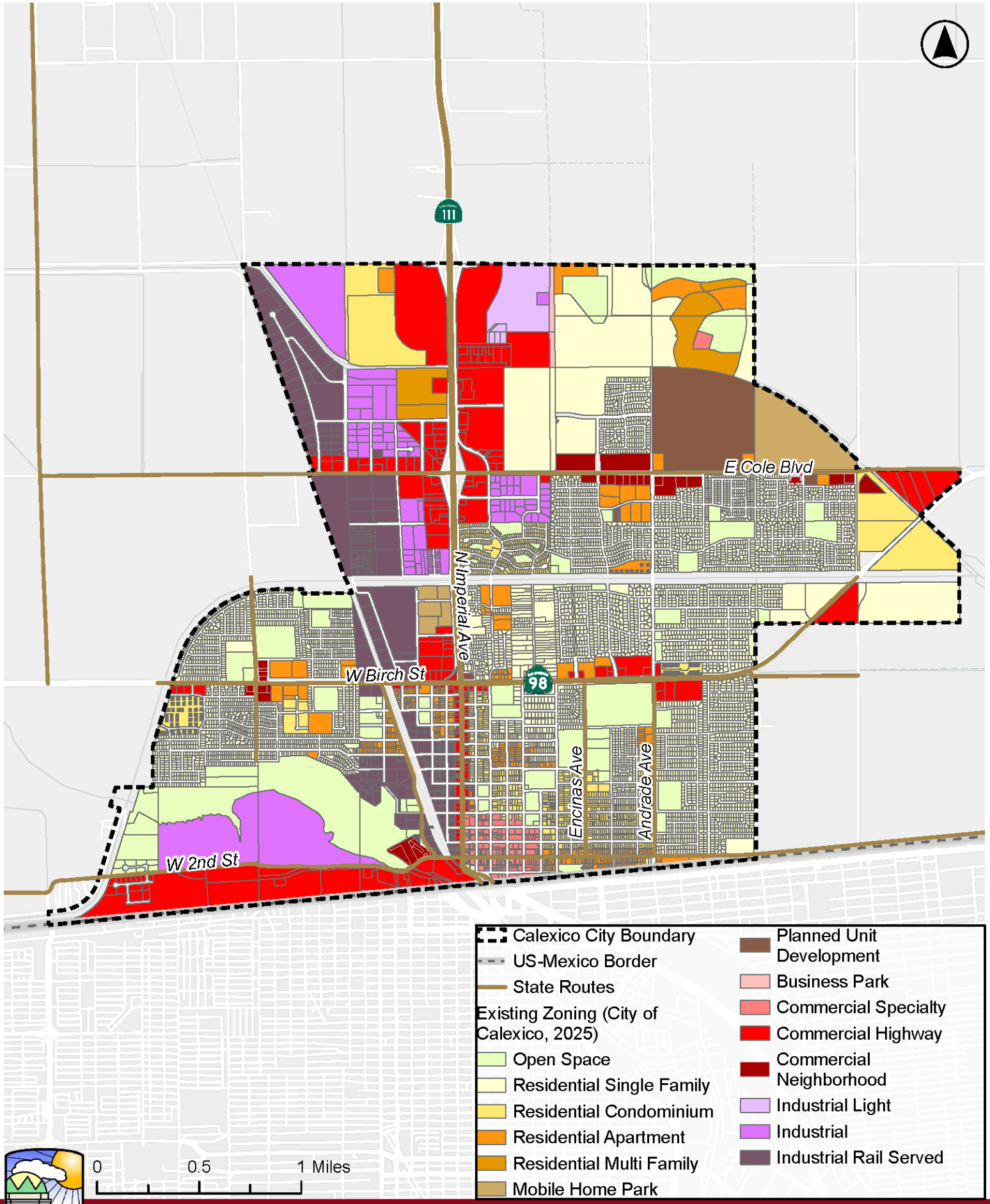


Figure 2-4:
Existing Zoning

3 Project Description

This chapter introduces the objectives of the project and summarizes specific information describing the project. This includes a description of the project characteristics, including the City's housing sites inventory, rezone sites, and associated discretionary actions. These aspects of the project provide the basis for the environmental analysis provided in Chapter 4, Environmental Impact Analysis. This project description is intended to provide the level of detail necessary to evaluate potential environmental effects of Housing Element implementation at a programmatic level.

3.1 Project Background

The Housing Element is one of the State of California (State)-mandated elements of the General Plan, and it identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low income households and for special-needs populations. State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). Calexico's Housing Element was last adopted in January 2014 for the 5th Cycle of the 2014-2021 planning period. In accordance with State law, the City has prepared the 6th Cycle 2021-2029 Housing Element (Housing Element) to address the housing needs of all types of households and income levels for current and future Calexico residents.

3.2 Regional Housing Needs Allocation

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Allocation (RHNA) for each Council of Governments (COG) in the State that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region, in which Calexico is a member agency. The Housing Element includes goals, policies, and implementation programs identified to help the City meet its 6th Cycle RHNA.

For the 2021-2029 planning period, the City is allocated a total of 4,868 units, including 1,279 units affordable to very low-income households & below, 655 affordable to low-income, 614 units affordable to moderate-income, and 2,320 units affordable to above moderate (market-rate) income households. See Table 3-1, Calexico Regional Housing Needs Allocation.

Table 3-1: Calexico Regional Housing Needs Allocation

Income Category	Percent of Median Family Income (MFI)	Calexico's RHNA Allocation for the 2021 – 2029 Planning Period
Extremely Low Income*	0-30% MFI	639
Very Low Income	31-50% MFI	640
Low Income	51-80% MFI	655
Moderate Income	81-120% MFI	614
Above Moderate Income	>120% MFI	2,320
Total		**4,868**
Note: The RHNA is not provided for the Extremely Low income group by HCD. Therefore, the Very Low income group is divided equally between the Extremely Low and Very Low income group. However, since the Very Low income group is an odd number, one unit is added to Very Low income group, and one unit is subtracted from Extremely Low income group to determine the Extremely Low income group amounts		

3.3 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15124, the following primary objectives support the purpose of the project; assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this report, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. Specifically, the project objectives are as follows:

1. Facilitate the City's ability to accommodate the City's RHNA allocation for the 2021–2029 planning period.
2. Support a range of housing types and densities that can accommodate households across all income levels, including very low-, low-, moderate-, and above-moderate-income categories, consistent with State housing law requirements.
3. Ensure internal consistency between the Housing Element, General Plan, and Zoning Code by identifying and evaluating necessary amendments that enable the anticipated housing capacity and development patterns.
4. Promote land use patterns and housing programs that support affirmatively furthering fair housing (AFFH), including increased access to housing opportunities and resources for all segments of the community, including persons with special needs.

5. Facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services, such that development can occur without causing or exacerbating environmental effects where feasible.

3.4 Project Description

Consistent with CEQA Guidelines Section 15168, this Draft EIR provides a programmatic analysis of the environmental impacts associated with implementation of the proposed project components: 1) the City of Calexico 6th Cycle 2021–2029 Housing Element (Housing Element); 2) associated General Plan Amendments, including the corresponding consistency updates to the City of Calexico Land Use Element[1]; 3) Zoning Ordinance Amendments to implement by-right housing per the Housing Element; and 4) rezoning the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I) as later discussed in this section. These project components make up the term "proposed project," or "project" used throughout this DEIR.

As required by State law, the Housing Element includes the following components:

1. A Community Profile documenting local demographic, economic, and housing characteristics to guide housing policies for eight-year cycles;
2. Housing Constraints, Resources, and Affirmatively Further Fair Housing to identify development constraints and address disproportionate housing needs;
3. A Housing Plan including the Sites Inventory demonstrating adequate capacity to accommodate the RHNA allocation;
4. Rezoning commercial and industrial properties to allow residential or mixed-use development;
5. Upzoning of select residential properties to increase allowable densities;
6. Implementation programs facilitating housing production and removing regulatory constraints; and
7. Policies to affirmatively further fair housing and promote equitable housing opportunities.
8. Appendices including: Review of Past Performance, Adequate Housing Sites, Community Engagement Summary, and Glossary of Terms

[1] California Senate Bill (SB) 1000 (Government Code Section 65302(h)) requires cities and counties containing one or more disadvantaged communities to adopt an Environmental Justice Element, or integrate environmental justice goals, policies, and objectives into other General Plan elements, upon the adoption or next revision of two or more General Plan elements concurrently on or after January 1, 2018. The proposed project includes adoption of the Housing Element and amendments to the Land Use Element. Accordingly, the City of Calexico has initiated preparation of environmental justice policies and programs for incorporation into its General Plan to comply with the requirements of SB 1000.

The 6th Cycle Housing Element's Sites Inventory identifies suitable sites throughout the City that could result in a total of 5,794 units to accommodate the required housing capacity set forth by the City's RHNA. The pipeline projects and Accessory Dwelling Unit (ADU) unit projections included in the Housing Element are not included in the sites inventory assumed in this project description. The Housing Element identifies 53 sites throughout the City with the capacity to accommodate the RHNA, as shown in Figure 3-1: Housing Sites. These 53 sites in the inventory will have changes made to zoning or applied General Plan land use designation as a result of the proposed project, shown in detail in Figure 3-1a through 3-1e. There are 35 rezone sites, with four of those considered upzones, as shown in Figure 3-2: Rezone and Upzone Sites. The housing sites are categorized into By-Right Development Sites, and Discretionary Development Sites. These terms are defined in Section 3.4.1, Eligible By-Right Development Sites, and Section 3.4.2, Discretionary Development Sites, below.

The proposed zone of each housing site is shown in Figure 3-3: Proposed Zoning. The analysis assumes full implementation of the Housing Element rezoning program and associated residential development by 2050.

As defined in Section 3.5, Associated Discretionary Actions, the Housing Element includes programs that will amend the General Plan, Zoning Ordinance, and/or the Municipal Code, to comply with State law or incentivize housing development.

Bowker Rezone Site

Housing site 24b is a Discretionary Development Site proposed to rezone from Residential Condominium (RC) to Industrial (I) (APN 059-180-029). The site is bounded to the northwest by State Route 98 (SR-98), the All-American Canal (AAC) to the south, and the AAC Central Drain Three E to the northeast. While the site was previously zoned for housing, upon further evaluation, the City has determined this site is a poor location for residential and better suited for industrial for the following reasons: the site is physically isolated by the SR-98 and the AAC, thus disconnecting the site from public services, including parks and schools; the site's boundaries would create emergency access and vehicle miles traveled (VMT) concerns. Furthermore, the City plans to foster industrial development east of the site to leverage the international commercial port of entry with Mexico located approximately six miles due east of the site, and to limit truck traffic through residential areas of the City by limiting new industrial development on the west side of the City. As such, the site is better suited for industrial or commercial development. Because the Housing Element identifies a surplus of housing sites to meet the City's RHNA, this rezone is considered appropriate, given the geographical context of the site. Additionally, the loss of residential zoning incurred

as a result of this rezone would not be cause for concern given Senate Bill (SB) 330[2] due to the surplus of additional housing sites identified in the Housing Element update. This site is referred to in this document as the Bowker site.

3.4.1 Eligible By-Right Development Sites

By-Right Development Sites refer to sites that are subject to ministerial processing and not subject to discretionary review by the City and no review is required under the California Environmental Quality Act (CEQA) per Cal. Gov. Code, § 65583.2(i). Ministerial processing involves little or no personal judgment by the City as to the wisdom or manner of carrying out the project. The City merely ensures that the proposed development meets all objective standards without using special discretion or judgment. By-Right Development Sites do not require a public hearing.

As shown in Table 3-2: Sites Inventory, the 49 Eligible By-Right Development Sites include sites: 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, and 53. The Housing Element establishes the following criteria as pathways for By-Right Development Sites:

1. **4th or 5th Cycle Housing Element sites:** Sites identified in the City's 6th Cycle Housing Element that were also included in the City's 4th or 5th Cycle Housing Element sites inventory to accommodate a portion of the RHNA. This criteria goes above and beyond what is legally required for by-right processing of prior cycle housing sites.
2. **Qualified residential sites:** Sites zoned for Residential Condominium (RC) or Residential Apartment (RA), less than ten (10) gross net buildable acres, with existing adequate access to infrastructure, public right-of-way, and public services.

Additionally, per Housing Element Program 2E, the City will permit residential uses by-right for housing development in which at least 20-percent of the units are affordable to lower-income households for sites that:

- Are non-vacant and identified in the prior planning period; and
- Vacant sites included in two or more consecutive planning periods.

3.4.2 Discretionary Development Sites

Discretionary Development Sites refer to sites that are subject to discretionary processing where the City has the discretion to approve, modify or deny a project based on personal

[2] California Senate Bill 330 (SB 330), also known as the Housing Crisis Act of 2019, is a state law designed to speed up new home construction, protect existing affordable housing, and limit local bureaucratic barriers.

judgment. Projects subject to discretionary processing may be subject to CEQA and the discretionary review process for multifamily projects and subdivisions may require a public hearing.

As shown in Table 3-2: Sites Inventory, the 5 Discretionary Development Sites include sites: 1, 2, 3, 24, and 24b. The Housing Element establishes Discretionary Development Sites as greater than ten (10) net buildable acres, for which zoning amendments are proposed to allow residential or mixed-use development at densities sufficient to meet RHNA requirements. These sites may currently be designated for commercial, mixed-use, or other non-residential uses, or have limited or no access to infrastructure and right-of-way.

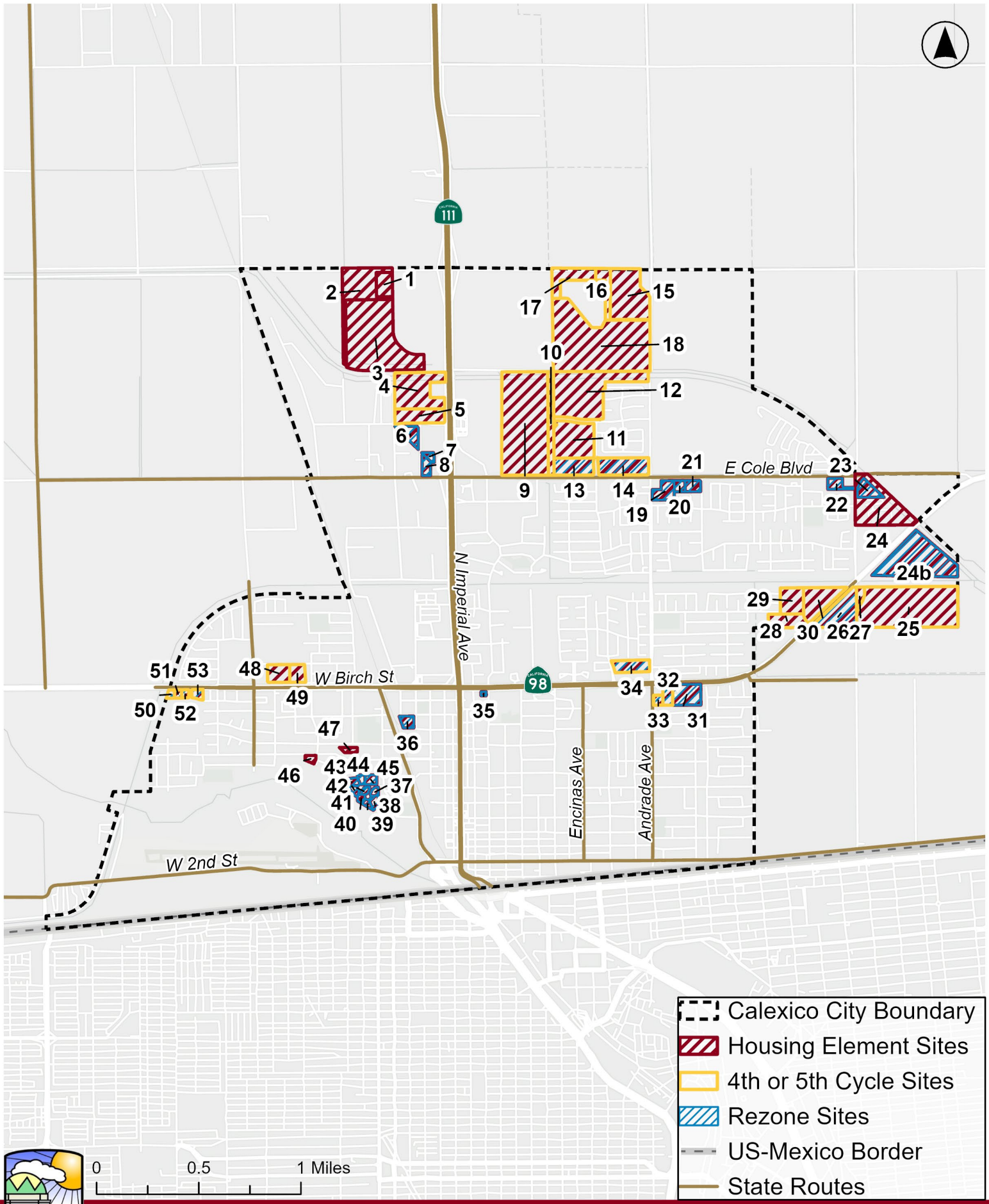


Figure 3-1:
Housing Element Sites

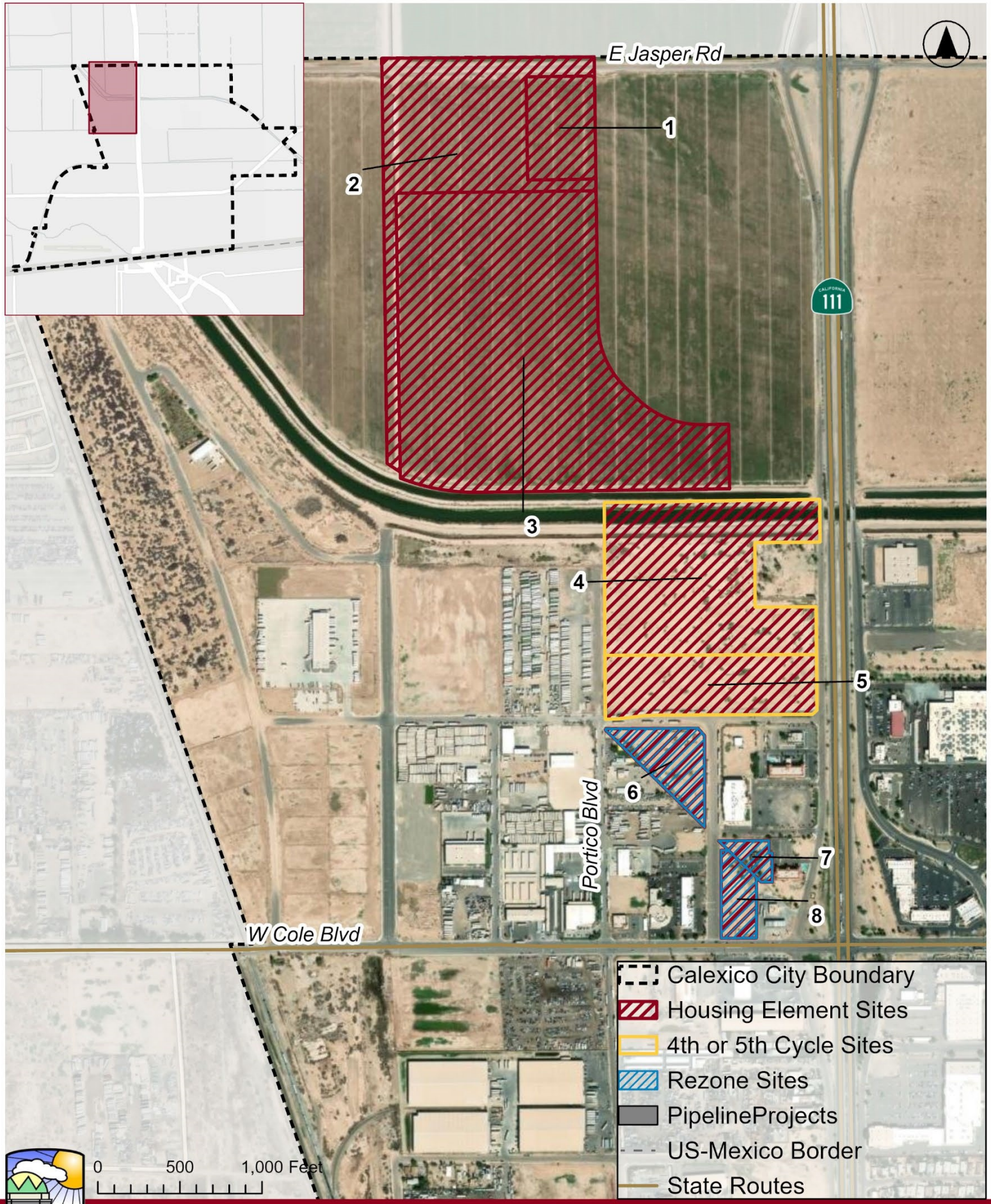


Figure 3-1a:
Housing Sites 1-8

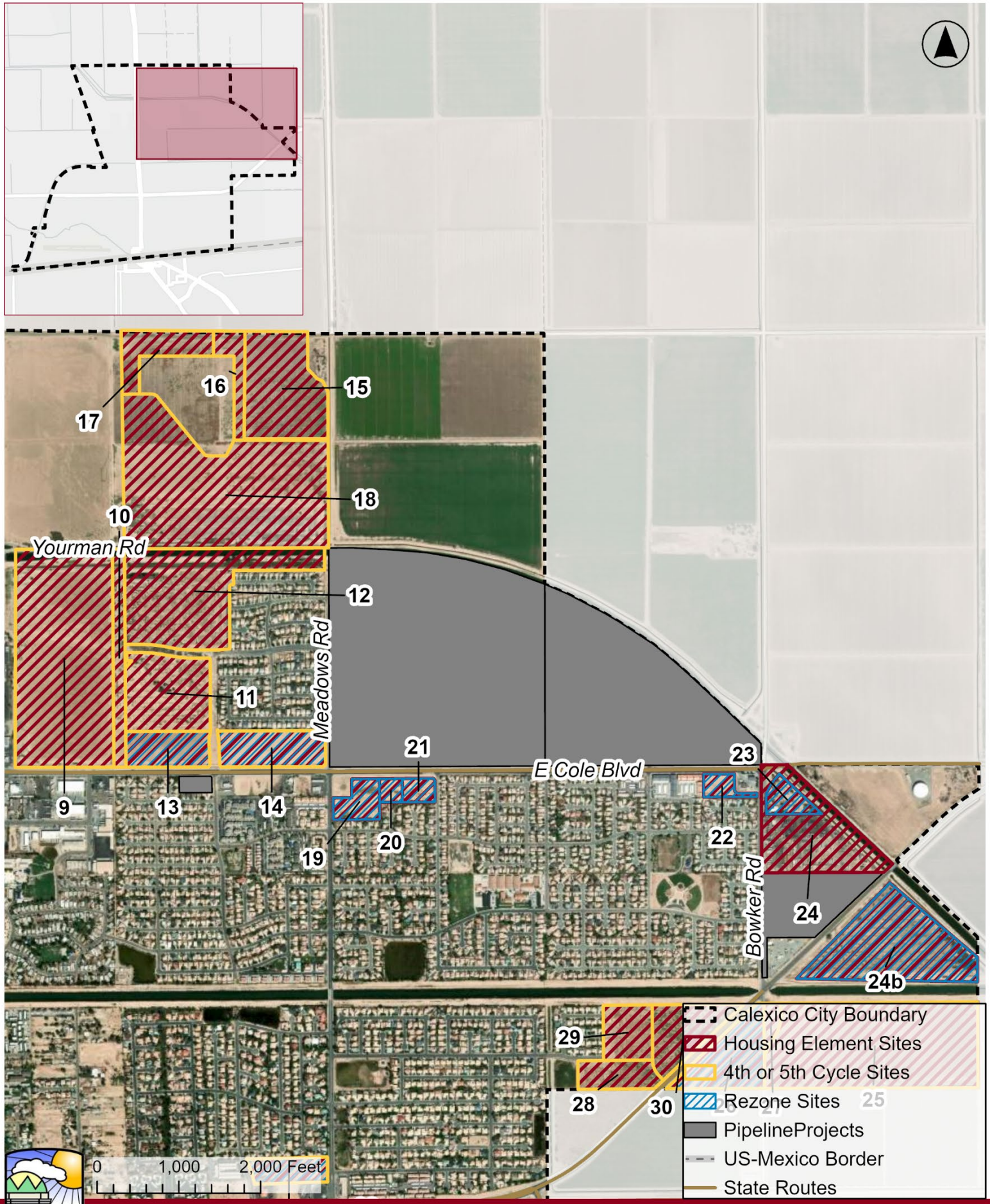


Figure 3-1b:
Housing Sites 9-24b

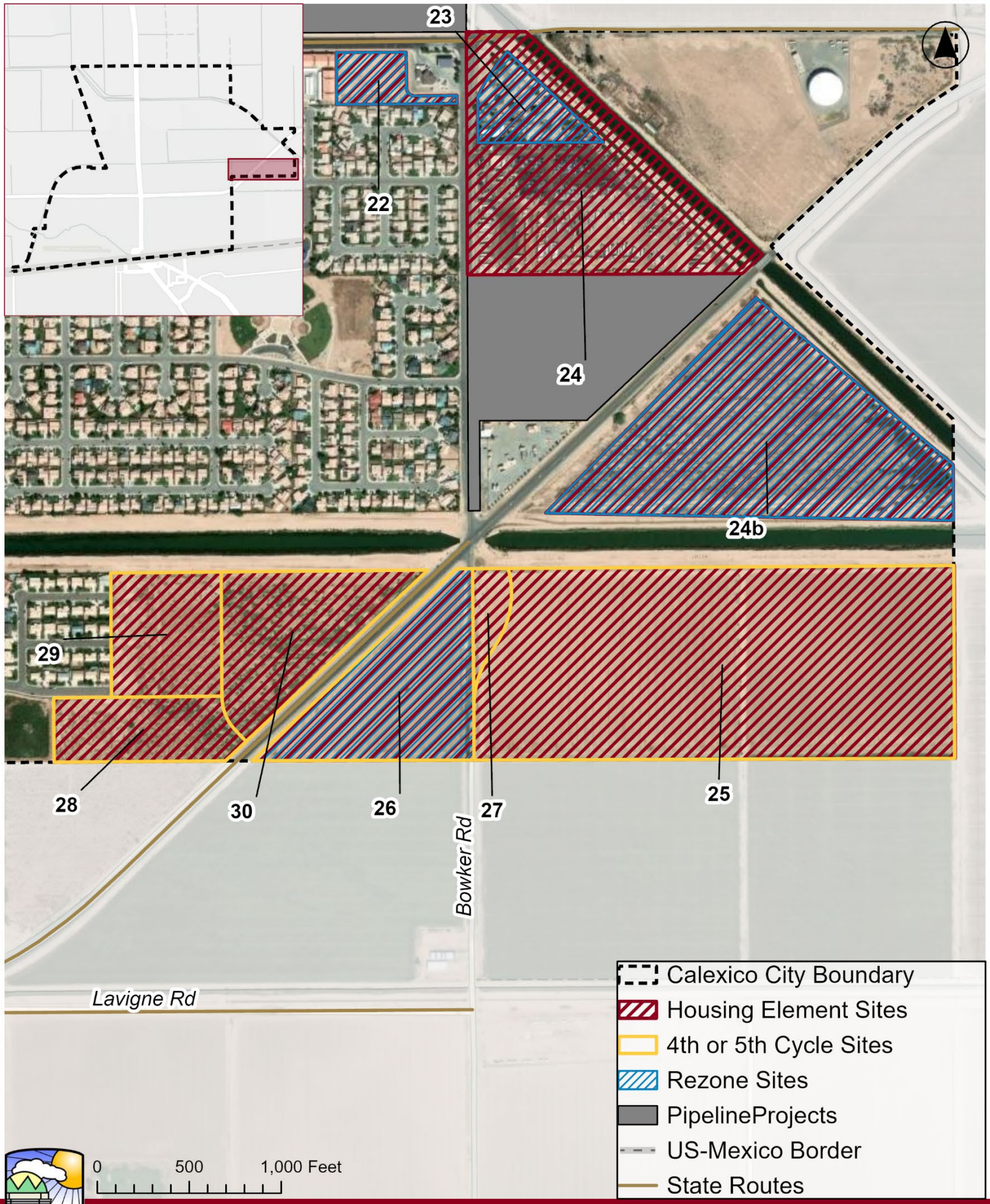


Figure 3-1c:
Housing Sites 25-30

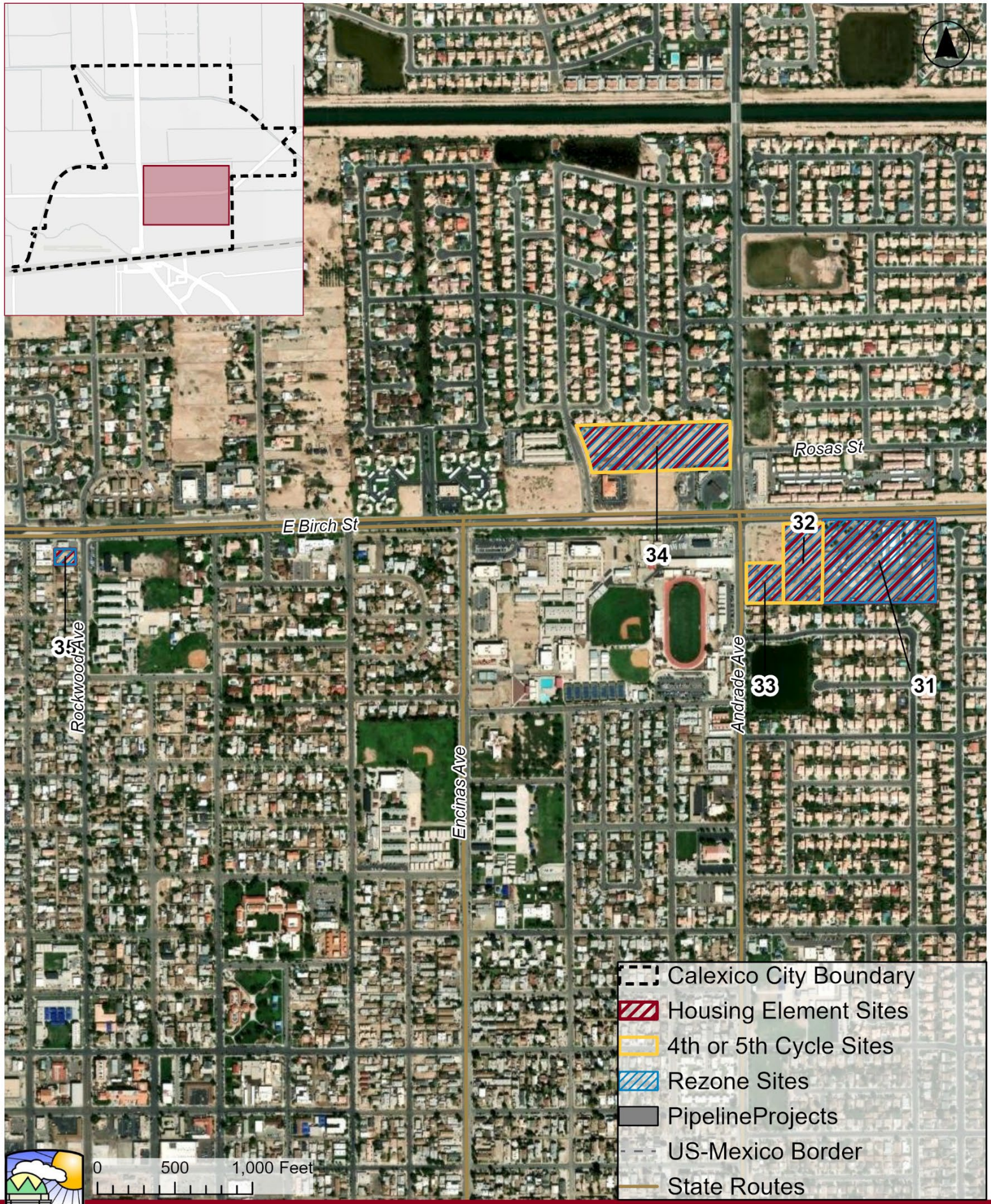


Figure 3-1d:
Housing Sites 31-35

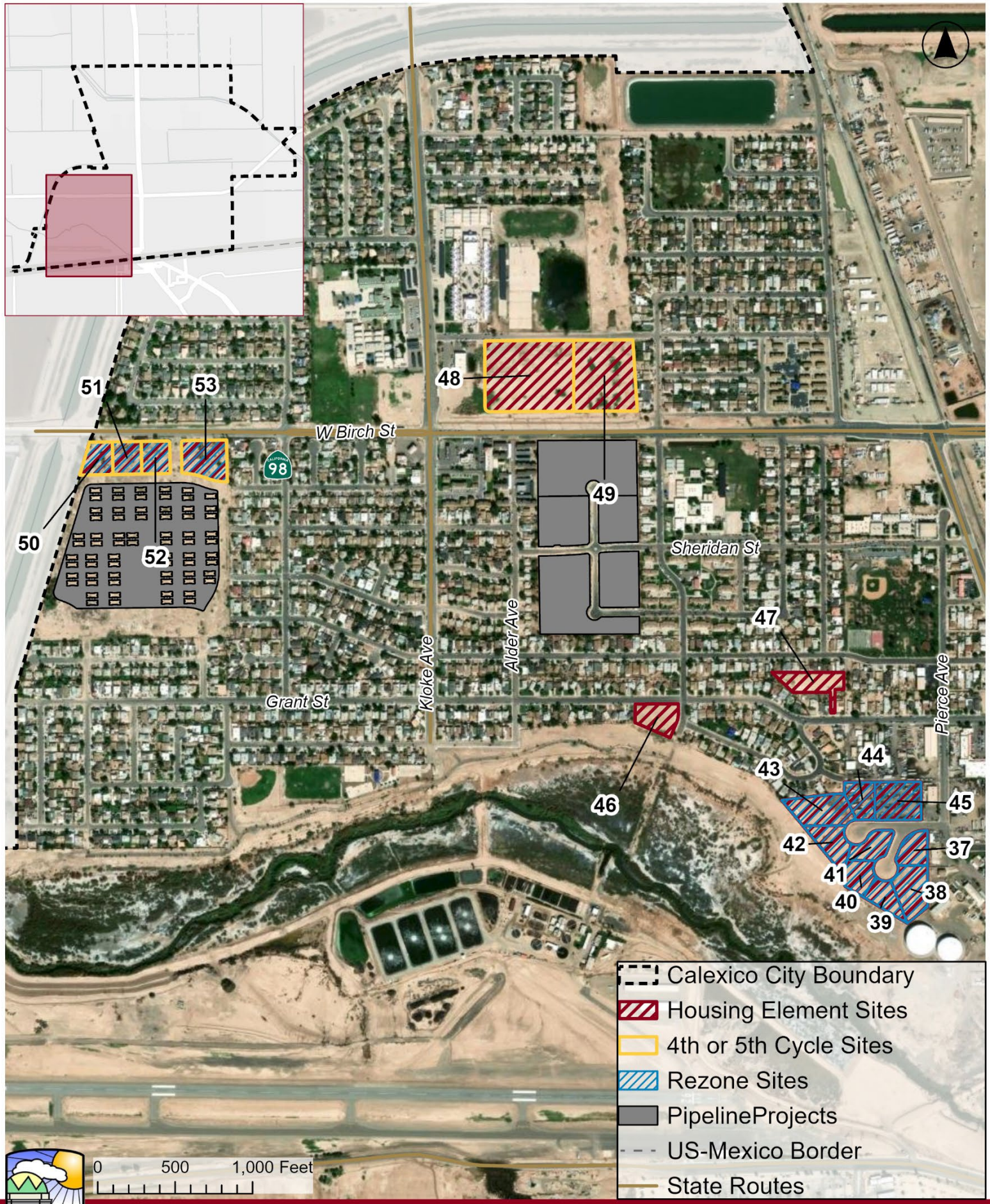


Figure 3-1e:
Housing Sites 36-53

Table 3-2: Sites Inventory

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
1	059010066	Jasper Rd.	RA	High Density Residential	No	RA	High Density Residential	No	No	No	0	6.00	5.40	No	Yes	30	24	N/A	N/A	Existing Residential Parcel	180	130	130	0	0	Agricultural row crops. Existing residential zoning to be maintained.
2	059010065	Jasper Rd.	RC	Medium Density Residential	No	RC	Medium Density Residential	No	No	No	0	21.36	19.22	No	N/A	20	16	N/A	N/A	Existing Residential Parcel	427	308	0	0	308	Agricultural row crops. Existing residential zoning to be maintained.
3	059010064	Jasper Rd.	RC	Medium Density Residential	No	RC	Medium Density Residential	No	No	No	0	60.00	54.00	No	N/A	20	16	N/A	N/A	Existing Residential Parcel	1200	864	0	0	864	Agricultural row crops. Existing residential zoning to be maintained.
4	059010019	Scaroni Rd.	R2	Commercial Highway	No	R2	Medium Density Residential**	Yes	No	Yes	0	22.36	20.12	Yes	N/A	12	10	N/A	N/A	Existing Residential Parcel	268	201	0	0	201	Vacant site. Existing medium density residential zoning.
5	059010020	Robinson Blvd.	R2	Commercial Highway	Yes	RC*	Medium Density Residential**	Yes	No	Yes	0	13.03	11.73	Yes	N/A	12	10	20	16	Residential Upzone Parcel	261	188	0	188	0	Vacant upzone site.
6	059010048	Robinson Blvd.	CH	Commercial Highway	Yes	RA*	High Density Residential**	Yes	No	No	0	4.25	3.83	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	128	92	92	0	0	Vacant rezone site.
7	059342030	615 Scaroni Rd.	CH	Commercial Highway	Yes	RA*	High Density Residential**	No	No	No	0	1.16	1.04	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	35	25	25	0	0	Site of old burned down home to be demolished soon. Main access is through Van de Graaf Ave.
8	059342033	2402 Van De Graaf Ave.	CH	Commercial Highway	Yes	RA*	High Density Residential	Yes	No	No	0	2.32	2.09	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	70	50	50	0	0	Vacant rezone site.

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
9	059010032	Cole Blvd.	R1	Medium Density Residential	No	R1	Low Density Residential**	Yes	Yes	No	0	63.53	57.18	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	318	229	0	0	229	Vacant site. Existing low density residential zoning.
10	059010030	Cole Blvd.	R1	Medium Density Residential	No	R1	Low Density Residential**	Yes	Yes	No	0	9.18	8.26	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	46	33	0	0	33	Vacant site. Existing low density residential zoning.
11	059491003	Spud Moreno St.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	Yes	0	21.94	19.75	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	110	79	0	0	79	Vacant site. Existing low density residential zoning. Within CFD.
12	059500003	Spud Moreno St.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	No	Yes	0	43.03	38.73	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	215	155	0	0	155	Vacant site. Existing low density residential zoning. Within CFD.
13	059491004	Cole Blvd.	CN	Commercial Neighborhood	Yes	RA*	High Density Residential**	Yes	Yes	No	0	10.30	9.27	Yes	No	N/A	N/A	30	24	Rezone Parcel	309	222	222	0	0	Vacant rezone site. Within CFD.
14	059496059	Cole Blvd.	CN	Commercial Neighborhood	Yes	RC*	Medium Density Residential**	Yes	Yes	No	0	13.19	11.87	Yes	N/A	N/A	N/A	20	16	Rezone Parcel	264	190	0	190	0	Vacant rezone site. Within CFD.
15	059010057	Jasper Rd.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	Yes	0	27.56	24.80	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	138	99	0	0	99	Vacant site. Existing low density residential zoning.
16	059010058A	Jasper Rd.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	Yes	0	14.26	12.83	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	71	51	0	0	51	Vacant site. Existing low density residential zoning.

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
17	059010058 B	Jasper Rd.	RA	High Density Residential	No	RA	High Density Residential	Yes	Yes	Yes	0	10.40	9.36	Yes	N/A	30	24	N/A	N/A	Existing Residential Parcel	312	225	0	0	225	Vacant site. Existing high density residential zoning.
18	059010059	Jasper Rd.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	Yes	0	76.05	68.45	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	380	274	0	0	274	Vacant site. Existing low density residential zoning.
19	059471040	Cole Blvd.	CN	Commercial Neighborhood	Yes	RA*	High Density Residential**	Yes	No	No	0	5.78	5.20	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	173	125	125	0	0	Vacant rezone site.
20	059471041	Cole Blvd.	CN	Commercial Neighborhood	Yes	RA*	High Density Residential**	Yes	No	No	0	2.10	1.89	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	63	45	45	0	0	Vacant rezone site.
21	059471042	Cole Blvd.	CN	Commercial Neighborhood	Yes	RA*	High Density Residential**	Yes	No	No	0	3.01	2.71	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	90	65	65	0	0	Vacant rezone site
22	059455042	Cole Blvd.	CN	Commercial Neighborhood	Yes	RA*	High Density Residential	Yes	No	No	0	2.80	2.52	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	84	60	60	0	0	Vacant rezone site
23	059180034	570 Bowker Rd.	NC	Commercial Neighborhood	Yes	RA*	High Density Residential**	No	No	No	1	4.42	3.98	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	133	95	95	0	0	Underdeveloped property with one single family home surrounded by on-site vacant land.
24	059180035	Bowker Rd.	RC	Medium Density Residential	No	RC	Medium Density Residential	No	No	No	0	24.24	21.82	No	N/A	20	16	N/A	N/A	Existing Residential Parcel	485	349	0	349	0	Underdeveloped property with no major permanent structures and intermittent storage uses that is zoned for medium residential density development.

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
24 b	059180029	Bowker Rd.	RC	Medium Density Residential	Yes	IR	Industrial	Yes	No	No	N/A	37.00	33.30	No	N/A	N/A	20	N/A	N/A	Rezone Parcel	N/A	N/A	0	0	0	Better suited for industrial or commercial use, not residential.
25	059180045	Highway 98	R1	Medium Density Residential	No	R1	Low Density Residential**	No	Yes	Yes	0	60.96	54.86	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	305	219	0	0	219	Agricultural row crops. Existing residential zoning to be maintained.
26	059180044 A	Highway 98	CH	Commercial Neighborhood	Yes	R2*	Low-Medium Density Residential**	No	Yes	No	0	15.50	13.95	Yes	N/A	N/A	N/A	12	10	Rezone Parcel	186	140	0	0	140	Agricultural row crops. Rezone site.
27	059180044 B	Highway 98	R1	Medium Density Residential	Yes	RA*	High Density Residential**	No	Yes	No	0	2.12	1.91	Yes	Yes	5	4	30	24	Residential Upzone Parcel	64	46	46	0	0	Agricultural row crops. Upzone site.
28	059441003	Sapphire St.	R1	Low Density Residential	Yes	RA*	High Density Residential**	Yes	Yes	No	0	7.79	7.01	Yes	Yes	5	4	30	24	Residential Upzone Parcel	234	168	168	0	0	Vacant upzone site.
29	059441004	Sapphire St.	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	No	0	9.33	8.40	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	47	34	0	0	34	Vacant site. Existing low density residential zoning.
30	059441005	Highway 98	R1	Low Density Residential	No	R1	Low Density Residential	Yes	Yes	No	0	12.89	11.60	Yes	N/A	5	4	N/A	N/A	Existing Residential Parcel	64	46	0	0	46	Vacant site. Existing low density residential zoning.
31	059240040	Highway 98	CH	Public Facilities	Yes	RC*	Medium Density Residential**	No	No	No	0	8.97	8.07	Yes	Yes	N/A	N/A	20	16	Rezone Parcel	179	129	0	129	0	Abandoned Border Patrol station. Current owner has indicated interest in developing multifamily residential on site.
32	059240048	Highway 98	CH	Commercial Office	Yes	RA*	High Density Residential**	Yes	Yes	No	0	2.94	2.65	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	88	64	64	0	0	Vacant rezone site.

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
33	059240050	Highway 98	CH	Commercial Office	Yes	RA*	High Density Residential**	Yes	Yes	No	0	1.50	1.35	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	45	32	32	0	0	Vacant rezone site.
34	058791005	1071 E Birch Ave	CH	Commercial Highway	Yes	RA*	High Density Residential**	Yes	Yes	No	0	6.60	5.94	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	198	143	143	0	0	Vacant rezone site.
35	058264002	1037 Rockwood Ave	CH	Commercial Highway	Yes	RC*	Medium Density Residential**	Yes	No	No	0	0.31	0.28	Yes	N/A	N/A	N/A	20	16	Rezone Parcel	6	4	0	4	0	Vacant rezone site.
36	058294001	915 Ollie Ave.	IR	Industrial	Yes	RA*	High Density Residential**	No	No	No	0	2.23	2.01	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	67	48	48	0	0	Underutilized site next to Heber Park. Site is mostly vacant with two dilapidated buildings and intermittent trucking uses. Rezone site.
37	058400058	Pierce Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	0.85	0.77	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	26	18	18	0	0	Vacant rezone site.
38	058400057	Pierce Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	1.46	1.31	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	44	32	32	0	0	Vacant rezone site.
39	05840056	Pierce Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	0.84	0.76	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	25	18	18	0	0	Vacant rezone site.
40	05840055	Pierce Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	0.84	0.76	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	25	18	18	0	0	Vacant rezone site.
41	05840054	Sherman Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	0.89	0.80	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	27	19	19	0	0	Vacant rezone site.
42	05840053	Sherman Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	1.09	0.98	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	33	24	24	0	0	Vacant rezone site.
43	058400052	Sherman Ct.	IR	Industrial	Yes	RA*	High Density Residential**	Yes	No	No	0	1.68	1.51	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	50	36	36	0	0	Vacant rezone site.

ID	APN	Address/Cross Street	Existing Zoning	Existing General Plan Land Use	Rezone	Proposed Zoning*	Proposed Land Use**	Vacant	4th Cycle Site	5th Cycle Site	Existing Units	Gross Acreage	Net Buildable Acreage	By Right	HCD Sizing Criteria	Existing Zone Density (MAX)	Existing Zone Density (Assumed)	Rezoned Density (MAX)	Rezoned Density (Assumed)	Inventory Category	Potential Unit Yield	Assumed Net Yield	Low/Very Low	Moderate	Above Moderate	Justification and Notes
44	058400051	Sherman Ct.	IR	Industrial	Yes	RA*	High Density Residential**	No	No	No	0	0.95	0.86	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	29	21	21	0	0	Underutilized site with intermittent storage uses. No permanent buildings. Rezone site.
45	05840065	Sherman Ct.	IR	Industrial	Yes	RA*	High Density Residential**	No	No	No	0	1.62	1.46	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	49	35	35	0	0	Underutilized site with intermittent storage uses. No permanent buildings. Rezone site.
46	058223020	Grant St.	RA	Low Density Residential	No	RA	High Density Residential**	Yes	No	No	0	1.06	0.95	Yes	Yes	30	24	N/A	N/A	Existing Residential Parcel	32	23	23	0	0	Vacant site. Existing high density residential zoning.
47	058233027	Lincoln St.	R1	Low Density Residential	Yes	R2*	Low-Medium Density Residential**	Yes	No	No	0	1.24	1.12	Yes	Yes	5	4	12	10	Residential Upzone Parcel	15	11	0	11	0	Vacant upzone site.
48	058853001	De Las Flores St.	RA	High Density Residential	No	RA	High Density Residential	Yes	Yes	Yes	0	6.03	5.43	Yes	Yes	30	24	N/A	N/A	Existing Residential Parcel	181	130	130	0	0	Vacant site. Existing high density residential zoning.
49	058853002	De Las Flores St.	RA	High Density Residential	No	RA	High Density Residential	Yes	Yes	Yes	0	4.16	3.74	Yes	Yes	30	24	N/A	N/A	Existing Residential Parcel	125	90	90	0	0	Vacant site. Existing high density residential zoning.
50	058180090	Highway 98	CH	High Density Residential	Yes	RA*	High Density Residential	Yes	Yes	Yes	0	0.88	0.79	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	26	19	19	0	0	Vacant rezone site.
51	058180091	Highway 98	CH	High Density Residential	Yes	RA*	High Density Residential	Yes	Yes	Yes	0	0.90	0.81	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	27	19	19	0	0	Vacant rezone site.
52	58180092	Highway 98	CH	High Density Residential	Yes	RA*	High Density Residential	Yes	Yes	Yes	0	0.89	0.80	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	27	19	19	0	0	Vacant rezone site.
53	58180093	Highway 98	CH	High Density Residential	Yes	RA*	High Density Residential	Yes	Yes	Yes	0	1.61	1.45	Yes	Yes	N/A	N/A	30	24	Rezone Parcel	48	35	35	0	0	Vacant rezone site.

*Indicates a rezone is required
**Indicates a Land Use Element redesignation is required

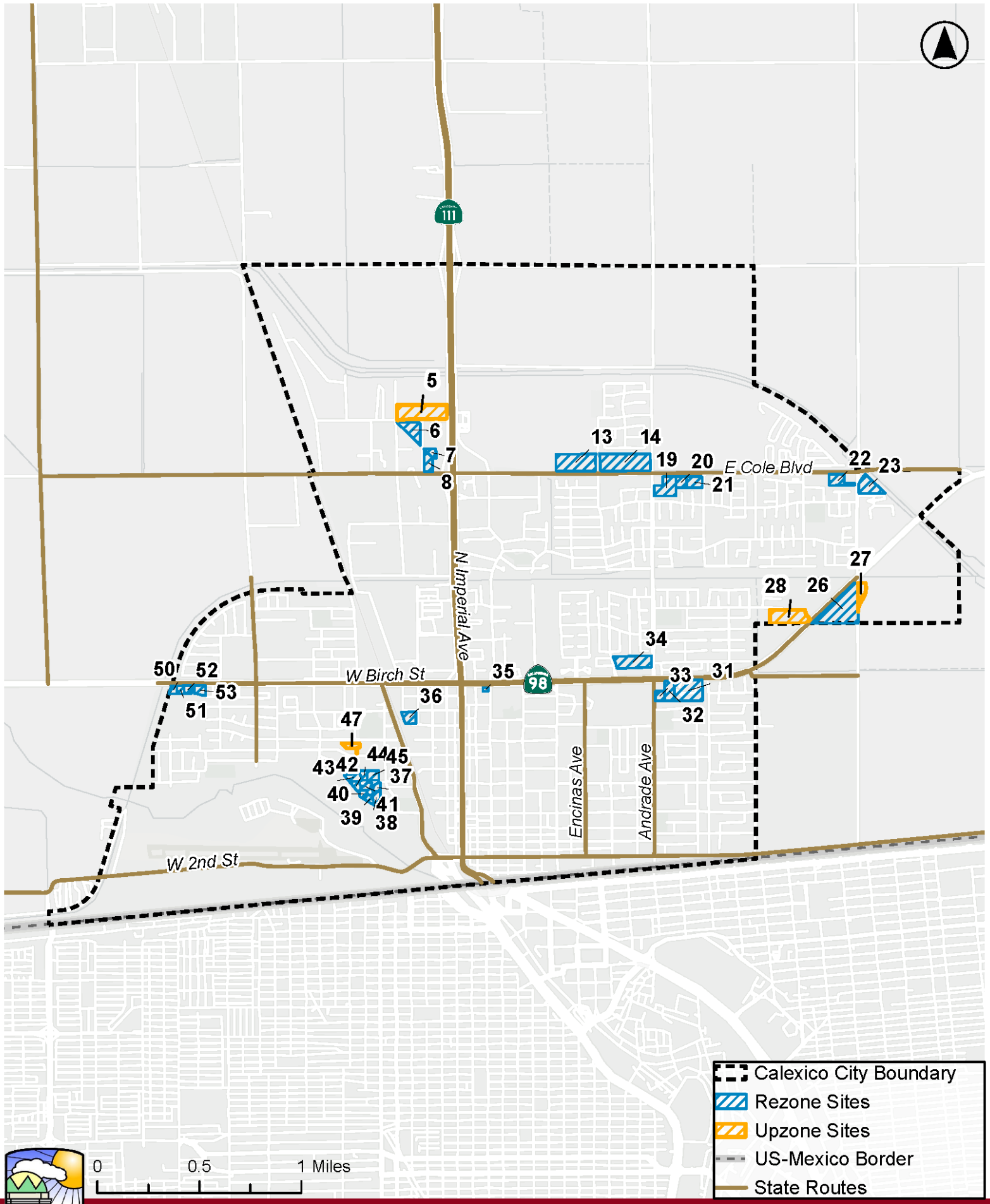


Figure 3-2:
Rezone and Upzone Sites

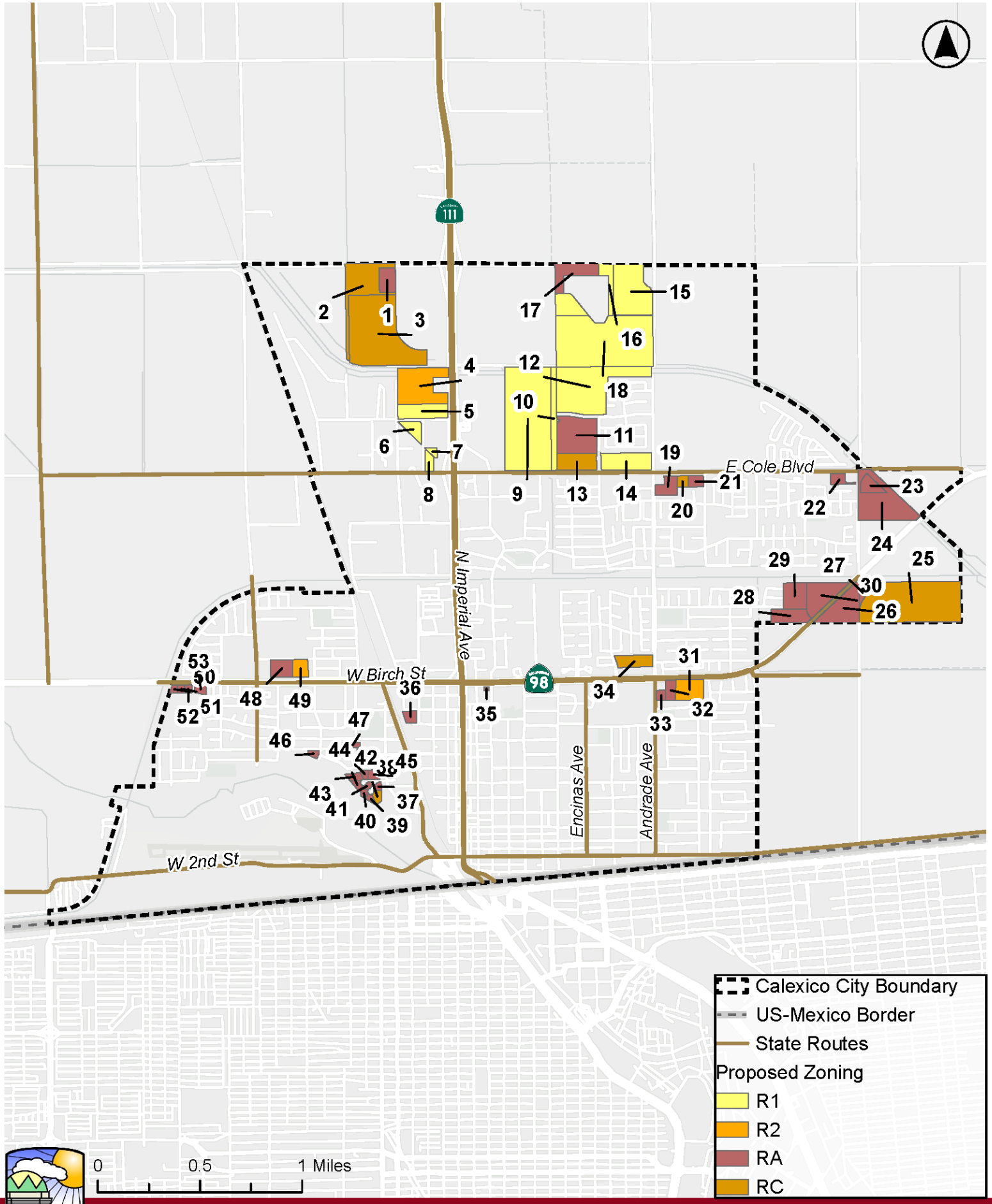


Figure 3-3:
Proposed Zoning

3.5 Associated Discretionary Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to approve or how to carry out a project. Approval of the proposed project would require the following discretionary actions.

1 **General Plan Amendments:** General Plan map and text amendments are included as part of this project to ensure consistency amongst the General Plan Elements. This includes redesignating land uses and adjusting residential densities to be consistent with proposed rezones, including the Bowker site change from residential to industrial. Amendments may include policy and density changes to be consistent with the Housing Element.

2 **Zoning Ordinance Amendments:** Zoning Ordinance amendments are included as part of this project to ensure consistency between the General Plan and the Zoning Ordinance. Zoning ordinance amendments will include the adoption of identified rezones, including the Bowker rezone site from residential to industrial.

3 **Discretionary Actions from Housing Element Programs:** While the EIR is intended to cover all Housing Element policies and programs, as summary of the programs that may involve discretionary actions including amendments to the General Plan, Zoning Ordinance, or Municipal Code include:

Housing Element Program 2B Rezoning and Redesignation to Address the RHNA: The City will modify the Zoning Ordinance Amendment to amend the Commercial Specialty (C-S) Zone to allow for a maximum density of 30 dwelling units per acre (du/acre) and a minimum density of 20 du/ac. This would also upzone parcels that are already zoned for residential development to increase the allowed density on the parcels in keeping with State law regarding sites used to address the lower income shortfall. The maximum density on these parcels will be at least 25 du/ac, and the minimum density will be 20 du/ac.

Housing Element Program 2C Encourage Development of Housing Sites Listed in Inventory: The City will continue to encourage and facilitate residential and/or mixed-use development on housing sites by providing technical assistance to interested developers for site identification and entitlement processing. This includes amending the Zoning Ordinance to establish a ministerial review process to streamline development of all by-right housing sites. Additionally, the City will look to reduce minimum lot sizes, lot coverage limits, parking requirements, and setback requirements in all residential zones to facilitate development of inventory sites.

Housing Element Program 2D Accessory Dwelling Unit (ADU) and Junior Accessory Dwelling Unit (JADU) Development Incentives and Monitoring: The City will create a monitoring and incentive program to track ADU and JADU creation and

affordability levels throughout the planning period. These actions may include additional incentives for ADU development or identification of adequate sites to meet the City's identified unaccommodated need. As part of this program, the City will amend Zoning Ordinance to implement SB 9 to facilitate development of ADUs in accordance with
this statue.

Housing Element Program 2E: The City will amend the Municipal Code to permit residential uses by-right for housing development in which at least 20 percent of the units are affordable to lower-income households for sites that:

- Are non-vacant and identified in the prior planning period; and
- Vacant sites included in two or more consecutive planning periods.

As part of Program 2E Implementation, the Zoning Ordinance shall be amended to establish a ministerial review process for by-right housing project, concurrent with adoption of the 6th Cycle Housing Element. The by-right housing ordinance will require by-right sites to comply with applicable mitigation from this DEIR.

Housing Element Program 2F Mitigating Constraints for the Development of Affordable Housing Projects: The City will work with affordable housing developers to develop a pre-approved list of incentives to promote the development of affordable housing. Such incentives may modify development standards that could constrain the development of affordable housing. This program will Update the City's Municipal Code to increase the height limit in the RC and RA multi-family zones and the CS (Commercial Specialty) applicable to residential development in Downtown Calexico; reduce minimum lot sizes, lot coverage limits, parking requirements, and setback requirements in all residential zones; and amend Subdivision Ordinance and Zoning Ordinance to allow lot splits in accordance with SB 9 and SB 1123.

Housing Element Program 3F Emergency Shelters, Transitional, and Supportive Housing: The City will amend the Zoning Ordinance to comply with State Law, to:

A. Allow supportive housing as a use permitted by-right in all zones where multiple family and mixed-use development is permitted, as per AB 2162.
B. Address permit requirements, objective standards, analysis of annual and season needs, and parking and other applicable standards and provisions, as per AB 139.
C. Expand the definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care, as per AB 2339.

Housing Element Program 3I Single-Room Occupancy (SRO) Units: The City will update the Municipal Code to explicitly identify where Single Room Occupancy

(SROs) are allowed. This will include SRO requirements and processing procedures to encourage and facilitate the use.

Housing Element Program 4A Objective Design Standards: The City will update the Municipal Code to include objective design standards, compliant with State Housing law. The City will amend existing development standards, as appropriate, to address subjective standards as applicable to projects with a minimum affordable housing component. As part of Program 4A, the City will adopt a by-right housing ordinance to process qualifying by-right projects ministerially.

Housing Element Program 4B SB 35 Streamlining: The City will update the City's Municipal Code or website with written procedures consistent with what is required by SB 35.

Housing Element Program 4C Large Residential Opportunity Sites Program: The City adopt a Large Residential Opportunity Side Program encourage the development of larger existing sites/parcels for the development of housing, specifically housing that is affordable to lower income households.

Housing Element Program 4E Amend the City's Zoning for Compliance with State Law and to Reduce Governmental Constraints on the Development of Housing: The City will update the Municipal Code to comply with State law and reduce governmental constraints on the development of housing, including:

A. To allow for Manufactured and Mobile homes as a by-right use in all residential zones and only subject to the same standards as single-family residential uses.
B. To allow group homes for both six and fewer and seven or more persons in all zones allowing residential uses based on objective criteria to facilitate approval certainty without a conditional use permit.
C. remove any subjective findings for a conditional use permit, including, but not limited to, "The harmful effect, if any, upon desirable neighborhood character".

Housing Element Program 5A Affirmatively Further Fair Housing: The City will amend the Municipal Code to establish an objective Reasonable Accommodation procedure for persons with disabilities, pursuant to AB 686.

Housing Element Program 5D Supportive Housing / Low Barrier Navigation Centers: The City will amend the Municipal Code to establish supportive housing and low barrier navigation centers 'by right' if the project meets requirements established by State Law.

Housing Element Program 5E Housing for Persons with Developmental Disabilities: The City will amend the Municipal Code to include incentives to encourage the development of housing for persons with developmental disabilities,

potentially including promotion to developers of the benefits of density bonuses and related incentives, identification of potential funding opportunities, offering expedited entitlement processing, and offering fee waivers and/or deferrals, to encourage the development of affordable housing for seniors within residential and mixed-use developments

Housing Element Program 5F Agricultural Employee and Farmworker Housing: The City will amend the Municipal Code to allow Farmworker Housing and define employee housing in accordance with State Law.

Housing Element Program 5K Anti-Displacement Plan: The City shall adopt an anti-displacement plan to relieve displacement pressures caused by the gap between local incomes and housing prices in the region.

4.1 Agricultural Resources

This section analyzes potential impacts to agricultural resources that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). This section describes the existing agriculture and forestry conditions of Calexico and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

4.1.1. Existing Conditions

4.1.1.1. Regional and Local Agricultural Setting

The City of Calexico is located in the southern portion of Imperial County, which covers an area of approximately 4,597 square miles, and is one of the most productive agricultural regions in California. Agricultural activities in the region are supported by fertile soils, a long growing season, and extensive irrigation infrastructure supplied solely by the Imperial Irrigation District (IID) through Colorado River water deliveries. Major agricultural crops produced in the Imperial Valley include alfalfa, vegetables, field crops, and forage crops.

Although the City of Calexico is predominantly urbanized, agricultural operations and undeveloped farmland occur adjacent to portions of the city limits and surrounding unincorporated areas of Imperial County. Agricultural land uses in the vicinity of the City contribute substantially to the regional economy and represent an important land use resource within Imperial County.

Agricultural operations surrounding the City rely on an extensive irrigation and drainage network maintained by IID. Agricultural activities in the region may include crop cultivation, harvesting, equipment operation, pesticide application, and truck transport associated with farming operations. These activities can generate dust, noise, odors, and traffic that may affect nearby urban uses.

Farmland Classification

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), last updated in 2022, classifies agricultural lands based on soil quality and agricultural productivity. The DOC applies specific criteria for the purposes of categorizing important farmlands. FMMP categories include Prime Farmland, Farmland of Statewide

Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land as follows:

- **Prime Farmland** is farmland with the best combination of physical and chemical features (soil quality, growing season, moisture supply) able to support long-term agricultural production. This land has the soil quality, growing seasons, and moisture needed to produce sustained high yields.
- **Farmland of Statewide Importance** is farmland other than Prime Farmland with a good combination of physical and chemical characteristics but with minor shortcomings, such as greater slopes or less ability to store soil moisture. The land must also have been under irrigated production within the past 4 years.
- **Unique Farmland** is land consisting of lesser quality soils used to produce the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones. The land must also have been under irrigated production within the past 4 years.
- **Farmland of Local Importance** is land that would be classified as Prime Farmland or Farmland of Statewide Importance but lacks available irrigation water. This land could be planted with dryland crops of barley, oats, and wheat and includes land in production of major crops, dairy lands, or land within agricultural zones or contracts.
- **Grazing Land** is land on which existing vegetation is suited for livestock grazing. The minimum mapping unit for grazing land is 40 acres.
- **Urban and Built-Up Land** is land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for developed purposes.

As shown in Figure 4.1-1: Important Farmland, there are agricultural lands designated as Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance generally located near the City boundaries. Housing sites 2, 25, 26, and 27 contain Prime Farmland and Farmland of Statewide Importance. Housing sites 1 and 3 contain Farmland of Statewide Importance. Housing site 24b may contain Farmland of Local Importance located in proximity to agricultural land uses. The remaining housing sites within the City are made up of existing developed areas that are generally classified as Urban and Built-Up Land, or vacant agricultural lands that have not been irrigated for agricultural production within the past four years and therefore do not meet the applicable criteria for classification as Prime Farmland or Farmland of Statewide Importance including housing sites: 4, 5, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 28, 29, 30, 50, 51, 52, and 53.

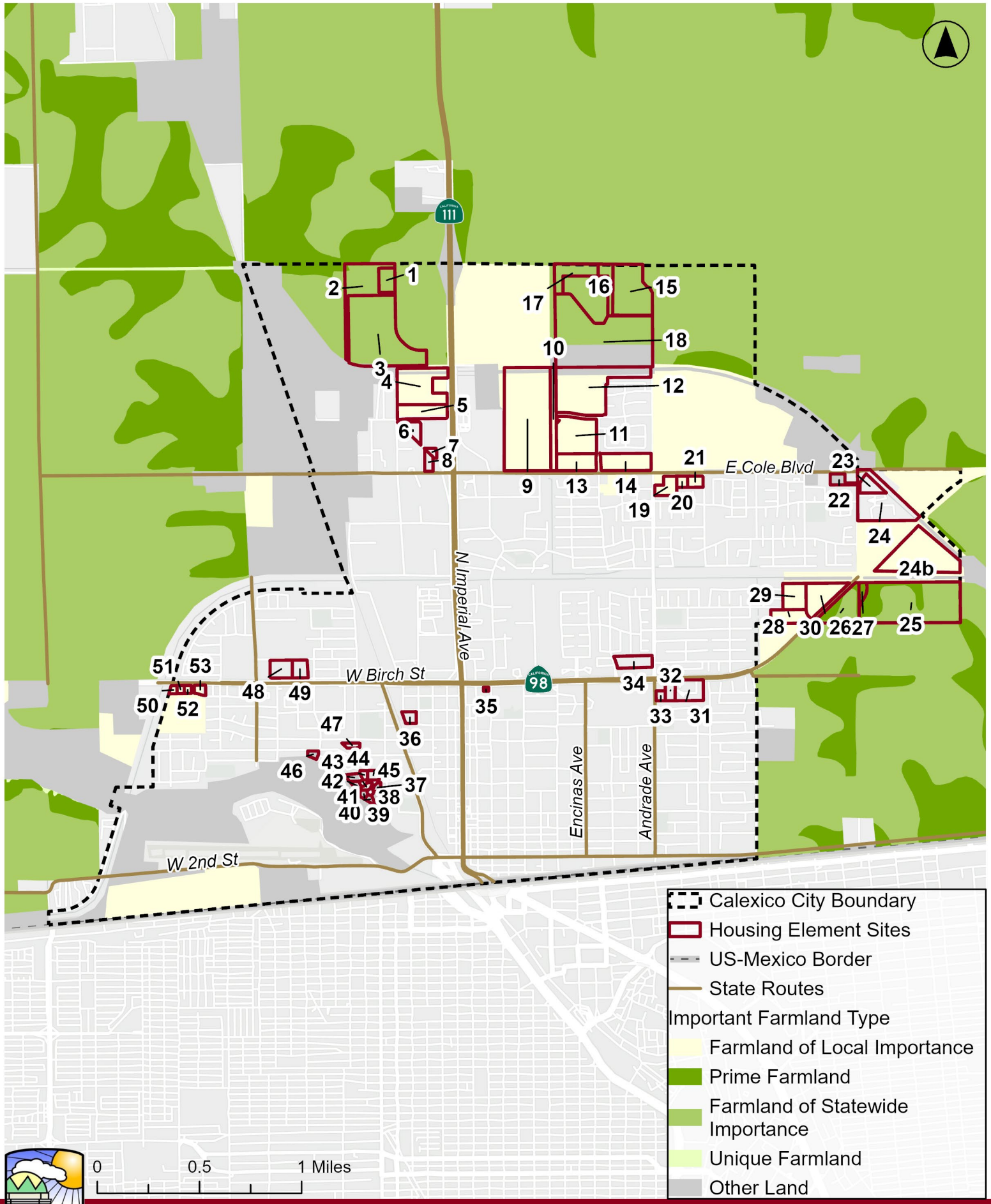


Figure 4.1-1:
Important Farmland

4.1.2. Regulatory Framework

4.1.2.1. Federal

Farmland Policy Protection Act (FPPA)

The Farmland Protection Policy Act (FPPA) is a federal law enacted in 1981 to minimize the unnecessary conversion of farmland to nonagricultural uses as a result of federally funded, permitted, or assisted projects. The FPPA requires federal agencies to consider the impacts of their actions on Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance and to evaluate alternatives that could reduce farmland conversion. The Act does not directly regulate private land use decisions or prohibit development of agricultural lands; rather, it establishes a process for assessing farmland impacts when federal involvement is present. The United States Department of Agriculture Natural Resources Conservation Service administers the FPPA and coordinates with federal agencies during project review.

4.1.2.2. State

California Land Conservation Act of 1965 (Williamson Act) and California Government Code Sections 51200 et seq.

California Government Code Sections 51200 et seq. establish the California Land Conservation Act of 1965, commonly referred to as the Williamson Act. The Williamson Act was enacted to preserve agricultural and open space lands by discouraging premature and unnecessary conversion of farmland to urban uses. Under the Act, local governments may enter into voluntary contracts with private landowners to restrict eligible land to agricultural or open space uses in exchange for reduced property tax assessments based on the land's agricultural value rather than its potential market value for development.

Williamson Act contracts generally remain in effect for an initial term of 10 years and are automatically renewed annually unless a notice of nonrenewal is filed by either the landowner or the local jurisdiction. If a contract is nonrenewed, restrictions on the property continue during the remaining term of the contract while tax benefits are gradually phased out. The Act also allows for contract cancellation under limited circumstances, subject to findings by the local jurisdiction and payment of cancellation fees. The Williamson Act is implemented locally by counties and cities and is intended to support long-term agricultural viability, reduce conflicts between agricultural and urban uses, and help maintain open space resources.

California Timberland Productivity Act of 1982, California Government Code, Section 51104(g)

The California Timberland Productivity Act of 1982, like the Land Conservation Act, was passed to encourage the production of timber resources. California Government Code, Section 51104(g), defines "Timber," "Timberland," and "Timberland Production Zone" for the purposes of the California Environmental Quality Act (CEQA) and "Timberland Preserve Zone," which may be used in city and county General Plans, as follows:

- "Timber" means trees of any species maintained for eventual harvest for forest production purposes, whether planted or of natural growth, standing or down, on privately or publicly owned land, including Christmas trees, but does not mean nursery stock.
- "Timberland" means privately owned land or land acquired for state forest purposes, which is devoted to and used for growing and harvesting timber or for growing and harvesting timber and compatible uses and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre.
- "Timberland Production Zone" means an area that has been zoned pursuant to Sections 51112 or 51113 and is devoted to and used for growing and harvesting timber or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the General Plans of cities and counties, "Timberland Preserve Zone" means "Timberland Production Zone."

County boards of supervisors may designate areas of timberland preserve, referred to as "Timberland Production Zones," which restrict the land's use to the production of timber for an initial 10-year term in return for lower property taxes.

California Agricultural Land Evaluation and Site Assessment (LESA) Model

The California Agricultural LESA Model was developed by the DOC in 1997 to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in CEQA reviews. The California Agricultural LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score becomes the basis for making a determination of a project's potential significance (DOC, 2026).

Farmland Mapping and Monitoring Program (FMMP)

The Farmland Mapping and Monitoring Program (FMMP), administered by the DOC, Division of Land Resource Protection, was established to identify, classify, and monitor agricultural lands throughout California. The FMMP provides statewide mapping information used by local agencies and decision-makers to evaluate agricultural resources and farmland conversion trends. Agricultural lands are classified based on soil quality, irrigation availability, and land use characteristics into categories including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, Other Land, and Water. Prime Farmland represents lands with the highest agricultural productivity, while other Important Farmland categories include lands that support significant agricultural production at the state or local level.

FMMP maps are updated every two years using aerial imagery, soil surveys, land use data, and field observations. Under CEQA, FMMP classifications are commonly used to determine whether a project would convert Important Farmland to nonagricultural uses. Conversion of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance may be considered a potentially significant impact and is therefore evaluated in agricultural resource analyses prepared for environmental review documents.

California Civil Code Section 3482.5 (Right-to-Farm Law)

California Civil Code Section 3482.5, commonly referred to as the Right-to-Farm Law, protects agricultural operations from nuisance claims when farming activities are conducted in a manner consistent with proper and accepted customs and standards. Under the law, agricultural activities that have been in operation for more than three years and were not considered a nuisance when established cannot generally be deemed a nuisance due to changed conditions in surrounding areas, such as encroaching urban development. The law is intended to support the long-term viability of agriculture in California by reducing conflicts between agricultural and nonagricultural land uses. Typical protected activities may include cultivation, harvesting, pesticide application, operation of farm equipment, odors, dust, noise, and other activities commonly associated with agricultural operations.

Cortese-Knox-Hertzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 governs changes in local governmental boundaries and organization, including annexations, incorporations, detachments, and sphere of influence amendments. The Act establishes Local Agency Formation Commissions (LAFCOs) in each county to oversee jurisdictional changes and promote orderly growth and development. As part of its review process, LAFCOs are required to consider the preservation of agricultural lands and open space resources when evaluating proposals involving urban expansion or annexation of agricultural areas. The Cortese-Knox-

Hertzberg Local Government Reorganization Act is intended, in part, to discourage urban sprawl, protect agricultural resources from premature conversion to urban uses, and encourage efficient development patterns and service provision. In Imperial County, the Imperial County LAFCO evaluates proposals affecting agricultural lands for consistency with applicable land use policies and agricultural resource protection objectives.

4.1.2.3. Regional

County of Imperial General Plan Agricultural Element

The 2015 Imperial County General Plan Agriculture Element establishes goals and policies intended to preserve and protect the County's significant agricultural resources and support the long-term viability of agricultural operations within the Imperial Valley. The Agriculture Element recognizes agriculture as a major economic driver and land use within the region and seeks to minimize the unnecessary conversion of productive farmland to urban or non-agricultural uses. Policies within the element encourage orderly growth patterns, compatibility between agricultural and urban land uses, conservation of important farmland, and protection of agricultural infrastructure, including irrigation and drainage systems. The Agriculture Element also promotes coordination between local agencies, landowners, and agricultural operators to reduce land use conflicts and maintain the continued productivity of agricultural lands throughout the County.

County of Imperial Local Agency Formation Commission

The Imperial County Local Agency Formation Commission (LAFCO) is charged with overseeing boundary changes between the County, cities, and special districts. The LAFCO must consider the conservation of agricultural land, preservation of open space, discourage urban sprawl when considering boundary changes (ICLAFCO, 2023).

Imperial County Right-to-Farm Ordinance

The County of Imperial Right to Farm Ordinance (No. 1031) was approved by the County Board of Supervisors on August 7, 1990. The purpose and intent of the Ordinance is to reduce the loss to the County of its agricultural resources by clarifying the circumstances under which agricultural operations may be considered a nuisance. The Ordinance permits operation of properly conducted agricultural operations within the County. The Ordinance promotes a good neighbor policy by disclosing to purchasers and users of adjacent properties the potential problems and inconveniences associated with agricultural operations.

Imperial County Williamson Act Rules and Procedures

In 2000, the County Board of Supervisors adopted the Williamson Act and the provisions established by California Revenue and Taxation Code, Section 423.3. The County Board of

Supervisors also adopted Resolution 200-084, which established the Imperial County Rules of Procedure to Implement the California Land Conservation Act of 1965 (Rules). The Rules set forth eligibility criteria and standards for the establishment of an agricultural preserve, expansion of an agricultural preserve, and removal of land from an agricultural preserve. The Rules also establish requirements for land conservation contracts and local monitoring requirements.

On February 23, 2010, the County Board of Supervisors voted to not accept any new Williamson Act contracts and to not to renew existing contracts due to the elimination of the subvention funding from the State budget. The County reaffirmed this decision in a vote on October 12, 2010, and notices of nonrenewal were sent to landowners with Williamson Act contracts following that vote. The applicable deadlines for challenging the County's actions have expired; therefore, all Williamson Act contracts in the County, including the City, were terminated by December 31, 2018. No Williamson Act contracts are in or in the vicinity of the City of Calexico.

4.1.2.4. Local

City of Calexico General Plan

The City of Calexico County General Plan provides goals, objectives, and policies for conserving agricultural lands while minimizing or avoiding conflicts with urban and other land uses. These policies include:

2007 Land Use Element

- **Policy 1.b**: New urban development shall be adjacent to existing urban development.
- **Policy 2.a**: Where land uses may result in conflicting activities, traffic, noise levels, visual character, etc., there shall be adequate buffering and/or setbacks required.

2007 Conservation and Open Space Element

- **Policy 4b**: Development in the outlying areas of the City shall occur in an orderly and contiguous manner in order to preserve the urban/rural edge.
- **Policy 5a**: Noncontiguous or "leapfrog" development should be discouraged to retain open space at the urban edge.
- **Policy 5b**: Every land use change should consider the City' s need to preserve open space.
- **Policy 5c**: Where possible, encourage infill development as a means to preserve outlying open space and to conserve resources.
- **Policy 6a**: The City should preserve Prime Farmland by focusing development on land with lesser-quality soils and maintaining a compact urban form.

- **Policy 6b**: Encourage the use of Williamson Act contracts on active agricultural lands within the City' s sphere of influence.
- **Policy 6c**: Minimize the conflicts between agricultural and residential land uses by requiring the use of buffer zones, roads, and other physical boundaries between uses.
- **Policy 6e**: The City should consider adopting a right-to-farm ordinance or the use of other regulatory tools such as zoning or subdivision review to reduce agriculture and non-agriculture land use conflicts.
- **Policy 6f**: The City should work with the County of Imperial and other surrounding cities, as well as State and local agricultural entities to establish programs related to the conservation of viable agricultural lands.

2015 Draft Agricultural Element

In 2015, the City initiated a comprehensive update to its General Plan that included preparation of an optional draft Agricultural Element intended to address the preservation of agricultural resources and the relationship between urban development and surrounding agricultural lands. The draft Agricultural Element identified goals, policies, and implementation measures related to agricultural land conservation, agricultural viability, and compatibility between urban and agricultural uses. However, the 2015 General Plan Update was never adopted by the City Council. As a result, the draft Agricultural Element does not constitute an adopted policy document of the City and does not have regulatory authority. Therefore, the draft Agricultural Element and its associated goals and policies are not considered regulatory goals, policies, or regulations for purposes of this EIR analysis. The analysis of agricultural resources is instead based on the City's currently adopted 2007 General Plan, applicable zoning regulations, and relevant State and regional agricultural resource protection programs.

City of Calexico Municipal Code

Zoning Ordinance

The City of Calexico Zoning Ordinance includes zoning districts, development standards, and land use compatibility requirements relevant to agricultural interfaces. Chapter 17.09 – Agricultural Zone, Section 17.09.410 establishes the purpose of the Agricultural Zone as preserving agricultural production until development is appropriate, maintaining the natural character of the land, and limiting incompatible development. The City currently has no parcels within its boundaries that are classified as agricultural zones.

4.1.3. Significance Determination Thresholds

The significance criteria used to evaluate the project's impacts to agriculture resources are based on Appendix G of the CEQA Guidelines. A significant impact related to agriculture resources would occur if the project would:

1) Threshold 1: 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.
2) Threshold 2: Conflict with existing zoning for agricultural use, or a Williamson Act contract.
3) Threshold 3: 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]).
4) Threshold 4: Result in the loss of forest land or conversion of forest land to non-forest use.
5) Threshold 5: 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.

4.1.4. Methodology

The agricultural resources analysis in this section evaluates the potential impacts to agricultural resources from the implementation of the Housing Element and associated discretionary actions.

The agricultural resources analysis relies on farmland classification data developed by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), existing land use and zoning information maintained by the City and Imperial County, and applicable Federal, State, regional, and local regulations related to agricultural resource conservation. Housing Element sites, as well as the Bowker site, were reviewed in relation to FMMP-designated Important Farmland and existing agricultural land uses to evaluate the potential for direct or indirect conversion of agricultural resources. The analysis also considers the programmatic nature of the Housing Element and evaluates reasonably foreseeable land use changes that could occur as a result of Housing Element implementation.

4.1.5. Issue 1: Farmland Conversion

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

4.1.5.1. Impact Analysis

Implementation of the proposed project would have a potentially significant impact if it would convert Farmland, as shown on the maps prepared pursuant to the DOC Farmland Mapping and Monitoring Program (FMMP).

As shown in Figure 4.1-1, Important Farmland, portions of the City, and multiple Housing Element sites contain lands designated as Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance. The remaining agricultural sites are considered vacant and do not meet the applicable criteria for classification as Prime Farmland or Farmland of Statewide Importance.[1] Table 4.1-1: Important Farmland, shows the total acreage of all affected farmland from the housing sites. Approximately 100 acres of Prime Farmland and 66 acres of Farmland of Statewide Importance overlap with housing sites.

Table 4.1-1: Important Farmland

	Applicable Housing Sites	Acreage of Farmland
Prime Farmland	2, 25, 26, 27	100
Farmland of Statewide Importance	1 and 3	66
	Total	**166**

Future development would be required to comply with these provisions of the Calexico General Plan, including the Land Use Element and the Conservation and Open Space Element goals and policies for conserving and maintaining important farmland and agricultural uses in the City. Adherence to these goals and policies would help offset some potential impacts related to the conversion of farmland to non-agricultural uses.

[1] Note: The conversion of City and Sphere of Influence (SOI) agricultural resources to a non-agricultural land use designation was analyzed in the 2007 City of Calexico General Plan Environmental Impact Report (City of Calexico, 2007). Additionally, the Imperial County General Plan Environmental Impact Report (Imperial County 1993) determines that conversion of Important Farmland of an area that exceeds 100 acres would constitute a significant impact to the preservation of Important Farmland, unless the area is prime farmland or part of a large area presently utilized solely for agriculture.

While adoption of the proposed project would not directly convert Farmland to nonagricultural uses, the project identifies approximately 166 acres of housing sites that are currently designated as Farmland, as shown in Table 4.1-1, Important Farmland. Future residential development of these sites could result in the conversion of important farmland to non-agricultural uses. Therefore, implementation of the project could facilitate the long-term conversion of Farmland, thus impacts would be potentially significant.

4.1.5.2. Mitigation Framework

Currently, no feasible mitigation currently exists for addressing conversion of farmland impacts of the proposed project. If the City has established an agricultural impact mitigation program prior to grading of the proposed project site, then the following mitigation measure will apply to both discretionary and by-right housing sites:

MM AG-1: The applicant shall contribute fair share fees towards, and/or shall comply with, any applicable agricultural impact mitigation program initiated by the City of Calexico or County of Imperial prior to grading of the project site. The City shall verify compliance with this measure prior to issuance of grading permits or other discretionary approvals, as applicable.

4.1.5.3. Significance After Mitigation

With implementation of **MM AG-1**, impacts associated with the conversion of Farmland would be reduced, but this mitigation is not guaranteed to occur. Additionally, the precise extent and nature of impacts that could result from the implementation of the project would be determined when specific project details are developed. Therefore, impacts relating to conversion of Farmland to non-agricultural uses would remain **significant and unavoidable**.

4.1.6. Issue 2: Williamson Act and Agricultural Zoning

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

4.1.6.1. Impact Analysis

On February 23, 2010, the County Board of Supervisors voted to not accept any new Williamson Act contracts and to not renew existing contracts due to the elimination of the subvention funding from the State budget. The County reaffirmed this decision in a vote on October 12, 2010, and notices of nonrenewal were sent to landowners with Williamson Act contracts following that vote. The applicable deadlines for challenging the County's actions have expired. Therefore, all Williamson Act contracts in the County, including in the City, were terminated on or before December 31, 2018. Therefore, no Williamson Act contracts

are located on or in the vicinity of the planning area, and no impacts would occur to Williamson Act contract lands.

In addition, none of the identified Housing Element sites are designated for agricultural use, and the project does not propose amendments to agricultural zoning districts. As such the proposed project would not conflict with existing agricultural zones.

Accordingly, implementation of the project would not conflict with agricultural zoning, result in the loss of agricultural zoning, or interfere with any Williamson Act contracts. Impacts would be less than significant.

4.1.6.2. Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.1.6.3. Significance After Mitigation

Implementation of the project would not result in the loss of Williamson Act contracted lands or interfere with the preservation of existing agriculturally zoned lands. Therefore, impacts would be **less than significant**. No mitigation is required.

4.1.7. Issue 3 and 4: Forestry

Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

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

4.1.7.1. Impact Analysis

The City is situated in a highly urbanized and agricultural desert environment and contains no forest land, timberland, or Timberland Production Zone lands. Likewise, the Housing Element sites are located within the City's developed urban area and consist of existing residential, commercial, industrial, vacant infill, and redevelopment parcels.

Because no forest land, timberland, or Timberland Production Zone lands occur within the project area, implementation of the Housing Element would not conflict with forestry zoning, cause rezoning of forest land, or result in the removal or conversion of forest resources.

Additionally, the project would not induce conversion of farmland or forest land through indirect growth-inducing effects. Because future residential growth would be directed toward infill and redevelopment sites within the existing city limits, the project would not require the extension of infrastructure into agricultural or undeveloped areas in a manner

that could facilitate the conversion of farmland or forest land. The project would therefore not contribute to the indirect conversion of agricultural or forestry resources.

Accordingly, there would be no impact as a result of the proposed project related to forest or timber land resources.

4.1.7.2. Mitigation Framework

There would be no impact. No mitigation is required.

4.1.7.3. Significance After Mitigation

The project would not rezone, convert, or otherwise affect forest land, timberland, or Timberland Production Zone lands, as such resources do not occur within the City. The project would not contribute to the conversion of forest land to non-forest use or indirectly induce the conversion of additional farmland beyond the housing sites identified in the Housing Element.

Therefore, there would be **no impact** as a result of the proposed project related to forest or timber land resources. No mitigation is required.

4.1.8. Issue 5: Other Changes to the Existing Environment

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

4.1.8.1. Impact Analysis

Implementation of the Housing Element could facilitate residential development on sites adjacent to active agricultural operations. Future residents may be exposed to dust, noise, odors, pesticide application activities, nighttime operations, and agricultural truck traffic associated with normal farming practices. Conversely, introduction of sensitive receptors adjacent to agricultural lands could increase complaints regarding routine agricultural activities, resulting in land use compatibility conflicts. While the General Plan Land Use Policy 2a requires buffering and setbacks between potentially incompatible land uses, the location, design, and intensity of future development projects are not known at this time. Therefore, the effectiveness of such measures cannot be fully evaluated at the program level. Impacts related to agricultural-residential land use conflicts are considered potentially significant.

4.1.8.2. Mitigation Framework

Both discretionary and by-right development sites may be subject to:

MM AG-2: Agricultural Compatibility and Buffering: For future discretionary development projects located adjacent to active agricultural operations, the project applicant shall prepare an agricultural compatibility assessment and incorporate appropriate measures to minimize land use conflicts between agricultural and urban uses. Such measures may include, but are not limited to:

- Physical buffers, setbacks, walls, fences, roads, landscaped areas, or drainage features between agricultural and urban uses;
- Disclosure statements notifying future residents of nearby agricultural operations and associated noise, dust, odors, lighting, pesticide application, and truck traffic;
- Site design features that minimize sensitive receptor exposure to routine agricultural activities; and
- Coordination with adjacent agricultural operators and the Imperial Irrigation District regarding access, irrigation facilities, and drainage infrastructure.

The City shall review and approve proposed compatibility measures during project-level environmental review and discretionary permit processing.

4.1.8.3. Significance After Mitigation

Implementation of **MM AG-2** would reduce impacts involving other changes in the existing environment that could result in conversion of Farmland to non-agricultural uses, though not to a less than significant level. Impacts on agricultural resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the type of Farmland and the characteristics of the proposed activity. The precise extent and nature of impacts that could result from the implementation of the project would be determined when specific project details are developed. Therefore, impacts would remain **significant and unavoidable**.

4.3 Biological Resources

This section analyzes potential impacts to biological resources that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

A programmatic Biological Resources Report was prepared in 2026 to analyze potentially significant impacts related to biological resources that could result from implementation of the project and is included as Appendix D.

4.3.1 Existing Conditions

This section provides a general overview of the biological conditions in Calexico, specifically occurring in and around the housing sites. The vegetation data contained herein is only intended for use as a tool, as site-specific surveys were not conducted for most of the sites. However, this section does provide a more detailed assessment of the existing conditions within those sites that may be eligible for by-right development.

4.3.1.1 Vegetation Communities

Vegetation in the Imperial Valley consists largely of non-native and introduced species, including date palms, grasses, ornamental trees, and shrubs. Common crops include lettuce, fruit and nut crops, alfalfa, Sudan grass and other animal feeds, carrots, melons, sugar beets, onions, wheat, and other grains. Calexico is located in an area of Imperial County characterized by disturbed habitat associated with agriculture and urban development.

In undeveloped portions of Imperial County, native flora generally occurs within eleven indigenous plant communities: desert riparian cottonwood/willow, fresh emergent wetlands and freshwater marsh, alluvial washes, palm oases, creosote bush desert scrub, desert succulent scrub, alkali desert scrub and saltbush, sand dune, mixed chaparral, pinyon-juniper, and montane hardwood-conifer.

The Imperial Valley contains a varied combination of arid desert and water-associated habitats that support native and introduced wildlife, including resident and migratory species. Extensive cultivated areas provide foraging habitat for many birds and small mammals. Species that tolerate or benefit from human disturbance are among the most common in Imperial County and Calexico (Calexico, 2007).

As seen in Figures 4.3-1a through c, Existing Vegetation Communities and Land Covers, Eight (8) vegetation communities/land cover types were identified within the By-Right Development Sites, including Mesquite Thickets, Palo Verde Woodland, Saltbush Scrub, Open Water, Tamarisk Scrub, Agriculture, Disturbed Habitat, and Urban/Developed (Appendix D). These vegetation communities are described below:

Mesquite Thickets

Mesquite thickets include greater than three (3) percent absolute cover of mesquite trees with very low cover of herbaceous species in the understory. This vegetation community is often associated with riparian or aquatic habitats.

Palo Verde Woodland

The palo verde woodland vegetation community is defined by a high overall total cover of bare ground between stands.

Saltbush Scrub

This saltbush scrub vegetation community is defined by a generally open shrub canopy with a sparse understory of herbaceous plants. Saltbush scrub occurs as relatively large, contiguous habitat or small, interspersed patches in otherwise disturbed areas.

Open Water

The open water land cover type lacks vegetative cover and consists of standing or flowing water.

Tamarisk Scrub

Tamarisk scrub is a weedy, virtual monoculture of any of several tamarisk species. This vegetation community is defined by a variable cover of tamarisk, ranging from dense thickets to widely spaced individuals forming a monotypic stand. Tamarisk scrub is often associated with riparian or aquatic habitats.

Agriculture

Agricultural land typically consists of areas supporting active orchards, vineyards, and cultivated agricultural fields (Oberbauer et al., 2008). This land cover type appears to frequently support row crops and to be constantly disturbed by agricultural activities (i.e., discing, harvesting, etc.).

Disturbed Habitat

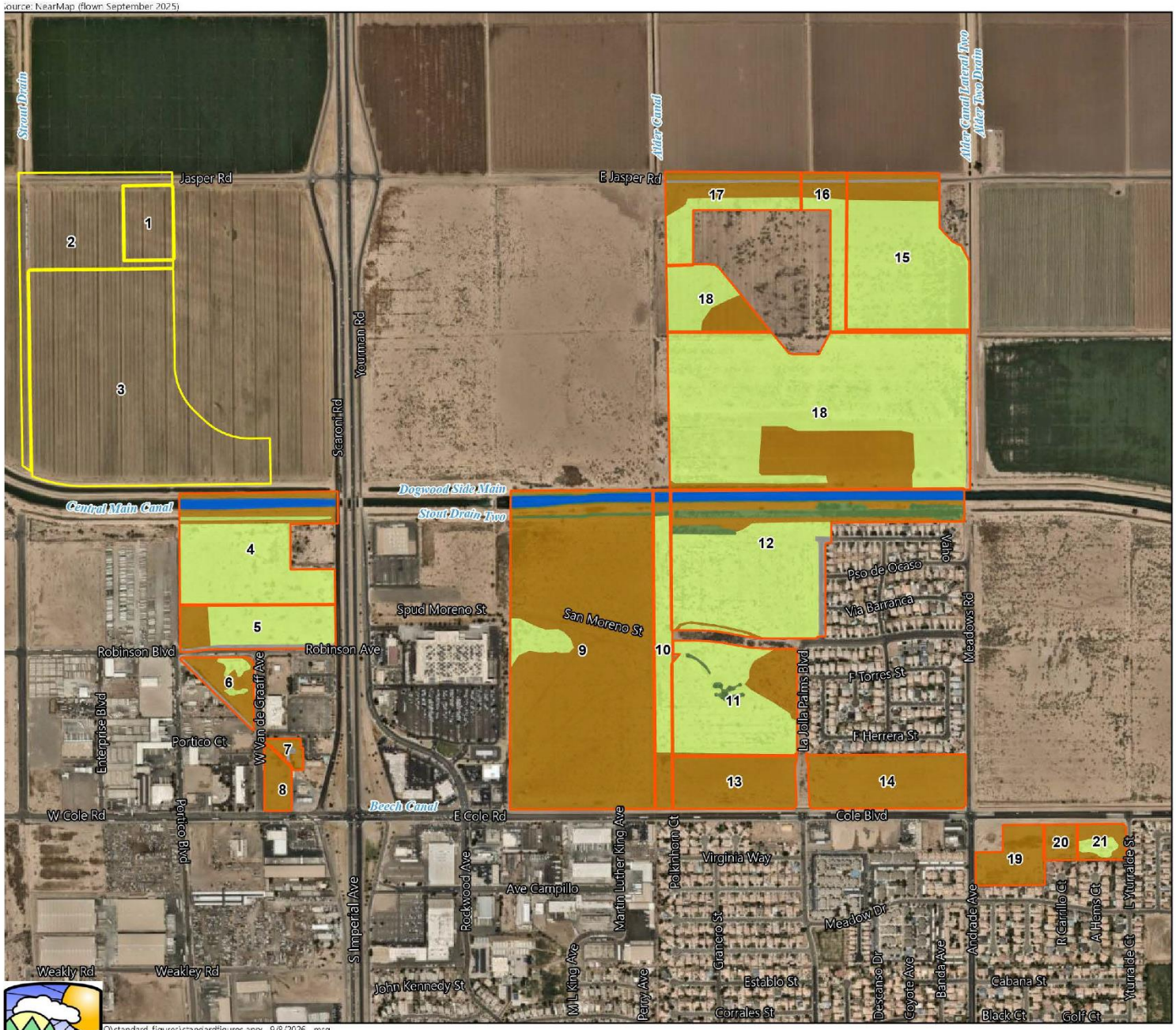
Disturbed habitat is defined as areas that have been disturbed by previous human activity, and which are no longer recognizable as a vegetation community but retain a soil substrate

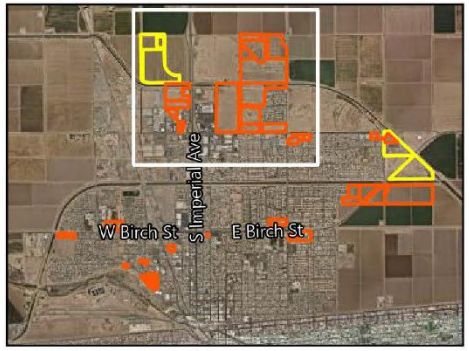
(Oberbauer et al., 2008). Disturbed habitat consists primarily of bare ground with evidence of previous disturbance and a low overall cover of non-native herbaceous plant species.

Urban/Developed

Urban/developed land is defined as areas that have been constructed upon or physically altered so that native vegetation no longer occurs (Oberbauer et al., 2008). Urban/developed land occurs in the form of paved areas, concrete-lined channels, vehicle storage areas, existing residences, or commercial buildings.

Source: NearMap (flown September 2025)





By-Right Development Sites

Discretionary Development Sites

Vegetation Communities

- Disturbed Habitat
- Open Water
- Saltbush Scrub
- Tamarisk Scrub
- Urban/Developed

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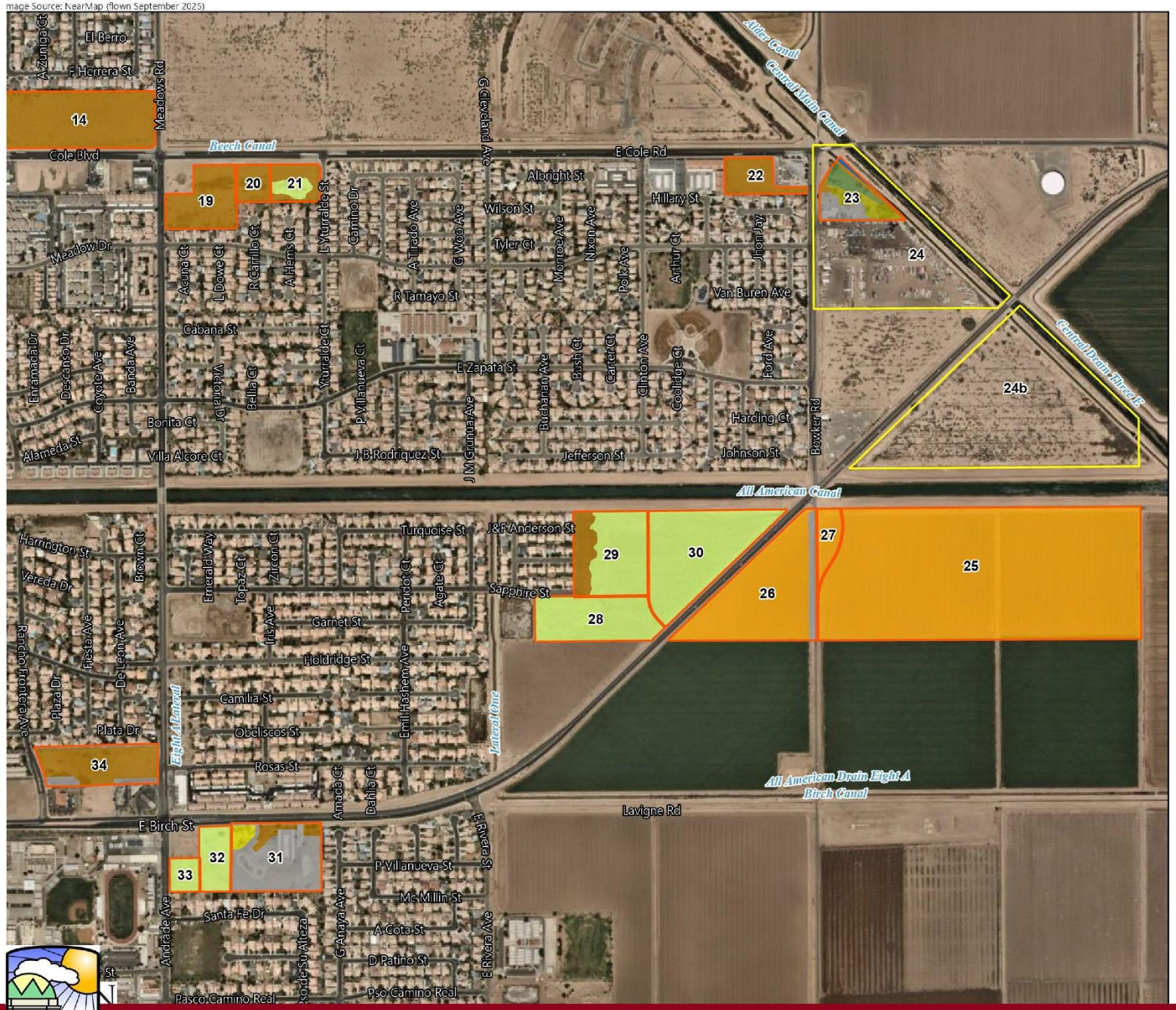
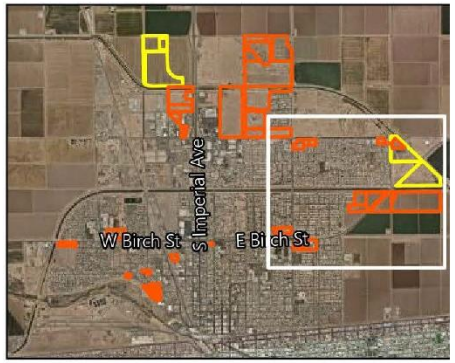
Figure 4.3-1a:

Existing Vegetation Communities and Land Cover Sites 1-21

Image Source: NearMap (flown September 2025)





- By-Right Development Sites
- Discretionary Development Sites

Vegetation Communities

- Agriculture
- Disturbed Habitat
- Mesquite Thickets
- Open Water
- Palo Verde Woodland
- Saltbush Scrub
- Tamarisk Scrub
- Urban/Developed

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Figure 4.3-1b:

Existing Vegetation Communities and Land Cover Sites 22-34

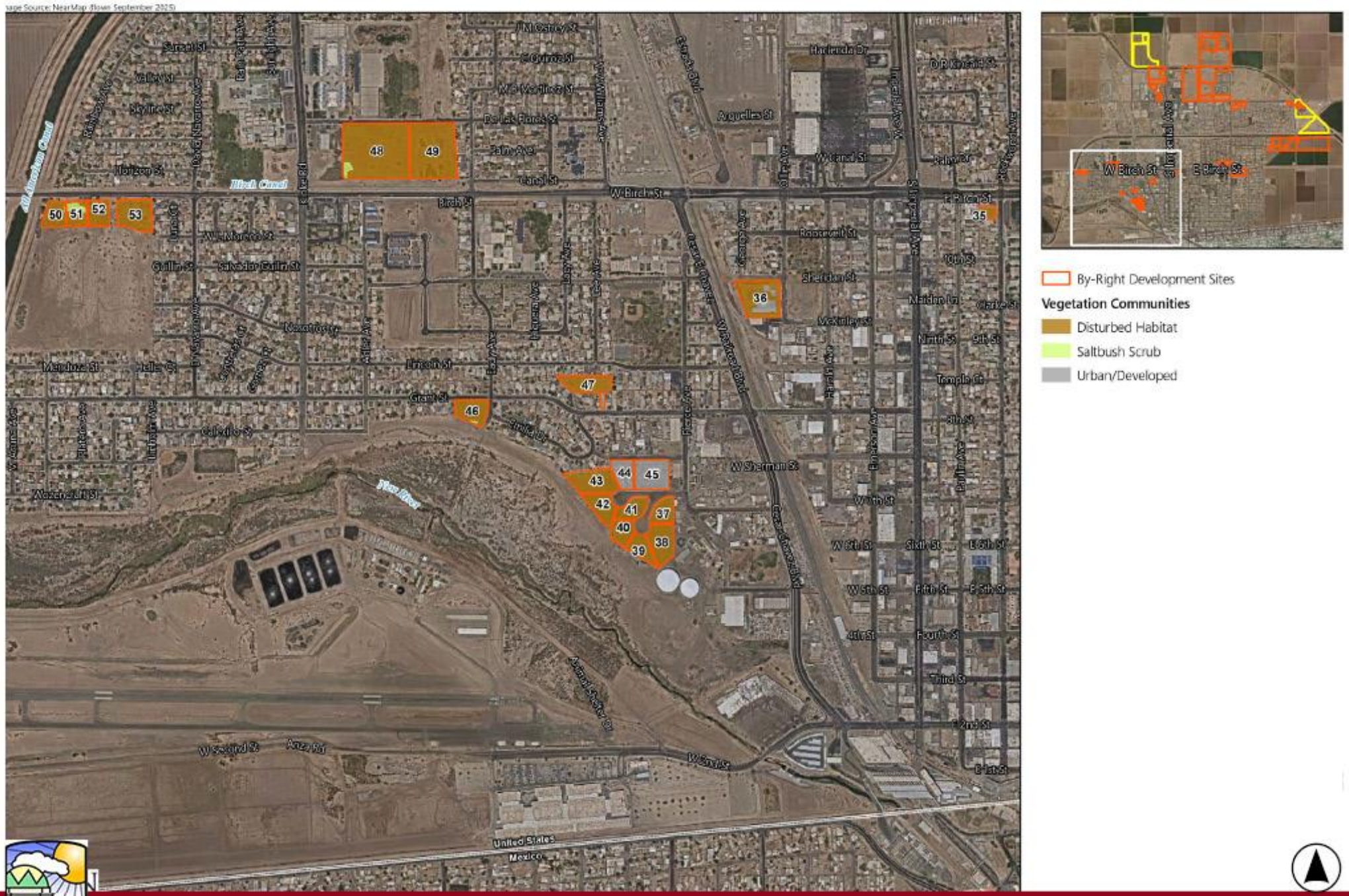


Figure 4.3-1c:

Existing Vegetation Communities and Land Cover Sites 35-53

4.3.1.2 Sensitive Species

Special-status plant species include those listed as endangered or threatened, proposed for listing, identified as candidates for listing by federal or state resource agencies such as the U.S. Fish and Wildlife Service (USFW) or California Department of Fish and Wildlife (CDFW), or designated as federal Species of Concern. Plants included on Lists 1, 2, 3, or 4 of the California Native Plant Society (CNPS) Inventory are also considered special status. CNPS is a statewide nonprofit organization of amateur and professional botanists and others interested in California's native plants. In addition to recognizing plant species listed by state and federal agencies, CNPS identifies additional species through its own ranking system.

Special-status or sensitive wildlife species include those listed by the State or federal government as threatened or endangered; proposed for listing as threatened or endangered; designated as state or federal candidates for listing or species of concern; or identified as California Fully Protected species. The California Natural Diversity Database (CNDDB), maintained within the California Department of Fish and Wildlife's Habitat Conservation Division, tracks federally and State-listed plants and animals, species of special concern, and other species considered sensitive by government agencies and the conservation community.

The proposed project area has been substantially disturbed by human activity and generally lacks habitat capable of supporting sensitive plant and wildlife species. Within Calexico, most land has been converted to urban uses, while areas surrounding the developed city are primarily agricultural. However, the New River, adjacent undeveloped land, and agricultural or irrigation ditches and canals within developed areas provide some habitat for sensitive species. Agricultural lands may also support burrowing owl habitat and provide foraging and roosting opportunities for migratory birds that winter in the region.

Nine (9) special-status plant species have been documented as occurring within the six (6) surrounding quadrangles (CNPS 2026) or within five (5) miles of the proposed project (CDFW 2026a). Of these nine (9) special-status plant species, none were determined to have a moderate or high potential to occur within the proposed project area due to lack of suitable habitat (Appendix D).

Eight (8) sensitive wildlife species have been reported within five (5) miles of the proposed project in the CNDDB, and therefore were evaluated for their potential to occur (CDFW 2026a). Of these eight (8) species, five (5) sensitive species were determined to have a moderate potential to occur in the proposed project: burrowing owl (Athene cunicularia), Yuma Ridgway's rail (Rallus obsoletus [longirostris] yumanensis), western yellow bat (Lasiurus xanthinus), pocketed free-tailed bat (Nyctinomops femorosaccus), and western

mastiff bat (Eumops perotis californicus). No critical habitat is present within the proposed project for any federally listed species.

4.3.1.3 Wetland/Riparian

Several waterways in the Imperial Valley support water distribution, use, and discharge throughout the county. The All-American Canal runs west from the Colorado River through Calexico, just north of the U.S.–Mexico border. The All-American Canal, Colorado River, Alamo River, and New River support riparian and freshwater marsh habitats. Common wetland-associated plants in these habitats include willows, western cottonwood, mesquite, velvet ash, tamarisk, big-leaf sedge, cattails, Baltic rush, bulrush, quail bush, Mojave seablite, desert lavender, seep willow, red-root nut grass, salt grass, and arrow weed (Calexico GP EIR, 2007).

As shown in Figure 4.3-2a through c, Potentially Jurisdictional Aquatic Resources, multiple housing sites contain National Wetland Inventory (NWI) and National Hydrography Dataset (NHD) mapped features (USFWS 2026b; USGS 2026). Potential jurisdictional aquatic resources include wetlands, riparian area, and non-wetland water features potentially subject to the jurisdiction of US Army Corps of Engineers (USACE) under Clean Water Act (CWA) Section 404, Regional; Water Quality Control Board (RWQCB) under CWA Section 401 and the California Porter-Cologne Water Quality Control Act, and/or California Department of Fish and Wildlife (CDFW) under California Fish and Game Code (CFGC) Section 1600 et seq, as described below. Additionally, Imperial Irrigation District (IID) drains are hydrologic features that carry flows from the agricultural fields in the County into the Alamo River and also directly into the Salton Sea that may be subject to agency jurisdiction.

By-Right Sites 4, 9, 10, and 12 contain mapped canal/ditch, artificial path, and riverine features; 8, 15, and 17 contain mapped canal/ditch and riverine features; 23 contains a mapped canal/ditch feature; and 13 and 50 contain a mapped riverine feature. As described above, some sites also contain tamarisk scrub and mesquite thicket. Tamarisk scrub is a riparian community typically associated with a potentially jurisdictional aquatic resource, and mesquite thickets may be considered a potentially jurisdictional resource if directly associated with a streambed feature. These features may meet the definition of jurisdictional aquatic resources by the USACE, RWQCB, and/or CDFW, but would require a formal site-specific aquatic resources delineation and report to confirm the extent of the aquatic resources and their anticipated jurisdictional status.

Discretionary Development Sites 2 and 3 contain a mapped canal ditch; 14 contains a mapped canal/ditch and riverine features; and 24 and 24b contain mapped canal/ditch, artificial path, and riverine features.

4.3.1.4 Wildlife Movement and Corridors

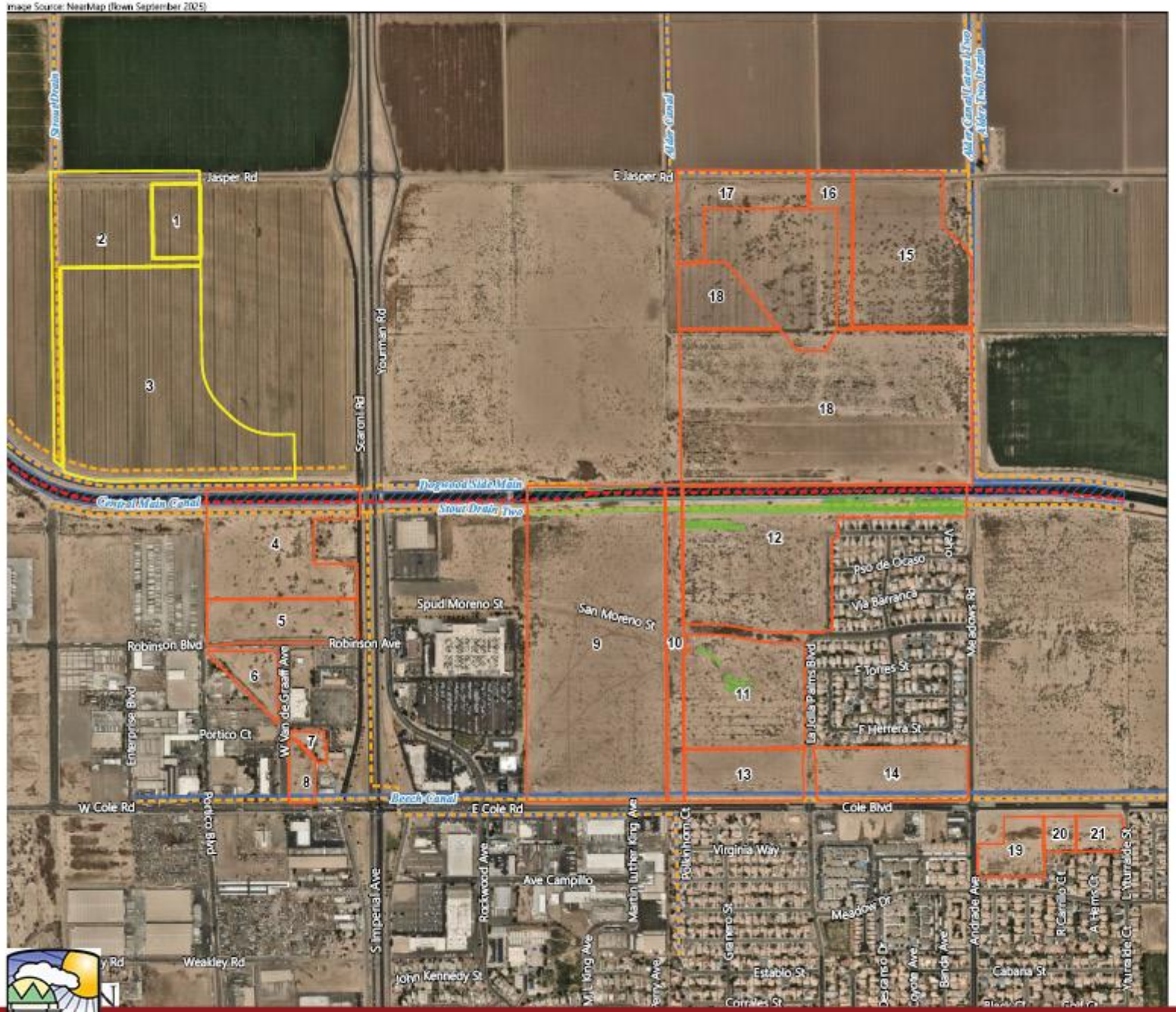
Habitat linkages and wildlife corridors connect suitable habitat across areas otherwise fragmented by terrain, vegetation changes, or human disturbance. Natural features such as drainages, ridgelines, and vegetated areas can support wildlife movement by providing access to mates, food, and water; allowing dispersal from high-density areas; and promoting genetic exchange among populations. Resource and conservation agencies consider wildlife movement corridors sensitive resources.

Most of the proposed project, including the By-Right Development Sites, has limited value for wildlife movement because the sites are surrounded by or adjacent to existing residential, commercial, and agricultural development. Native habitats within the project area are highly fragmented and do not provide functional wildlife linkages. By-Right Development Sites 39, 40, 42, 43, and 46 are located along the southern edge of the City, approximately 0.10 mile north of the New River. Although wildlife using the New River corridor could access these southern sites, the sites consist primarily of disturbed, mostly bare ground and provide little habitat value. They are also bordered by urban development to the north and the U.S.–Mexico border wall south of the New River, which limits wildlife movement along this portion of the corridor.

Two earthen, partially vegetated channels, Central Main Canal and Stout Drain Two, flow east to west through the northern portion of By-Right Development Sites 4, 9, 10, and 12. These channels have some potential to serve as a movement corridor for certain wildlife species, including Yuma Ridgeway's rail, if present. However, these channels are only intermittently vegetated and flow through an otherwise heavily developed area. Therefore, these channels are not expected to serve as a significant local or regional wildlife movement corridor.

Several sites may support nursery habitat for special-status bats, including maternal roost sites. Based on Google Street View imagery (2026), Sites 23, 50, 51, and 53 contain large palm trees, many with untrimmed dead fronds that provide suitable microhabitat for western yellow bat roosting. Abandoned buildings and lightly used infrastructure, such as sheds, outbuildings, and bridges, could also support maternal roosts for certain bat species.

Image Source: NearMap (flown September 2025)



By-Right Development Sites

Discretionary Development Sites

Potentially Jurisdictional Aquatic Resources

Riparian Habitat*

National Hydrography Dataset (NHD)

Canal/Ditch

Artificial Path

National Wetland Inventory (NWI)

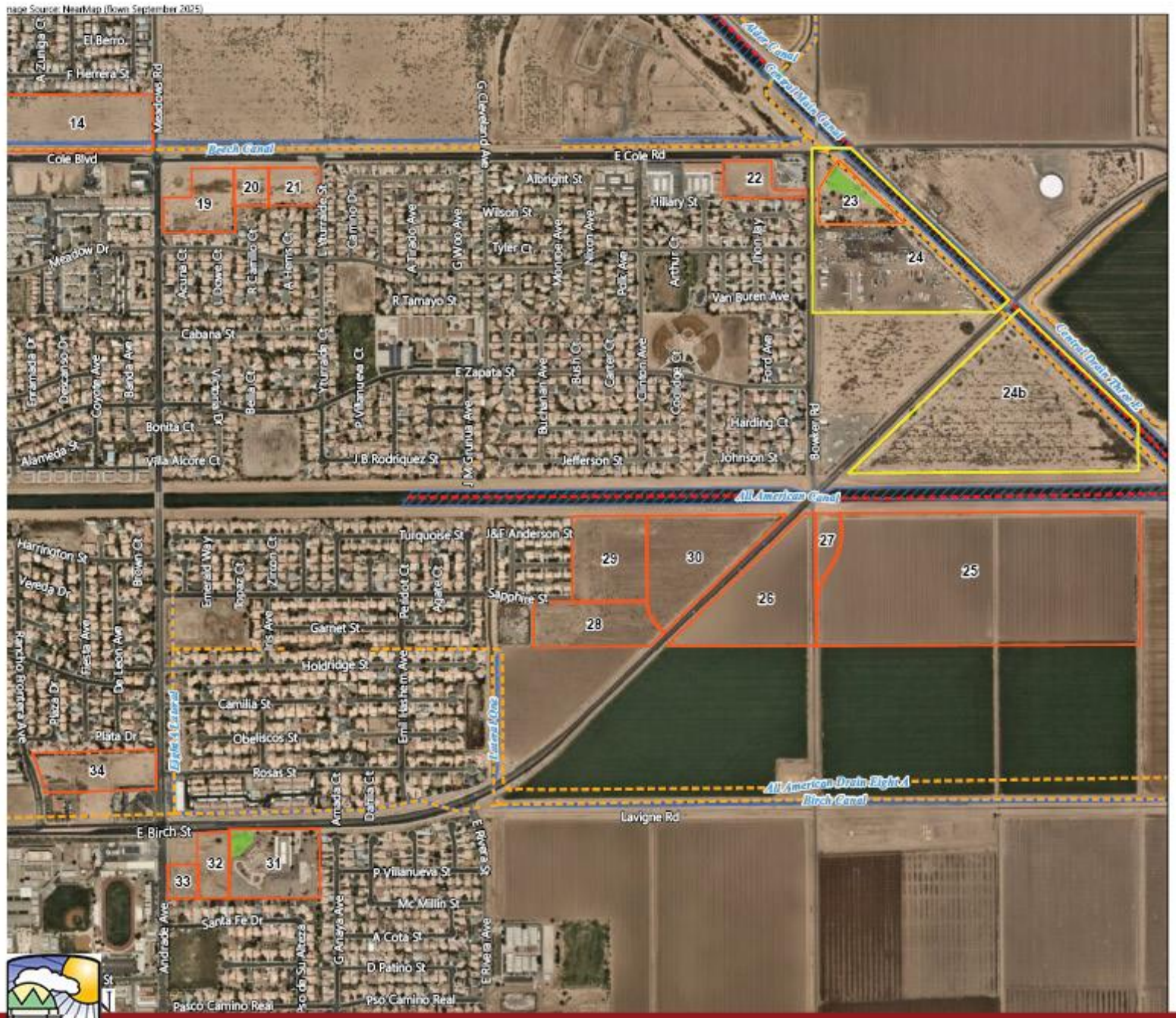
Riverine

*Includes areas mapped as Tamarisk Scrub and Mesquite Thickets per this assessment. A formal site-specific field survey (i.e., a biological assessment and aquatic resources delineation) would be required to confirm the vegetation and extent and type of potentially jurisdictional aquatic resources on-site.

CALEXICO

Figure 4.3-2a:

Potentially Jurisdictional Aquatic Resources Sites 1-21



By-Right Development Sites

Discretionary Development Sites

Potentially Jurisdictional Aquatic Resources

Riparian Habitat*

National Hydrography Dataset (NHD)

Canal/Ditch

Pipeline

Artificial Path

National Wetland Inventory (NWI)

Riverine

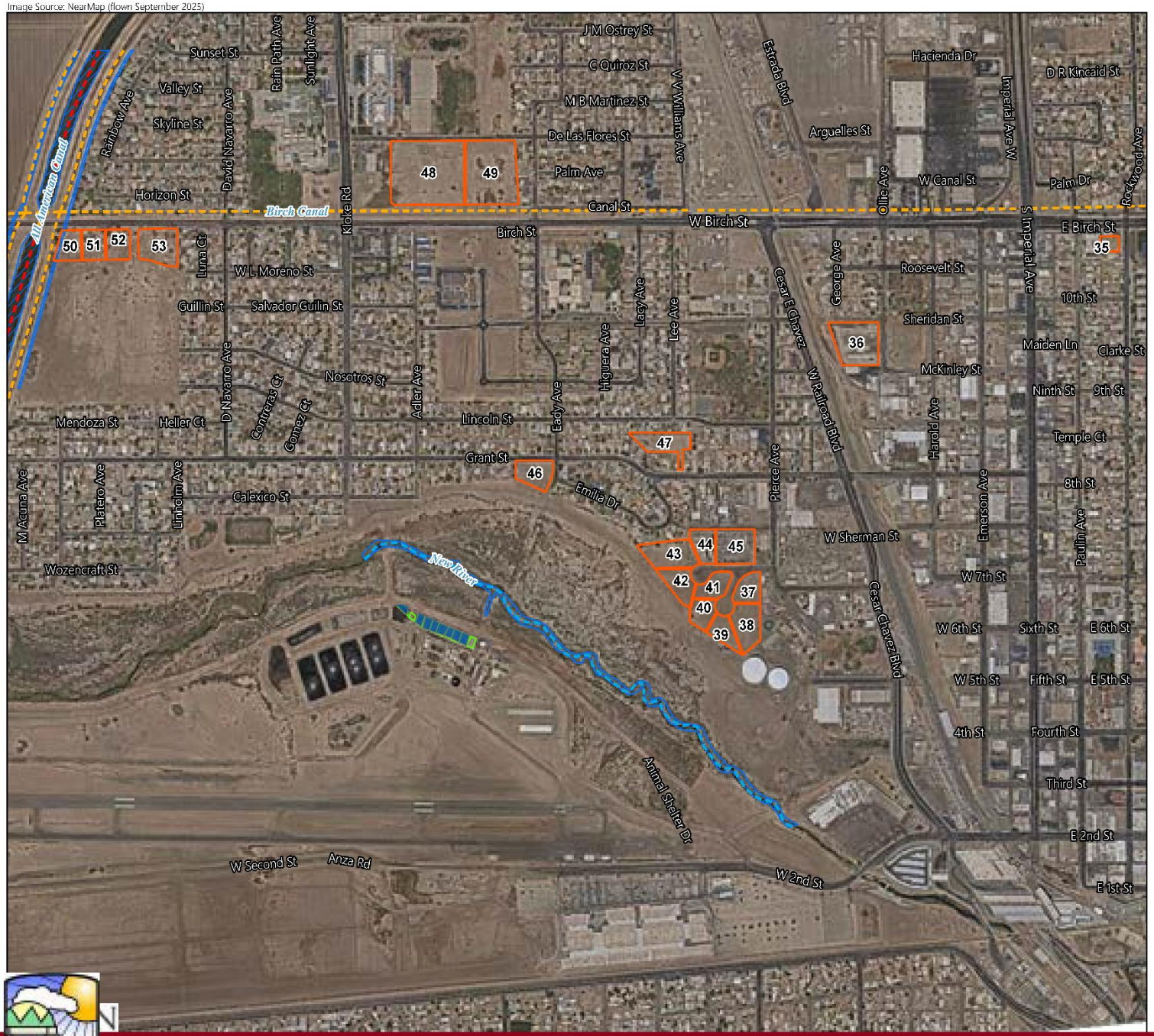
*Includes areas mapped as Tamarisk Scrub and Mesquite Thickets per this assessment. A formal site-specific field survey (i.e., a biological assessment and aquatic resources delineation) would be required to confirm the vegetation and extent and type of potentially jurisdictional aquatic resources on-site.

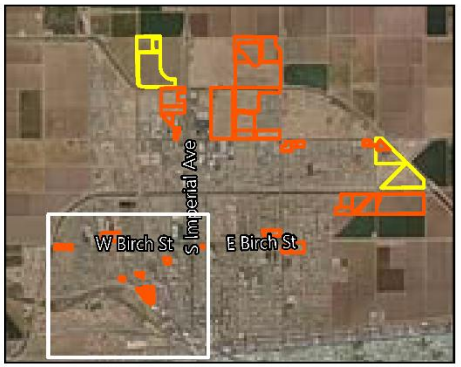
CALEXICO

Figure 4.3-2b:

Potentially Jurisdictional Aquatic Resources Sites 22-34

Image Source: NearMap (flown September 2025)





By-Right Development Sites

Potentially Jurisdictional Aquatic Resources

National Hydrography Dataset (NHD)

- Canal/Ditch
- Stream/River
- Artificial Path
- Reservoir

National Wetland Inventory (NWI)

- Freshwater Pond
- Riverine

*Includes areas mapped as Tamarisk Scrub and Mesquite Thickets per this assessment. A formal site-specific field survey (i.e., a biological assessment and aquatic resources delineation) would be required to confirm the vegetation and extent and type of potentially jurisdictional aquatic resources on-site.

CALEXICO

Figure 4.3-2c:

Potentially Jurisdictional Aquatic Resources Sites 35-53

4.3.2 Regulatory Framework

4.3.2.1 Federal

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended (16 U.S.C. Section 1531 et seq.), provides for the listing of endangered and threatened plant and animal species and the designation of critical habitat for listed animal species. FESA prohibits any person subject to U.S. jurisdiction from "taking" endangered species, including actions that harm or harass them. Under Section 7, federal agencies must consult with USFWS before approving projects to ensure listed species that may be affected receive appropriate protection.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. Section 703 et seq.) implements international treaties for the conservation and protection of migratory birds. The MBTA covers many bird species listed in 50 CFR Section 10.13. Its definition of "migratory bird" is broad and includes listed species, their mutations or hybrids, and any part, egg, or nest of such birds (50 CFR Section 10.12). Migratory birds are not necessarily special-status species, such as birds listed as endangered or threatened under the ESA. Enforced by USFWS, the MBTA prohibits pursuing, hunting, taking, capturing, killing, or attempting to take migratory birds except as authorized by regulation. Applicable regulations also prohibit possession, import, export, transport, sale, purchase, barter, or offers to conduct these activities without a valid permit or other authorization under implementing regulations (50 CFR Section 21.11).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act protects bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) by prohibiting the unauthorized "take" of either species, including their parts, nests, or eggs. Under the Act, "take" includes actions such as pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing a bald or golden eagle. The USFWS administers the Act and may authorize limited take for qualifying activities. Persons who take, possess, sell, purchase, barter, transport, export, or import a bald or golden eagle, alive or dead, or any part, nest, or egg without prior approval may be subject to criminal penalties.

Clean Water Act of 1972

The Clean Water Act (CWA) is intended to restore and maintain the chemical, physical, and biological integrity of waters of the U.S. Under Section 404, the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands. Such activities generally require a permit, either an individual permit or coverage under an approved nationwide permit. "Waters of the United States" are defined to include:

- Waters currently, historically, or potentially used in interstate or foreign commerce, including waters subject to the ebb and flow of the tide;
- Interstate waters, including interstate wetlands;
- Other waters, such as intrastate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, where their use, degradation, or destruction could affect interstate or foreign commerce;
- Impoundments of waters otherwise defined as waters of the United States;
- Tributaries of the waters identified above;
- The territorial seas; and
- Wetlands adjacent to waters identified above, other than waters that are themselves wetlands.

4.3.2.2 State

California Endangered Species Act

Similar to FESA, the California Endangered Species Act (CESA) protects species listed by the State of California as threatened or endangered. CESA recognizes the importance of conserving threatened and endangered fish, wildlife, plant species, and their habitats, and prohibits the take of endangered, threatened, or rare plant or animal species unless specifically authorized for education, scientific, or management purposes.

California Fish and Game Code Section 1600-1616

Under Fish and Game Code Section 1602, the California Department of Fish and Wildlife (CDFW) regulates activities that may divert or obstruct the natural flow of, or substantially alter the bed, channel, or bank of, any river, stream, or lake that supports fish or wildlife. CDFW also has jurisdiction over riparian habitats associated with watercourses. Jurisdictional limits are generally defined by the outer edge of riparian vegetation or the top of the stream or lake bank, whichever is wider. These requirements apply to perennial, intermittent, and ephemeral waterways. CDFW also evaluates potential impacts to fish and wildlife resources, including associated riparian habitat, and may require a Lake or Streambed Alteration Agreement before project activities begin.

California Fish and Game Code Sections 3503, 3503.5, and 3513

CFGC Sections 3503, 3503.5, and 3513 prohibit the take, possession, or destruction of birds of prey; migratory nongame birds protected by the MBTA; and the nests or eggs of protected raptors or nongame birds. These sections also prohibit the take of nongame birds under CFGC Section 3800.

California Fish and Game Code Sections 1900-1913 (Native Plant Protection Act)

California's Native Plant Protection Act prohibits the take, possession, or sale within the state of plants listed by CDFW as rare, threatened, or endangered. The Act also authorizes CDFW to salvage listed plants that would otherwise be destroyed.

Natural Communities Conservation Planning Act

The Natural Community Conservation Planning (NCCP) Program is a voluntary, landscape-level conservation program established under the California Natural Community Conservation Planning Act to protect natural communities and the species that depend on them while accommodating compatible development. Unlike the California and federal Endangered Species Acts, which focus primarily on protecting individual listed species, the NCCP Program emphasizes ecosystem-scale conservation and the long-term viability of wildlife and plant communities. Through partnerships among the California Department of Fish and Wildlife (CDFW), local governments, landowners, and other stakeholders, NCCP plans identify areas for habitat conservation and areas appropriate for development. Approved NCCP plans may serve as the basis for state and federal incidental take permits by integrating the NCCP process with the federal Habitat Conservation Plan (HCP) program, allowing covered activities to proceed while ensuring conservation of sensitive species and habitats.

State Fully Protected Species

Prior to the enactment of the California Endangered Species Act (CESA), California established a designation for Fully Protected Species to safeguard rare species at risk of extinction or extirpation. Under the California Fish and Game Code, fully protected mammals, birds, reptiles, amphibians, fish, and plants generally may not be taken or possessed except as specifically authorized by law. Many fully protected species have subsequently been listed as threatened or endangered under CESA. Amendments to the Natural Community Conservation Planning (NCCP) Act allow the incidental take of certain fully protected species when such take is authorized under a CDFW-approved NCCP. This provision aligns the treatment of covered fully protected species with that of threatened and endangered species under the NCCP program, provided their conservation and management are addressed through an approved conservation plan.

California Species of Special Concern

In addition to formal listing under FESA and CESA, certain species receive additional consideration by CDFW and lead agencies during the CEQA process. Species that may be considered for review are identified as California Species of Special Concern by CDFW. These species numbers, reproductive success, or habitat may be in decline.

4.3.2.3 Regional

Imperial Irrigation District Water Conservation and Transfer Project Draft Habitat Conservation Plan and Natural Community Conservation Plan

The Imperial Irrigation District (IID), in coordination with the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), is preparing a Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) to support implementation of the IID Water Conservation and Transfer Project and ongoing water management activities within the Imperial Valley. The HCP/NCCP is intended to provide a comprehensive, ecosystem-based conservation strategy while facilitating covered activities through the issuance of federal and state incidental take permits under the federal Endangered Species Act and the California Natural Community Conservation Planning Act. The plan area generally encompasses the IID water service area and addresses the conservation and management of covered habitats and approximately 96 fish, wildlife, and plant species over a proposed 75-year permit term. Covered activities include water conservation projects, operation and maintenance of the IID water delivery and drainage system, habitat management and monitoring, and associated mitigation measures. Once approved, the HCP/NCCP will provide long-term regulatory certainty for covered activities while implementing habitat conservation, monitoring, and adaptive management measures designed to avoid, minimize, and mitigate impacts to sensitive biological resources (IID, 2026).

Although the HCP/NCCP has not yet been approved, future development within the City of Calexico that occurs within the plan area may be subject to applicable requirements of the approved HCP/NCCP, if and when it is adopted and implemented.

Desert Renewable Energy Conservation Plan

The Desert Renewable Energy Conservation Plan (DRECP) is a joint planning effort by the California Energy Commission and the Bureau of Land Management (BLM) intended to support state and federal renewable energy and conservation objectives while streamlining permitting for renewable energy development across the Mojave and Colorado/Sonoran Desert regions of Southern California, including Imperial County. Originally, the DRECP was conceived to function as a comprehensive framework that would also satisfy FESA requirements on private lands through a General Conservation Plan, FESA requirements on BLM-administered lands, and California ESA requirements through a NCCP. However, the General Conservation Plan and NCCP components were ultimately not completed or approved. In 2016, the BLM instead adopted the DRECP Land Use Plan Amendment, which applies only to BLM-managed lands within the California Desert Conservation Area, including BLM lands located in Imperial County (BLM 2016).

Imperial County General Plan – Conservation and Open Space Element

Imperial County's General Plan Conservation and Open Space Element (COSE) sets forth policies and objectives intended to guide the protection and management of natural resources, including biological resources, throughout the county (County of Imperial, 2016). The COSE focuses on conserving sensitive habitats, special-status species, wildlife movement corridors, wetlands, and other biologically important areas. Its primary goals include:

- Supporting the protection and sustainable stewardship of Imperial County's biological resources while preventing their degradation or inefficient use;
- Conserving ecological functions and habitat values through integrated land use planning and open space preservation;
- Preserving connectivity among wildlife corridors and reducing fragmentation of natural habitats;
- Protecting jurisdictional waters, wetlands, riparian areas, and other sensitive ecological communities; and
  Implementing mitigation, restoration, and management strategies that align with regional conservation priorities within the county.

4.3.2.4 Local

City of Calexico General Plan – Conservation and Open Space Element

The Conservation and Open Space Element of the City of Calexico's General Plan includes policies intended to preserve and maintain biological resources in the City. The appropriate policies are:

- **Policy 3a**: Support regional and sub-regional efforts to conserve ecological and biological resources in the City and surrounding areas.
- **Policy 3b**: Support efforts to integrate natural wetlands treatment systems as part of the New River Improvement Project.
- **Policy 3c**: Projects of one acre or more involving alteration or development of undisturbed land shall be required to submit a biological survey conducted by a qualified biologist to the City of Calexico. A focused biological study may be required if habitat that could potentially support listed or threatened species exists on the site.

City of Calexico Municipal Code

Title 13 – Public Services

Chapter 13.50, Urban Storm Water Quality Management and Discharge Control, establishes regulations to protect water quality by reducing pollutants in stormwater runoff and illicit discharges to the City's municipal separate storm sewer system (MS4). The chapter requires implementation of best management practices (BMPs), regulates construction and post-construction stormwater management, prohibits non-stormwater discharges and illegal dumping, and provides enforcement authority to reduce pollutants entering receiving waters. These requirements help protect aquatic habitats and biological resources by minimizing erosion, sedimentation, and contamination associated with urban runoff.

Title 15 – Buildings and Construction

Chapter 15.54, Flood Damage Prevention, establishes regulations governing development within Special Flood Hazard Areas, including requirements for development permits, limitations on alterations to watercourses and floodways, standards to minimize flood damage and erosion, and review of projects affecting drainage patterns. The chapter also requires that development avoid increasing flood hazards and maintain the carrying capacity of floodways and watercourses.

Title 16 – Subdivisions

The Subdivision Ordinance requires subdivision proposals to comply with applicable City regulations and state law, including consideration of drainage infrastructure and flood hazards during the subdivision review process. Subdivision design is subject to environmental review and applicable federal, state, and local regulations.

Title 17 – Zoning

Chapter 17.17, Architectural Review, establishes design review procedures for certain development projects to ensure compatibility with surrounding development through review of site planning, landscaping, and exterior design. Discretionary review provides a mechanism for ensuring compliance with applicable environmental regulations, including CEQA, during project review.

4.3.3 Significance Determination Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to biological resources would be significant if the project would:

1) Threshold 1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.
2) Threshold 2: Have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS.

3) Threshold 3: Have a have a substantial adverse effect on wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4) Threshold 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5) Threshold 5: Conflict with the provisions of an adopted HCP, NCCP, or other approved local regional, or state HCP.
6) Threshold 6: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

4.3.4 Methodology

RECON Environmental, Inc. (RECON) conducted a search of existing biological data for all housing sites as well as the Bowker site, including a review of biological databases for sensitive plant and animal species reported within five miles of the survey area and a review of the site's physical characteristics (e.g., location, elevation, soils/substrate, topography) as part of their Biological Resources Report (Appendix D).

RECON then reviewed all proposed By-Right Development Sites (see Section 3.4.1 Eligible By-Right Development Sites) using Google Street View (Google Earth 2026) and mapped vegetation communities observed on high-resolution aerial imagery using the ArcGIS Field Map application. Special-status plant and wildlife species were analyzed based on their potential to occur within the proposed project.

Biological conditions were also assessed using publicly available geographic information system data (e.g., aerial imagery, etc.) and Google Street View (2026). Because site visits were not conducted, this analysis cannot definitively confirm the presence or absence of biological resources. Aerial imagery is limited by its resolution and may not capture small-scale habitat features. To account for these limitations, the potential for special-status plant and wildlife species to occur were analyzed conservatively based on species records, known ranges, and habitat preferences.

4.3.5 Issue 1: Sensitive and Special Status Species

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

4.3.5.1 Impact Analysis

Implementation of the proposed project would not directly authorize construction but would facilitate future development that could result in ground disturbance, vegetation removal, grading, and construction activities that have the potential to affect special-status plant and wildlife species.

A program-level biological evaluation prepared for the proposed project identified a variety of existing land cover types across the housing sites, including disturbed habitat, agricultural land, urban/developed land, saltbush scrub, palo verde woodland, mesquite thickets, tamarisk scrub, and open water associated with irrigation canals. Several of these vegetation communities, particularly saltbush scrub, mesquite thickets, tamarisk scrub, and canal-adjacent habitats, provide suitable habitat for special-status wildlife species. None of the nine special-status plant species evaluated have a moderate or high potential to occur within the project sites because suitable habitat is generally absent. Accordingly, implementation of the proposed project is not expected to substantially affect special-status plant species.

Several special-status wildlife species, however, were determined to have moderate potential to occur within portions of the project area. These include the burrowing owl, Yuma Ridgway's rail, western yellow bat, pocketed free-tailed bat, and western mastiff bat. Burrowing owl habitat may occur within undeveloped sites containing suitable soils and mammal burrows, while Yuma Ridgway's rail habitat may occur adjacent to vegetated earthen canals. Palm trees and other mature vegetation on certain sites may provide roosting habitat for western yellow bats, and suitable foraging habitat may occur for additional bat species.

Future implementation of the proposed project could result in the removal or modification of these habitats and could disturb or directly impact special-status wildlife during site preparation or construction. Additionally, construction activities occurring during the nesting season could affect nesting birds protected under the MBTA and CFGC, including ground-nesting birds such as killdeer (Charadrius vociferus). Moreover, tree trimming has the potential to result in direct take of nesting bird species, including raptors, covered under the MBTA and CFGC Sections 3503 and 3503.5. Because the proposed project does not include site-specific development proposals or detailed engineering information, the precise extent of future impacts cannot be determined at this programmatic level. Therefore, impacts associated with special status wildlife and nesting birds would be potentially significant.

Construction-related noise, night lighting, and human activity near potential nest sites, such as trees, could also indirectly affect nesting birds by causing nest abandonment and the

resulting loss of eggs or chicks. These impacts would be significant without mitigation. The avoidance measures discussed below for migratory birds and raptors are expected to prevent direct impacts and reduce indirect impacts to MBTA- and CFGC-protected avian species to less than significant.

Future Discretionary Development projects implemented under the proposed project would be subject to project-level environmental review pursuant to CEQA, as appropriate, during which site-specific biological surveys would be conducted if suitable habitat for special-status wildlife species is present as identified under **MM-BIO-1**. Both Discretionary and By-Right Development Sites would also be required to comply with applicable federal, State, and local regulations protecting special-status species, including the federal Endangered Species Act, California Endangered Species Act, California Fish and Game Code, Migratory Bird Treaty Act, and other applicable permitting requirements as part of the ministerial review process conducted by the City of Calexico in accordance with the Zoning Ordinance amendments pursuant to Program 2E in the Housing Element Update (i.e., promulgation of a new by-right development ordinance). Avoidance, minimization, and mitigation measures, including focused biological surveys, pre-construction nesting bird surveys, burrowing owl surveys, avoidance buffers, seasonal work restrictions, habitat preservation, and compensatory mitigation, would be identified as necessary during subsequent environmental review.

In addition, implementation of **MM-BIO-1** through **MM-BIO-6** would require pre-construction biological surveys, avoidance and minimization of impacts to special-status species, nesting birds, and sensitive habitats, and implementation of species-specific protection measures where warranted. These measures would reduce direct and indirect impacts to special-status species to a less-than-significant level.

4.3.5.2 Mitigation Framework

Mitigation measures **MM-BIO-1** through **MM-BIO-6** are listed in Section 4.3.11 below.

4.3.5.3 Significance After Mitigation

Although future development accommodated by the proposed project has the potential to affect special-status wildlife species through habitat disturbance and construction activities, compliance with applicable biological resource regulations, project-level CEQA review, and implementation of mitigation measures MM-BIO-1 through MM-BIO-6 would reduce impacts to candidate, sensitive, and special-status species to **less than significant with mitigation**.

4.3.6 Issue 2: Sensitive Natural Communities

Would the project have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS?

4.3.6.1 Impact Analysis

Implementation of the proposed project would not directly authorize development but would facilitate future development on housing sites throughout the City. Future development could require vegetation removal, grading, and other ground-disturbing activities that have the potential to affect sensitive natural communities where present.

The program-level biological evaluation identified the potential for direct impacts to three (3) sensitive natural communities: mesquite thickets, tamarisk scrub and open water associated with irrigation canals. The proposed project would not result in direct or temporary impacts to sensitive upland natural communities because none were confirmed to be on-site. Direct impacts to riparian habitat could occur within tamarisk scrub present within By-Right Development Site 9, 10, 11, 12, and 23. These riparian habitats may be considered jurisdictional by the USACE, RWQCB, and/or CDFW. Site 11 may support additional riparian trees other than tamarisk, but the identity of these trees was not verifiable from the aerial image. Additionally, mesquite thickets within By-Right Development Site 31 may be considered riparian habitat jurisdictional by CDFW. Even if this mesquite thicket is not considered CDFW jurisdictional, it is also a sensitive natural community and CDFW may still require mitigation for those impacts.

The Housing Element is a program-level planning document. As such, no site-specific construction activities are proposed at this time. However, future development associated with implementation of the project could result in the direct removal or modification of sensitive vegetation communities or indirectly affect their ecological functions through grading, construction, or changes in drainage patterns, if project-level activities are proposed in the future. If development is to occur as a result of project implementation, the location, design, and extent of future development within individual sites are not known at this time and would require project-level surveys to demonstrate presence, or lack thereof, of biological resources.

Construction activities could indirectly affect adjacent jurisdictional aquatic resources and native vegetation communities through altered hydrology, fugitive dust, chemical or particulate pollution, and the introduction of non-native plant species. To minimize these impacts, the proposed project would implement **MM-BIO-2**, which requires fencing around work areas adjacent to Environmentally Sensitive Areas, including aquatic resources, as well as **MM-BIO-7a**, **MM-BIO-7b**, and **MM-BIO-7c** which require delineation, permitting, and mitigation for impacts to jurisdictional aquatic resources.

If direct impacts to aquatic resources cannot be avoided, the project proponent would obtain required permits and approvals from USACE, RWQCB, and/or CDFW under CWA Sections 404 and 401, the Porter-Cologne Water Quality Control Act, and CFGC Section 1602, consistent with **MM-BIO-7a**, **MM-BIO-7b,** and **MM-BIO-7c**. These permits typically require additional minimization measures and compensatory mitigation, which may include purchasing mitigation bank credits or implementing permittee-responsible habitat preservation, enhancement, restoration, or creation.

Future discretionary projects implemented under the proposed project would be subject to project-level environmental review pursuant to CEQA, during which site-specific biological surveys and vegetation mapping would identify the presence and extent of sensitive natural communities. Where sensitive natural communities or jurisdictional aquatic resources are present, projects would be required to avoid impacts to the maximum extent feasible and comply with applicable federal, state, and local regulations, including the federal Clean Water Act, California Fish and Game Code Sections 1600–1616, and any required permits or authorizations from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board. Avoidance, minimization, restoration, and compensatory mitigation measures would be identified through the project-level review process, as necessary.

In addition, implementation of mitigation measures **MM-BIO-1**, **MM-BIO-2, MM-BIO-7a, MM-BIO-7b,** and **MM-BIO-7c** would require appropriate mitigation for any unavoidable impacts. **MM-BIO-1** would require biological resource surveys and avoidance of sensitive habitats where feasible, **MM-BIO-2** would require fencing around work areas adjacent to Environmentally Sensitive Areas, including aquatic resources, and **MM-BIO-7a**, **MM-BIO-7b**, and **MM-BIO-7c** would require delineation, permitting, and mitigation for impacts to jurisdictional aquatic resources. These measures would ensure that future development avoids or minimizes impacts to sensitive natural communities and maintains compliance with applicable regulatory requirements.

4.3.6.2 Mitigation Framework

Mitigation measures **MM-BIO-1, MM-BIO-2, and MM-BIO-7a** through **MM-BIO-7c** are listed in Section 4.3.11 below.

4.3.6.3 Significance After Mitigation

Although implementation of the proposed project could result in impacts to sensitive natural communities where future development overlaps these resources, project-level environmental review, regulatory compliance, and implementation of mitigation measures would reduce impacts to **less than significant with mitigation**.

4.3.7 Issue 3: Wetlands

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

4.3.7.1 Impact Analysis

Implementation of the proposed project would not directly authorize development but would facilitate future development on identified housing sites throughout the City. Future development could involve grading, excavation, or fill activities that have the potential to affect wetlands or other jurisdictional waters where present.

The proposed project could result in permanent direct or indirect impacts to potentially jurisdictional aquatic resources. As seen in Figure 4.3-1a-c, Existing Vegetation Communities and Land Cover, and Figure 4.3-2a-c, Potentially Jurisdictional Aquatic Resources, Sites 2, 3, 4, 8, 9, 10, 12, 13, 14, 15, 17, 23, 24, 24b, 25, and 50 contain aquatic features mapped by the National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD) may contain potentially jurisdictional resources. These mapped features, along with any unmapped canals or other aquatic features within the 53 proposed project sites and the Bowker Site, may qualify as jurisdictional aquatic resources under USACE, RWQCB, or CDFW authority. Permanent or temporary impacts to jurisdictional aquatic resources would be significant without mitigation.

A formal site-specific aquatic resources delineation would be required to confirm the extent and anticipated jurisdictional status of these resources within all sites identified in the proposed project. For Discretionary Sites, these would be conducted in accordance with **MM BIO-7a**, **MM BIO-7b**, and **MM BIO-7c**. For the By-Right Development Sites, compliance with applicable provisions of the MBTA and CFGC related to nesting birds would be required as part of the ministerial review process conducted by the City of Calexico Planning and Building Department in accordance with the Zoning Ordinance amendments pursuant to Program 2E in the Housing Element Update (i.e., promulgation of a new by-right development ordinance). Regulatory aquatic resources permitting requirements would be assessed based on the results of the formal delineation and reporting.

Future development implemented under the proposed project could result in direct or indirect impacts to jurisdictional waters or wetlands through vegetation removal, grading, placement of fill, or alteration of drainage patterns where these resources are present. However, because the proposed project is a programmatic planning document, the location and design of future development are not known, and no site-specific construction activities are proposed.

Prior to approval of future discretionary development projects, project applicants would be required to conduct site-specific biological assessments and, where appropriate, formal jurisdictional delineations to identify wetlands and other jurisdictional waters. Projects affecting jurisdictional aquatic resources would be required to comply with applicable federal and state regulations, including Sections 401 and 404 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, and California Fish and Game Code Sections 1600 through 1616. Where impacts cannot be avoided, applicants would be required to obtain permits or authorizations from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, as applicable, and implement avoidance, minimization, restoration, and compensatory mitigation measures.

In addition, implementation of mitigation measures **MM-BIO-1, MM-BIO-2, MM-BIO-7a, MM-BIO-7b, MM-BIO-7c** would require site-specific biological evaluations and the avoidance and minimization of impacts to sensitive habitats and aquatic resources where feasible. These measures, together with compliance with federal and state permitting requirements, would ensure that impacts to wetlands and other jurisdictional aquatic resources are avoided or appropriately mitigated.

4.3.7.2 Mitigation Framework

Mitigation measures **MM-BIO-1, MM-BIO-2, MM-BIO-7a** through **MM-BIO-7c** are listed in Section 4.3.11 below.

4.3.7.3 Significance After Mitigation

While future development facilitated by the proposed project has the potential to affect wetlands or other jurisdictional waters where present, compliance with applicable regulations, project-level environmental review, and implementation of mitigation measures would reduce impacts to **less than significant with mitigation**.

4.3.8 Issue 4: Wildlife Corridors

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

4.3.8.1 Impact Analysis

Implementation of the proposed project would not directly authorize development but would facilitate future development on identified housing sites throughout the City. Future development could result in the removal or modification of vegetation, increased urbanization, and construction activities that may affect wildlife movement or temporarily disturb wildlife using habitats within the project area.

As discussed in Section 4.3.1, Existing Conditions, the City of Calexico is located within a highly urbanized and agriculturally developed portion of Imperial County characterized by a network of roads, canals, developed areas, and cultivated fields. The housing sites are generally surrounded by existing urban development and do not occur within any regionally significant wildlife linkage or wildlife corridor identified by local, regional, or state planning documents. While irrigation canals and associated vegetation may provide localized movement opportunities for some wildlife species, they do not function as major regional wildlife corridors. Similarly, the project area does not support native fish migration corridors because waterways within and adjacent to the City consist primarily of engineered irrigation and drainage facilities.

Although regionally significant wildlife corridors are not present, some undeveloped sites contain vegetation communities, including saltbush scrub, mesquite thickets, tamarisk scrub, and canal-adjacent habitats, that may provide foraging habitat, temporary cover, or movement opportunities for common wildlife and certain special-status species. In addition, mature trees and shrubs may provide roosting habitat for bats and nesting habitat for migratory birds protected under the Migratory Bird Treaty Act and California Fish and Game Code. Impacts to these potentially occurring maternal bat roost sites would be significant, absent mitigation.

Implementation of Mitigation Measures **MM-BIO-1** and **MM-BIO-4** would reduce the potential for impacts by requiring biological surveys and species-specific avoidance measures prior to construction. Compliance with the Migratory Bird Treaty Act, California Fish and Game Code, the federal and California Endangered Species Acts, and other applicable regulations would ensure that future development avoids or minimizes impacts to wildlife movement and nursery sites to the extent feasible.

4.3.8.2 Mitigation Framework

Mitigation measure **MM- BIO-1** and **MM-BIO-4** are listed in Section 4.3.11 below.

4.3.8.3 Significance After Mitigation

With implementation of **MM-BIO-1** and **MM-BIO-4**, impacts to wildlife nursery sites would be mitigated to less than significant.

4.3.9 Issue 5: Habitat Conservation Planning

Would the project conflict with the provisions of an adopted HCP, NCCP, or other approved local regional, or state HCP?

4.3.9.1 Impact Analysis

There are no adopted or approved local, regional, or State HCPs or NCCPs specifically for or applicable to the City of Calexico. As such, implementation of the proposed project would not result in significant impacts to the provisions of an adopted HCP, NCCP, or other approved local regional, or state HCP (Appendix D).

4.3.9.2 Mitigation Framework

There would be no impact. No mitigation is required.

4.3.9.3 Significance After Mitigation

The project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local regional, or state HCP. IID is developing an HCP/NCCP, and the draft document identifies conservation measures that may ultimately apply; however, it is not an adopted document in which the City is currently subject to. Therefore, there would be **no impact** as a result of the proposed project related to habitat conservation planning. No mitigation is required.

4.3.10 Issue 6: Policies and Ordinances Protecting Biological Resources

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

4.3.10.1 Impact Analysis

Implementation of the proposed project would not result in any conflicts with or significant impacts to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Appendix D).

4.3.10.2 Mitigation Framework

There would be no impact. No mitigation is required.

4.3.10.3 Significance After Mitigation

The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, there would be **no impact** as a result of the proposed project related to habitat conservation planning. No mitigation is required.

4.3.11 Mitigation Measures

The following biological resources mitigation measures would be implemented during construction of projects in the planning area.

MM BIO-1: General Biological Survey and Report. Applications for future development within the Discretionary Development sites shall be required to comply with the following mitigation measure:

Prior to issuance of any construction permit or any earth-moving activities within the Discretionary Development Sites, a site-specific general biological resources survey shall be conducted to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. A biological resources report shall be submitted to the project proponent to document the results of the biological resources survey. The report shall include:

1) the methods used to determine the presence of sensitive biological resources;
2) vegetation mapping of all vegetation communities and/or land cover types;
3) the locations of any sensitive plant or wildlife species;
4) an evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and
5) an evaluation of the significance of any potential direct or indirect impacts from the proposed project.

If suitable habitat for sensitive species is identified based on the general biological survey, then focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report. If potentially significant impacts to sensitive biological resources are identified, project-level grading and site plans shall incorporate project design features to avoid or minimize direct impacts on sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to a level less than significant. Future site-specific projects shall be required to obtain all necessary permits to ensure compliance with applicable federal, state, and local regulations, such as the federal and state Endangered Species Acts.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM BIO-2: Environmentally Sensitive Areas. Environmentally Sensitive Areas identified within Discretionary Development Sites should be avoided to the maximum extent practicable. In areas near or adjacent to Environmentally Sensitive Areas (i.e., natural habitats and vegetation, wetlands, sensitive wildlife use-areas, wildlife corridors), the following measures should be followed:

Avoidance of Environmentally Sensitive Areas. In areas near or adjacent to Environmentally Sensitive Areas, construction limits shall be clearly demarcated using highly visible barriers (such as silt fencing), which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas and routes of travel. The construction areas shall be limited to the minimal area necessary to complete the proposed project. The fencing shall remain in place until the completion of all construction activities and shall be promptly removed when construction is complete.

Biological Monitoring. A qualified biological monitor shall conduct construction monitoring of all work conducted within/adjacent to Environmentally Sensitive Areas during all vegetation removal and ground-disturbing activities, such as staging and grading, for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprint and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as needed monitoring at the project sites shall occur.

Worker Environmental Awareness Program. In areas near or adjacent to Environmentally Sensitive Areas, a qualified biologist shall conduct a Worker Environmental Awareness Program training session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of both federal and state Endangered Species Acts, the general measures that are being implemented to conserve the species of concern as they relate to the proposed project, and the access routes and project site boundaries.

Best Management Practices. During future proposed project construction activities, the following best management practices (BMPs) shall be implemented:

- All equipment maintenance, staging, and dispensing of fuel, oil, or any other such activities shall occur in developed or designated non-sensitive upland habitat areas. The designated upland areas shall be located to prevent runoff from any spills from entering Waters of the U.S.
- A construction Storm Water Pollution Prevention Plan (SWPPP) and a soil erosion and sedimentation plan shall be developed (where requirements are met) to minimize erosion and identify specific pollution prevention measures that shall eliminate or control potential point and nonpoint pollution sources on-site during and following the project construction phase. The SWPPP shall identify specific BMPs during project construction to prevent any water quality standard exceedances. In addition, the SWPPP shall contain provisions for

changes to the plan such as alternative mechanisms, if necessary, during project design and/or construction to achieve the stated goals and performance standards.

- Trash shall be stored in closed containers so that it is not readily accessible to scavengers and shall be removed from the construction site on a daily basis.
- Water quality shall be visually monitored by the biological monitor to ensure that no substantial increases in turbidity occur during construction.
- All relevant natural resource permits and authorizations shall be obtained from appropriate agencies (i.e., USACE, RWQCB, and CDFW) prior to the initiation of construction activities. Permit conditions contained within the permits and authorizations shall be employed throughout the duration of the proposed project.
- Hydrologic connectivity shall be maintained within drainages during the duration of construction. Brush, debris material, mud, silt, or other pollutants from construction activities shall not be placed within drainages and shall not be allowed to enter a flowing stream.
- Dust control measures shall be implemented by the contractor to reduce excessive dust emissions. Dust control measures shall be carried out at least two times per day on all construction days, or more during windy or dry periods, and may include wetting work areas, the use of soil binders on dirt roads, and wetting or covering stockpiles.
- No pets shall be allowed in, or adjacent to, the project sites.
- Rodenticides, herbicides, insecticides, or other chemicals that could potentially harm wildlife or native plants shall not be used near or within Environmentally Sensitive Areas within or near the roadway segments.
- Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during the course of construction.
- The cleaning of equipment shall occur at least 300 feet from Environmentally Sensitive Area fencing.

Use of Native Plants. All project-related planting and landscaping shall not use plants listed on California Invasive Plant Council. Locally native plants shall be used near open space and native areas to the greatest extent feasible. No plants documented as noxious weeds by the California Department of Agriculture shall be used within planting or landscaping.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the

City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM BIO-3a: Burrowing Owl Focused Survey and Pre-Construction Survey. Future development of Discretionary Development Sites determined to have potential to support burrowing owl shall be required to comply with the following measure:

A qualified biologist shall be retained to conduct a habitat assessment and focused burrowing owl surveys in accordance with the California Department of Fish and Wildlife 2012 *Staff Report for Burrowing Owl Mitigation*. These focused surveys should be conducted either during the breeding season or non-breeding season in the year or months prior to the specific residential project if potential burrowing owl habitat is located within 500 feet of the proposed impact footprint for that project phase.

Additionally, 14-day and a 24-hour pre-construction "take avoidance" surveys for burrowing owls are required by the California Department of Fish and Wildlife 2012 guidelines prior to initial ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, grading, tree removal, site watering, equipment staging and trenching/excavation) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. These take avoidance surveys are required both inside and outside of the breeding season whenever work would occur within 500 feet of potential burrowing owl habitat. Working in collaboration with the construction contractor, the qualified biologist will ensure these survey parameters (i.e., within 14 days and again within 24 hours prior to the start of the activity) are implemented. If burrowing owl are not detected during the take avoidance survey, no further action is required. If burrowing owl are detected, mitigation measure **MM-BIO-3b** shall be followed.

MM BIO-3b: Burrowing Owl Mitigation. A Burrowing Owl Take Avoidance Plan (BUOW Plan) shall be prepared by a qualified biologist. The BUOW Plan must be sent for approval by the California Department of Fish and Wildlife (CDFW) prior to initiating ground disturbance. The BUOW Plan shall include the number and location of occupied or known burrow sites, if applicable, and shall describe proposed avoidance (setback), shelter-in-place, unoccupied burrow/burrow surrogate collapse procedures, monitoring, minimization, and/or mitigation actions. The project proponent shall implement the BUOW Plan following CDFW review and approval. Avoidance and minimization measures may include:

a. Setback: No construction activities shall occur within specified setback distances. The default setback distances from the CDFW 2012 Staff Report are provided below.

Time of Year	Level of Disturbance (meters/feet)		
	Low	Medium	High
April 1–Aug 15	200/656	200/656	500/1,640
Aug 16–Oct 15	200/656	200/656	200/656
Oct 16–Mar 31	50/164	100/328	500/1,640

When setback distances are applied to occupied burrows, an intensive monitoring program shall be implemented to ensure that the setback distance applied to the burrow is considered an effective buffer. Once a setback distance is applied to an occupied burrow, the biological monitor shall be present at all times during construction activities that occur adjacent to the setback distance to monitor the burrowing owl's behavior. The biological monitor will have the authority to increase the setback distance if the construction activities are affecting the burrowing owl. Setback distances may be reduced through shelter-in-place methods described below, which would be determined by the biological monitor.

b. Shelter in Place: If a reduced setback is needed to complete construction, shelter-in-place can be implemented to minimize impacts while allowing existing burrows to remain intact. Where appropriate, the setback buffers may be reduced by screening burrows (i.e., installing hay bales to create a visual and auditory barrier between construction and the burrow) to minimize disturbance. During the breeding season, hay bales (or other similar material) shall be stacked up to three bales high and 25 feet on either side of the burrow for a total length of 50 feet. During the non-breeding season, hay bales shall be stacked up to two bales high and 25 feet on either side of the burrow for a total length of 50 feet. Hay bales are generally three feet long and 18 inches tall. A minimum distance of five feet between the hay bales and the occupied burrow shall be left, allowing for perches near the burrow to be maintained. The minimum distance may be increased depending on the slope and topography of the area adjacent to the burrows.

If shelter-in-place is determined feasible, the biological monitor will provide guidance to the construction contractor regarding the location of the hay bales. During and following installation of the hay bales, a biological monitor shall be present daily to evaluate the effectiveness of the hay bales, monitor burrowing owl behavior for signs of stress or disturbance due to construction, and make adjustments to the buffer and/or hay bales in order to minimize impacts on the burrowing owl. If the burrowing

owl continues to appear distressed from construction, the biological monitor will have the authority to halt construction until the project proponent and the CDFW can be contacted to determine the best course of action. Following installation of the hay bales, the biological monitor shall provide a report to the project proponent and the CDFW describing the installation time frame; a map of the area; photographs of hay bales and construction activities; and a description of site conditions (e.g., surrounding vegetation, topography, observed species, burrowing owl line-of-sight conditions).

c. Burrow Collapse Procedures: No collapsing of occupied or known (i.e., those exhibiting signs of current or past burrowing owl use) burrows shall be conducted without a Section 2081 Incidental Take Permit, regardless of the time of year. Procedures for the collapse of unoccupied/potential (i.e., any subterranean hole three inches or larger for which no evidence is present to conclude that the burrow is being used or has been used by a burrowing owl) burrows shall be included in the BUOW Plan. Unoccupied and potential burrowing owl burrows may be excavated under the direct supervision of a qualified biologist after approval of the BUOW Plan.

d. If ground-disturbing activities occur but the site is left undisturbed for more than 14 days, another pre-construction "take avoidance" survey for burrowing owl shall be conducted and reported to CDFW as described above. If a burrowing owl is found, the same coordination described above shall be necessary.

No take of burrowing owl shall be conducted unless the specific project secures a Section 2081 Incidental Take Permit from CDFW. Take includes any actions that could harm burrowing owl, including but not limited to burrow exclusions on occupied or known burrows, passive relocation activities, and burrow collapse of an occupied or known burrow. Those activities shall only be conducted in accordance with the permit conditions contained in an Incidental Take Permit.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM-BIO-4: Maternal Bat Roost Avoidance. Prior to construction within any Discretionary Development Sites, the project proponent shall obtain a qualified biologist to conduct a survey of potential bat roosts for sensitive bat species, including western yellow bat, western

mastiff bat, and pocketed fee-tailed bat, located within and/or immediately adjacent to the areas where project activities have the potential to directly impact active roosts or disrupt bat breeding activities. Potential roost sites (e.g., palm fronds, trees, rock crevices, abandoned buildings, etc.) will be identified by a qualified bat biologist and searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats.

If any project activities are proposed during the bat maternity season (April 1 through August 31), a qualified biologist will conduct a dusk emergent bat survey of potential roost sites that have signs of bat use no more than two weeks prior to construction. Dusk emergence count surveys shall be conducted on a warm night when nighttime lows are not less than 45 degrees Fahrenheit and during dry weather conditions. Surveys should be conducted from approximately 15 minutes before sunset to 1 hour after sunset. Prior to any dusk emergence count, the lead biologist shall identify the primary locations where bats may be roosting so these locations can be targeted during the emergence count. Surveys should include both a visual component using night vision goggles as appropriate, as well as an electronic acoustic monitoring device/bat detector (e.g., Anabat).

If bats are detected during the dusk emergence surveys, the project proponent shall not trim or remove the roost (e.g., palm trees) until it can be determined that the bats no longer are present. In addition, if a maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM-BIO-5: Yuma Ridgway's Rail Focused Survey. If suitable freshwater marsh habitat is observed within Discretionary Development Sites during the general biological survey, the following measure would apply:

1) Focused surveys for Yuma Ridgway's rail shall be performed prior to the start of construction activities. Surveys shall include the following:
   a) A permitted biologist, holding a U.S. Fish and Wildlife Service (USFWS) 10(a)1(a) Recovery Permit for the Yuma Ridgway's rail and a Memorandum of Understanding from the California Department of Fish and Wildlife (CDFW), will conduct focused surveys consistent with the Yuma Ridgway's Rail Survey Protocol for Project Evaluation. Surveys will be conducted within the project site and a 150-meter survey

buffer. The current USFWS survey protocol requires surveys be conducted through a series of six survey passes between March 1 and May 15.

b) All Yuma Ridgway's rail detections will be recorded on standardized data forms adapted from the National Marsh Bird Monitoring Program, and their locations will be recorded using GPS devices.

c) The results of the surveys will be detailed in a 45-day letter report required by the permitted biologist's recovery permit and shall be submitted to USFWS and CDFW. One letter report will be provided to USFWS including methods and results of Yuma Ridgway's rail surveys, and a second letter report will be submitted to CDFW including methods and results of the Yuma Ridgway's rail surveys.

2) Construction in suitable marsh habitats shall occur between September 1 and February 28, which is outside the breeding season, whenever feasible.
3) Where work must occur during the breeding season, species-specific no disturbance buffers shall be established around all active nests, as determined by a qualified biologist in consultation with USFWS and CDFW. The buffer shall remain undisturbed until the nest is no longer active.
4) A qualified biological monitor shall be present during all ground-disturbing activities within or adjacent to rail habitat to ensure compliance with buffer zones and avoidance and minimization measures.
5) Noise attenuation measures shall be implemented near occupied rail habitat if work is to occur during the breeding season (typically March 1 to August 31). If predicted sound levels exceed 60 A-weighted decibels at the edge of the closest rail habitat, noise-reduction measures such as temporary sound walls or hay bale barriers shall be installed. Noise monitoring shall be conducted during construction to confirm effectiveness.
6) If an active nest is discovered during construction, work within the buffer shall cease until the nest is no longer active. Any observed mortality or disturbance shall be documented and reported to USFWS and CDFW. Additional measures shall be implemented if repeated disturbance occurs.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM-BIO-6: Avoidance of Nesting Birds and Raptors. To prevent direct impacts to nesting migratory birds or raptors protected under the Migratory Bird Treaty Act and California Fish

and Game Code, the project proponent shall implement the following within Discretionary Development Sites:

Any proposed activity that could affect nesting migratory birds or raptors shall occur outside of the general bird breeding season of February 15 to August 31. If such activities cannot be conducted outside the general bird breeding season, a qualified biologist with experience in conducting nesting bird surveys shall be retained to conduct a pre-activity nesting bird survey (i.e., prior to any project activities, such as ground disturbance or vegetation removal, that could disrupt nesting birds). The pre-activity survey shall occur within 500 feet of the construction activity and no more than three days prior to the activities to confirm the presence or absence of active bird nests.

If an active nest is found by the qualified biologist, a nest avoidance buffer of 300 feet for passerine birds and 500 feet for raptors should be demarcated by temporary fencing, flagging, and/or staking as deemed appropriate to avoid impacts. No project construction activities, including vegetation removal and/or trimming activities, will be allowed within the buffer until the qualified biologist has determined that the nest is no longer active. The qualified biologist shall monitor the active nest with sufficient frequency and duration to determine if the buffer distances are appropriately sized to protect the breeding success of the nest. Avoidance buffers may be either increased or decreased by the qualified biologist based on such factors as the avian species involved, ambient levels of human activity, and screening vegetation.

MM-BIO-7a: Formal Aquatic Resource Delineation. Future development of Discretionary Development Sites, determined to have potentially jurisdictional aquatic resources via National Wetlands Inventory and National Hydrography Dataset data, aerial imagery, or field surveys shall be required to comply with the following measure:

Prior to issuance of any construction permit, a formal, site-specific aquatic resources delineation and reporting per the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife standards and guidelines is recommended to confirm the extent of the aquatic resources on-site and anticipated jurisdictional status. The aquatic resources delineation shall be conducted following the agencies' standards and guidelines for determining the extent of jurisdictional resources present on-site. Regulatory aquatic resources permitting requirements would be assessed based on the results of the formal delineation and reporting.

MM-BIO-7b: Acquire Permits for Impacts to Jurisdictional Aquatic Resources. Prior to construction or ground-disturbing activities occurring within potentially jurisdictional aquatic resources for any future development within the By-Right and Discretionary Development Sites, the project proponent shall apply for and obtain the following regulatory

permits and approvals from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and/or California Department of Fish and Wildlife, as applicable:

- Clean Water Act Section 404 Permit;
- Clean Water Act Section 401 Water Quality Certification; and/or
- California Fish and Game Code Section 1602 Streambed Alteration Agreement.

MM-BIO-7c: Mitigation for Jurisdictional Impacts. The project proponent shall mitigate for permanent and temporary impacts to jurisdictional aquatic resources off-site in accordance with the applicable permit condition(s) described in **MM-BIO-7b**, estimated at no less than a 1:1 ratio. Temporary impacts are to be restored in place and permanent impacts shall include a minimum 1:1 establishment/re-establishment component, unless otherwise negotiated by the project proponent with the regulatory agencies.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

4.2 Air Quality

This section analyzes potential impacts to air quality that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

This evaluation includes the potential for the proposed project to result in significant emissions of criteria pollutants, toxic air contaminants (TACs), or odors. An Air Quality Technical Report including modeling data was prepared by RECON and is contained in Appendix C, Air Quality Analysis for the City of Calexico Housing Element Update of this Draft Program Environmental Impact Report (DEIR). This analysis includes criteria pollutant emission data calculated using the California Emissions Estimator Model (CalEEMod).

4.2.1 Existing Conditions

Imperial County encompasses 4,284 square miles in southeastern California. It is bordered by Mexico to the south, Arizona to the east, the Coyote and Fish Creek Mountains in San Diego County to the west, and Riverside County to the north. The Salton Trough extends northwest to southeast through the county's center and into Mexico. Elevations range from approximately 230 feet below sea level at the Salton Sea in the north to more than 2,800 feet at mountain summits to the east.

The City is located along the U.S./Mexico international border, adjacent to Mexicali, Baja California, Mexico. Its port of entry serves as a major crossing for thousands of people and substantial goods movement between the two countries. The City's economy reflects its border location and its setting within an agriculturally oriented county. Situated in a predominantly flat agricultural area with few natural features, the City is surrounded by an expansive plain interrupted mainly by the New River and Imperial Irrigation District canals. Land uses include residential, commercial, industrial/business park, and agricultural areas. The transportation system is centered on Imperial Avenue/Highway 111, which runs north/south, and Birch Street/Highway 98, which runs east/west.

4.2.1.1 Climate and Meteorology

Climate conditions at the project site, as in the rest of Imperial County, are influenced by large-scale air subsidence and warming associated with the semi-permanent tropical high-pressure center over the Pacific Ocean. This high-pressure ridge blocks most storms except during winter, when it is weakest and positioned farthest south. Coastal mountains also limit

the inland movement of cool, moist coastal air. As a result, Imperial County typically experiences clear skies, extremely hot summers, mild winters, and minimal rainfall (ICAPCD, 2017b).

Winters are mild and dry, with daily average temperatures ranging from 65 to 75 degrees Fahrenheit. Summers are extremely hot, with daily average temperatures ranging from 104 to 115 degrees Fahrenheit. Flat terrain and strong temperature differences caused by intense solar heating produce moderate winds and deep thermal convection. Together, subsiding air, surrounding mountains, and distance from the ocean substantially limit precipitation (ICAPCD, 2017b).

Surface inversions occur in Imperial County nearly every day. These inversions are difficult to disrupt and often lead to air stagnation and pollutant buildup. The highest, worst-case ozone levels are often associated with subsidence inversions (ICAPCD 2017b).

Large daily temperature swings cause substantial variation in relative humidity. Nighttime humidity rises to 50 to 60 percent but falls to about 10 percent during the day. Prevailing winds are from the west-northwest through southwest, with a secondary flow from the southeast. Westerly and northwesterly winds occur seasonally from fall through spring and are known to originate from the Los Angeles area. Imperial County occasionally experiences very high winds, with speeds exceeding 31 miles per hour most often in April and May. However, wind speeds below 6.8 miles per hour account for more than half of observed wind measurements (ICAPCD, 2017b).

4.2.1.2 Criteria Pollutants

Ozone

Ozone is the primary component of smog. Ozone is not directly emitted into the air but is formed through complex chemical reactions between precursor emissions of NOX and reactive organic gases (ROG; also known as volatile organic compounds or reactive organic compounds) in the presence of sunlight. Scientific evidence indicates that ambient levels of ozone affect not only sensitive receptors, such as asthma sufferers and children, but healthy adults as well. Exposure to ozone has been found to significantly alter lung functions by increasing respiratory rates and pulmonary resistance, decreasing tidal volumes (the amount of air inhaled and exhaled), and impairing respiratory mechanics. About half of smog-forming emissions come from automobiles.

Carbon Monoxide

Carbon Monoxide (CO) is a colorless, odorless gas that is formed when carbon in fuel is not burned completely. It is a component of motor vehicle exhaust, which contributes about 56 percent of all CO emissions nationwide. Adverse health effects associated with exposure to

CO concentrations include such symptoms as dizziness, headaches, and fatigue (U.S. EPA 2017a).

Small-scale, localized concentrations of CO above the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) may occur at intersections with stagnation points such as those that occur on major highways and heavily traveled and congested roadways. Localized high concentrations of CO are referred to as "CO hotspots" and are a concern at congested intersections, where automobile engines burn fuel less efficiently and their exhaust contains more CO.

Nitrogen Dioxide

Nitrogen Dioxide (NO2) is a brownish, highly reactive gas that is present in all urban environments. The major human-made sources of NO2 are combustion devices, such as boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines. Inhalation is the most common route of exposure to NO2. The severity of the adverse health effects depends primarily on the concentration inhaled rather than the duration of exposure. After a period of approximately 4 to 12 hours, an exposed individual may experience chemical pneumonitis or pulmonary edema with breathing abnormalities, cough, cyanosis, chest pain, and rapid heartbeat.

Sulfur Dioxide

Sulfur Dioxide (SO2) is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. SO2 is also a product of diesel engine combustion. The health effects of SO2 include lung disease and breathing problems for people with asthma. SO2 in the atmosphere contributes to the formation of acid rain.

Particulate Matter

Health studies have shown a significant association between exposure to particulate matter (PM) and premature death in people with heart or lung diseases. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and irregular heartbeat (U.S. EPA, 2017b).

Inhalable Coarse Particles (PM10)

PM10 is particulate matter with an aerodynamic diameter of 10 microns or less. Ten microns is about one-seventh of the diameter of a human hair. Under typical conditions (i.e., no wildfires), particles classified under the PM10 category are mainly emitted directly from activities that disturb the soil, including travel on roads and construction, mining, or agricultural operations. Other sources include windblown dust, salts, brake dust, and tire wear.

Inhalable Fine Particles (PM2.5)

Airborne, inhalable particles with an aerodynamic diameter of 2.5 microns or less have been recognized as an air quality concern requiring regular monitoring. Federal regulations required that PM2.5 monitoring begin January 1, 1999. Similar to PM10, PM2.5 is also inhaled into the lungs and causes serious health problems.

Lead

Lead is a metal found naturally in the environment as well as in manufactured products. At high levels of exposure, lead can have detrimental effects on the central nervous system. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions.

4.2.1.3 Existing Air Quality

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the Salton Sea Air Basin (basin or SSAB). The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed State standards set by the California Air Resources Board (CARB) or federal standards set by the U.S. Environmental protection Agency (EPA). The Imperial County Air Pollution Control District (ICAPCD) maintains air quality monitoring stations throughout the Salton Sea Air Basin (SSAB). Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The Calexico monitoring station is located within the City at Calexico High School at 1029 Ethel Street. The Calexico monitoring station measures ozone, NO2, PM10, and PM2.5. Table 4.2-1: Air Quality Measurements Recorded at the Calexico Monitoring Station provides a summary of measurements collected at the Calexico monitoring station for the years 2022 through 2024.

Table 4.2-1: Air Quality Measurements Recorded at the Calexico Monitoring Station

Pollutant/Standard	2022	2023	2024
Ozone			
Federal Max 8-hour (ppm)	0.083	0.087	0.095
Days 2015 Federal 8-hour Standard Exceeded (0.07 ppm)	6	22	29

Pollutant/Standard	2022	2023	2024
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	1	9	13
State Max 8-hour (ppm)	0.083	0.087	0.096
Days State 8-hour Standard Exceeded (0.07 ppm)	7	23	32
Max. 1-hour (ppm)	0.097	0.111	0.139
Days State 1-hour Standard Exceeded (0.09 ppm)	1	8	12
Nitrogen Dioxide (NO_2)			
Max 1-hour (ppm)	0.0602	0.1095	0.0782
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	1	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0
Annual Average (ppm)	0.0090	0.0090	0.010
PM_{10}*			
Federal Max. Daily (μg/m^3)	184.8	199.3	183.4
Measured Days Federal 24-hour Standard Exceeded (150 μg/m^3)	2	2	5
Calculated Days Federal 24-hour Standard Exceeded (150 μg/m^3)	2.0	2.0	5.1
Federal Annual Average (μg/m^3)	52.6	48.0	53.9
State Max. Daily (μg/m^3)	182.8	197.0	185.5
Measured Days State 24-hour Standard Exceeded (50 μg/m^3)	162	133	163
Calculated Days State 24-hour Standard Exceeded (50 μg/m^3)	163.9	134.1	165.2
State Annual Average (μg/m^3)	54.0	48.2	54.1
$PM_{2.5}$*			
Federal Max. Daily (μg/m^3)	41.9	40.5	59.1
Measured Days Federal 24-hour Standard Exceeded (35 μg/m^3)	5	1	9
Calculated Days Federal 24-hour Standard Exceeded (35 μg/m^3)	5.1	1.2	9.3
Federal Annual Average (μg/m^3)	10.9	9.4	10.0
State Max. Daily (μg/m^3)	41.9	40.5	59.1
State Annual Average (μg/m^3)	11.0	10.3	10.2

ppm = parts per million; μg/m^3 = micrograms per cubic meter; -- = Not available.
*Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.
SOURCE: CARB, 2026.

4.2.2 Regulatory Framework

4.2.2.1 Federal

Clean Air Act (CAA)

Ambient Air Quality Standards (AAQS) represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 (42 U.S. Code [U.S.C.] 7401) for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA (42 U.S.C. 7409), the U.S. EPA developed primary and secondary NAAQS.

Six pollutants of primary concern were designated: CO, SO2, NO2, lead, PM10, and PM2.5. The primary NAAQS "in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health . . ." and the secondary standards ". . . protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 U.S.C. 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 4.2-2: Ambient Air Quality Standards (California Air Resources Board [CARB] 2024).

If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a non-attainment area for that pollutant. The project is located within the SSAB. As discussed, the Imperial County portion of the SSAB is classified as a federal moderate non-attainment area for the 2008 8-hour ozone standards, marginal non-attainment area for the 2015 8-hour ozone standards, a partial serious maintenance area for the PM10 standards, and a partial moderate non-attainment area for the PM2.5 standards.

4.2.2.2 State

Criteria Pollutants

The CARB has developed the CAAQS and generally has set more stringent limits on the criteria pollutants than the NAAQS (see Table 4.2-2: Ambient Air Quality Standards). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Table 4.2-2: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	–	–	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m^3)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for	–	

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
				certain areas)[11]		
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chroma-tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chroma-tography			

See footnotes below.

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; – = not applicable.

[1]California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2]National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[3]Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius and a reference pressure of 760 torr. Most measurements of air quality are to be

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]

corrected to a reference temperature of 25 degrees Celsius and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4]Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

[5]National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6]National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7]Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

[8]On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9]On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standards of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10]To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of ppb. California standards are in units of ppm. To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11]On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12]The Air Resources Board has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13]The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14]In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB 2024.

Similar to the federal CAA, the State classifies either "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the CAAQS. The County is a non-attainment area for the State ozone standards and the State PM10 standard. The California CAA, which became effective on January 1, 1989, requires all areas of the State to

attain the CAAQS at the earliest practicable date. The California CAA has specific air quality management strategies that must be adopted by the agency responsible for the non-attainment area. In the case of the SSAB, the responsible agency is the ICAPCD.

Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. Diesel particulate matter (DPM) emissions have been identified as TACs. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674).

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report and collect emission data, to identify facilities having localized impacts, notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels.

The Children's Environmental Health Protection Act, California Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999), requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health.

Locally, toxic air pollutants are regulated through the ICAPCD Regulation X. Of particular concern statewide are DPM emissions. DPM is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants program.

CARB has worked on developing strategies and regulations aimed at reducing the risk from DPM. To monitor the effectiveness of the efforts to reduce DPM, CARB has supported field campaigns that measure real-world emissions from heavy-duty vehicles, and results indicate that regulations aimed at reducing emissions of DPM have been successful.

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB, 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (housing, transportation needs, economics, etc.). Sensitive land uses include, but are

not limited to, schools, hospitals, residences, resident care facilities, and day-care centers. The handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this study, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the State's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as air quality management plans, monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The CARB is the lead agency for all purposes related to the SIP under State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. All of the items included in the California SIP are listed in the Code of Federal Regulations at 40 CFR 52.220.

The ICAPCD is the air district responsible for the proposed project area. Applicable ICAPCD SIPs include the following:

- Imperial County 2009 Reasonably Available Control Technology State Implementation Plan;
- Imperial County 2009 State Implementation Plan for Particulate Matter Less than 10 Microns in Aerodynamic Diameter;
- Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM2.5 Moderate Non-attainment Area;
- Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard;
- Imperial County 2018 State Implementation Plan for the 2012 Annual Standard for PM2.5; and
- Imperial County 2018 Redesignation Request and Maintenance Plan for PM10.

4.2.2.3 Regional

Imperial County Air Pollution Control District (ICAPCD)

CEQA Air Quality Handbook

The ICAPCD adopted its *CEQA Air Quality Handbook: Guidelines for the Implementation of the California Environmental Quality Act of 1970* in 2007 and amended the handbook in December 2017 (ICAPCD 2017a). The ICAPCD CEQA Air Quality Handbook provides

guidance on how to determine the significance of impacts, including air pollutant emissions, related to the development of residential, commercial, and industrial projects. Where impacts are determined to be significant, the ICAPCD CEQA Air Quality Handbook provides guidance to mitigate adverse impacts to air quality from development projects.

Stationary Source Permitting

Pursuant to ICAPCD Rule 207 (New & Modified Stationary Source Review) and associated rules such as Rule 201 (Permits Required) and Rule 208 (Permit to Operate), the construction, installation, modification, replacement, and operation of any equipment which may emit air contaminants require ICAPCD permits. The ICAPCD requires that all such equipment be assessed for the potential to result in health risk impacts, and permits to operate equipment must be renewed each year equipment is in use or upon the modification of equipment.

Policy Number 5 – Off-site Mitigation/In-Lieu Fee

The ICAPCD issued Policy Number 5, Off-site Mitigation/In-lieu Fee, in April 2014. The policy references the ICAPCD CEQA Air Quality Handbook and discusses how project proponents may achieve additional mitigation by either proposing an off-site mitigation project or paying an in-lieu mitigation fee. Mitigation fees collected by the ICAPCD are used to fund the emissions offsets projects through the ICAPCD Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program). Specific projects funded by the program achieve emissions reductions by replacing old, highly polluting equipment with newer, cleaner equipment earlier than required by regulation or through normal attrition.

Operational Development Fee Mitigation Program

Adopted in November 2007, Rule 310, Operational Development Fee Mitigation Program, is designed to assist in the reduction of excess air emissions resulting from new residential and commercial development (warehousing is considered a commercial use under the program) in Imperial County. Funds collected by the program are used to offset NO_X and PM_{10} emissions through local emission reduction projects, such as paving unpaved roadways to reduce fugitive dust.

Fugitive Dust Control

The ICAPCD Regulation VIII regulates emissions of fugitive dust. Fugitive dust is Particulate Matter entrained in the ambient air which is caused from man-made and natural activities such as, but not limited to, movement of soil, vehicles, equipment, blasting, and wind. This excludes Particulate Matter emitted directly in the exhaust of motor vehicles or other fuel combustion devices, from portable brazing, soldering, or welding equipment, pile drivers, and stack emissions from stationary sources [ICAPCD, Rule 800 (c)(18)].

Regulation VIII includes the following specific rules:

- Rule 800–Fugitive Dust Requirements for Control of $PM_{2.5}$
- Rule 801–Construction and Earthmoving Activities
- Rule 802–Bulk Materials
- Rule 803–Carry Out and Track Out
- Rule 804–Open Areas
- Rule 805–Paved and Unpaved Roads
- Rule 806–Conservation Management Practices

ICAPCD Rule 428

Adopted on September 11, 2018, Rule 428, Wood Burning Appliances, is to limit emissions of particulate matter from wood burning appliances. This rule applies to any person who manufactures, sells, offers for sale, or operates a permanently installed, indoor or outdoor, wood burning appliance within the Imperial County $PM_{2.5}$ nonattainment area. This rule also applies to any person who installs a wood burning appliance in any residential or commercial, single- or multi-building unit within the Imperial County $PM_{2.5}$ nonattainment area.

Public Nuisance Law (Odors)

State of California Health and Safety Code Sections 41700 and 41705 and ICAPCD Rule 407 prohibit emissions from any source whatsoever in quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property.

The ICAPCD CEQA Air Quality Handbook provides screening level distances for potential odor sources. If a project is proposed within one mile of a wastewater treatment plant, sanitary landfill, composting station, feedlot, asphalt plant, painting and coating operation, or rendering plant, a potential odor problem may result (ICAPCD 2017a).

4.2.2.4 Local

City of Calexico General Plan

Implementation of the following General Plan policies will assist in minimizing adverse conditions to air conditions for the benefit of the city. The appropriate policies are:

Circulation Element

- **Policy 3.6.1.5.5a**: The City shall work with IVAG and other local and regional transit agencies to develop an adequate public transportation system that best serves the needs of the entire community.
- **Policy 3.6.1.5.5b**: The City should develop a short-range transit plan to implement an efficient and useful public transportation system.

- **Policy 3.6.1.5.5c**: By continuing its dial-a-ride demand service bus system, the City should pay particular attention to the needs of transit dependents in the community such as senior citizens, the handicapped, and low and moderate income residents when designing the overall transit plan for the City.
- **Policy 3.6.1.5.5d**: Encourage maximum utilization of the existing transit system in Calexico through education and provision of bus shelters and benches.
- **Policy 3.6.1.5.5e**: The City should require developers of new industrial, residential, or commercial projects to coordinate with the local transit provider(s) to best incorporate design features that increase the potential for public transit service and provide effective transit use as the City grows.

Public Facilities/Services Element

- **Policy 4.4.1.1.1a**: Establish funding mechanisms to fund the construction or expansion of public services and facilities necessitated by new development. The City should adopt appropriate ordinance(s) that implement impact fees and/or exactions on developers to fund the construction of public facilities caused by the new development. The ordinance should delineate methods for fee calculation to allow developers to know in advance their expected fee.
- **Policy 4.4.1.5e**: The City shall annually assess the energy usage of each public building and develop plans to conserve energy, including retrofitting for energy conservation where feasible.
- **Policy 4.4.1.5f**: All new public buildings shall be designed to be as energy efficient as is financially feasible.
- **Policy 4.4.1.11e**: The City should support regional efforts to expand and locate new landfills.

Conservation/Open Space Element

- **Policy 5.4.2.1.6c**: Minimize the conflicts between agricultural and residential land uses by requiring the use of buffer zones, roads, and other physical boundaries between uses.

Economic Development Element

- **Policy 9.6.1.1.1d**: The City shall emphasize the environmental qualities essential to the economic health of the region.
- **Policy 9.6.1.2.2j**: The City shall encourage and facilitate highway-serving commercial development along Highway 111 and State Route 98, within the City limits. Some highway-serving commercial may be appropriate along Jasper Road and Cole Road but should be sited so as not to be incompatible with adjacent proposed residential areas.

- **Policy 9.6.1.2.2k**: The City shall establish and implement strategies that gain and/or expand City access to the Interstate 8 corridor and promote the development of commercial service facilities.
- **Policy 9.6.1.4.4f**: The City shall promote a pedestrian-friendly and safe environment.
- **Policy 9.6.1.4.4g**: The City shall explore opportunities to create 'pedestrian zones' with increased landscaping, use of traffic reduction methods, adequate separation from automobile traffic, increased lighting along sidewalks.
- **Policy 9.6.1.4.4i**: The City shall promote the use of alternative modes of transportation, including bus, bicycling and walking.

4.2.3 Significance Determination Thresholds

Consistent with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, impacts related to air quality would be significant if the project would:

1) Threshold 1: Conflict with or obstruct the implementation of the applicable air quality plan.
2) Threshold 2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3) Threshold 3: Expose sensitive receptors to substantial pollutant concentrations.
4) Threshold 4: Result in other emissions (such as those leading to odors) affecting a substantial number of people.

The ICAPCD CEQA Air Quality Handbook establishes the following four separate evaluation categories (ICAPCD, 2017a):

1) Comparison of calculated project emissions to ICAPCD emission thresholds.
2) Consistency with the most recent Clean Air Plan for Imperial County.
3) Comparison of predicted ambient pollutant concentrations resulting from the project to state and federal health standards, when applicable.
4) The evaluation of special conditions which apply to certain projects.

Any development with a potential to emit criteria pollutants below significance levels defined by the ICAPCD is called a “Tier I project,” and is considered by the ICAPCD to have less than significant potential adverse impacts on local air quality. For Tier I projects, the project proponent should implement a set of feasible “standard” mitigation measures (enumerated by the ICAPCD) to reduce the air quality impact to an insignificant level. A “Tier II project” is one whose emissions exceed any of the thresholds. Its impact is significant, and the project proponent should select and implement all feasible discretionary mitigation measures (also enumerated by the ICAPCD) in addition to the standard measures.

4.2.4 Methodology

Approval of the proposed project would not specifically permit the construction of an individual project, and no specific development details are available at this program level of analysis.

Air quality impacts can result from the construction and operation of a project. Emissions were calculated using California Emissions Estimator Model (CalEEMod) Version 2022.1.1.45 (California Air Pollution Control Officers Association 2022). The CalEEMod program is a tool used to estimate emissions resulting from land development projects in the state of California.

For the purposes of this program-level analysis, emissions were calculated for the following:

- Buildout (year 2050) of the existing land use and zoning designations
- Buildout (year 2050) of the proposed Housing Element update land use and zoning designations

To evaluate potential project-level impacts for future development that could be implemented under the project, construction and operational emissions were calculated for the following:

- Site 3, which represents the greatest number of units and trips of all the 53 housing sites;
- Site 18, which represents the greatest number of units and trips of all the By-Right Development Sites;
- Bowker Site (Site 24b), which is the only site that would include a rezone from Residential Condominium to Industrial.

The significance thresholds presented in the following sections were used to evaluate the significance of future projects that would be constructed at the 53 identified sites. At the program level, the analysis quantifies emissions generated by project buildout and compares potential development to development that would occur under the existing land use and zoning designations to determine if the emissions would exceed the emissions estimates included in the ICAPCD air quality plans, and to determine whether it would obstruct attainment, or result in an exceedance of AAQS.

4.2.4.1 Operational Significance Thresholds

Operational impacts can occur on two levels: regional impacts resulting from development, or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. Table 4.2-3: Significance Thresholds for Operations provides general

guidelines for determining the significance of project-level impacts based on the total emissions that are expected from project operation established by the ICAPCD.

Table 4.2-3: Significance Thresholds for Operations

Pollutant	Tier I	Tier II
NO_X and ROG	Less than 137 lbs./day	137 lbs./day and greater
PM_{10} and SO_X	Less than 150 lbs./day	150 lbs./day and greater
CO and $PM_{2.5}$	Less than 550 lbs./day	550 lbs./day and greater

ROG = reactive organic gas; NO_X = oxides of nitrogen; SO_X = oxides of sulfur;
CO = carbon monoxide; PM_{10} =particulate matter less than 10 microns;
$PM_{2.5}$ = particulate matter with an aerodynamic diameter 2.5 microns or less; lbs./day = pounds per day
SOURCE: ICAPCD 2017a.

As stated above, Tier 1 projects are required to implement all feasible standard measures specified by the ICAPCD. Tier II projects are required to implement all feasible standard measures as well as all feasible discretionary measures specified by the ICAPCD.

4.2.4.2 Construction Significance Thresholds

Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries.

The ICAPCD has also established thresholds of significance for project-level construction. Table 4.2-4: Significance Thresholds for Construction provides general guidelines for determining significance of impacts based on the total emissions that are expected from project construction.

Table 4.2-4: Significance Thresholds for Construction

Pollutant	Thresholds (pounds/day)
PM_{10}	150
ROG	75
NO_X	100
CO	550

PM_{10} =particulate matter less than 10 microns; ROG = reactive organic gas; NO_X = oxides of nitrogen;
CO = carbon monoxide
SOURCE: ICAPCD, 2017a.

Regardless of project size, all feasible standard measures specified by the ICAPCD for construction equipment and fugitive PM10 control for construction activities should be implemented at construction sites. Control measures for fugitive PM10 construction emissions in Imperial County are found in ICAPCD Regulation VIII and in the ICAPCD CEQA Air Quality Handbook, and are discussed below.

4.2.5 Issue 1: Consistency with Air Quality Plans

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

4.2.5.1 Impact Analysis

CARB is the lead agency for preparation of the SIP, which outlines the State measures to achieve NAAQS. CARB delegates responsibility for preparation of SIP elements to local air districts and requires local air districts to prepare Air Quality Attainment Plans outlining measures required to achieve CAAQS.

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

- Imperial County 2009 State Implementation Plan for Particulate matter Less than 10 Microns in Aerodynamic Diameter;
- Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM2.5 Moderate Non-attainment Area;
- Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard;
- Imperial County 2018 State Implementation Plan for the 2012 Annual Standard for PM2.5; and
- Imperial County 2018 Redesignation Request and Maintenance Plan for PM10.

The primary concern for assessing consistency with air quality plans is whether the proposed project would induce growth that would result in a net increase in criteria pollutant emissions that exceed the assumptions used to develop the plan. The criteria pollutant emission projections for the ICAPCD air quality plans are based on SCAG population growth and regional VMT projections, which are based in part on the land uses established by local general plans. As such, projects that propose development that is consistent with the local land use plans would be consistent with growth projections and air quality plans criteria pollutant emissions estimates. In the event that a project would result in development that is less dense than anticipated by the growth projections, the project would be considered consistent with the air quality plans. In the event a project would result in development that results in greater than anticipated growth projections, the project would result in air

pollutant emissions that may not have been accounted for in the air quality plans and thus may obstruct or conflict with the air quality plans.

The proposed project would result in additional housing opportunities throughout the City consistent with the RHNA. The project would also provide for industrial uses at the Bowker Site. When compared to the existing zoning and land use designations, the proposed project would increase the residential development potential in the City; however, it would result in an overall decrease in trip generation. A total of 72,452 daily trips would be generated by the 53 sites under buildout of the existing zoning and land use designations, and a total of 59,657 daily trips would be generated under buildout of the project. The estimated decrease in trip generation with the project is primarily attributed to the Rezone Sites where the rezoning proposes a change in land use from commercial to residential, as commercial uses are typically more intensive and generate a higher number of trips within a site than residential uses. The project would promote land use patterns and housing programs that would also facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services. Total emissions associated with buildout of the existing and proposed zoning and land use designations are included in Table 4.2-5: Total Operational Buildout Emissions.

Table 4.2-5: Total Operational Buildout Emissions

Source	Pollutant (pounds per day)					
	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
SUMMER						
Adopted Land Use and Zoning Designations (2050)						
Mobile Source	158	165	1,525	5	444	114
Area Source	297	54	466	<1	4	4
Energy Source	2	34	17	<1	3	3
TOTAL	458	253	2,008	5	451	121
Proposed HEU Land Use and Zoning Designations (2050)						
Mobile Source	130	136	1,256	4	366	9
Area Source	308	73	529	<1	6	6
Energy Source	2	39	18	<1	3	3
TOTAL	441	247	1,803	4	375	103
Change (HEU – Adopted Land Use)	*-17*	*-6*	*-205*	*-1*	*-77*	*-18*
WINTER						
Adopted Land Use and Zoning Designations (2050)						
Mobile Source	137	182	1,057	4	444	114
Area Source	250	50	21	<1	4	4

Source	Pollutant (pounds per day)					
	ROG	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Energy Source	2	34	17	<1	3	3
TOTAL	389	266	1,094	5	451	121
Proposed HEU Land Use and Zoning Designations (2050)						
Mobile Source	113	150	870	3	366	94
Area Source	261	68	29	<1	6	6
Energy Source	2	39	18	<1	3	3
TOTAL	376	257	917	4	375	103
Change (HEU – Adopted Land Use)	*-13*	*-9*	*-178*	*-1*	*-77*	*-18*
SOURCE: Appendix C, Attachments 1 and 2.						

As shown in Table 4.2-5, buildout of the proposed project would result in an overall decrease in emissions when compared to the existing zoning and land use designations (Appendix C).

Although project buildout would result in an increase in residential development in the City, the project would not conflict with implementation of the ICAPCD air quality plans because buildout of the project would not exceed the emissions assumptions used to develop the plans. Therefore, impacts would be less than significant.

4.2.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.2.5.3 Significance After Mitigation

Impacts to applicable air quality plans would be **less than significant**.

4.2.6 Issue 2: Cumulative Net Increases of Criteria Pollutants

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

4.2.6.1 Impact Analysis

The SSAB is in non-attainment areas for NAAQS and CAAQS for ozone, PM10, and PM2.5. The majority of regional PM10 and PM2.5 emissions originate from dust stirred up by wind or by vehicle traffic on unpaved roads (ICAPCD 2009). Other PM10 and PM2.5 emissions originate from grinding operations, combustion sources such as motor vehicles, power plants, wood burning, forest fires, agricultural burning, and industrial processes. NOX and ROG react in the presence of sunlight to produce ozone. Approximately 88 percent of NOX

and 40 percent of ROG regional emissions originate from on- and off-road vehicles (ICAPCD 2010). Other major sources include solvent evaporation and miscellaneous processes such as pesticide application.

Operational

Long-term emissions of regional air pollutants occur from operational sources. As further discussed in Appendix C, operation of Site 3, Site 18, and the Bowker Site would result in emissions that would be less than the applicable thresholds for all criteria pollutants (Appendix C Tables 10, 12, and 14). These are the largest development sites; therefore, emissions associated with operation of all other Discretionary Development Sites and By-Right Development Sites would also be less than the applicable thresholds. Additionally, as shown in Table 4.2-5, buildout of the proposed project would result in an overall decrease in emissions when compared to the existing zoning and land use designations (Appendix C). Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

Construction

As further detailed in Appendix C, construction-related emissions were calculated for development of Site 3, which proposes the greatest number of units and trips; construction and operation of Site 18, which proposes the greatest number of units and trips of all the By-Right Development Sites; and construction and operation of the Bowker Site (Site 24b). Construction of Site 3 and Site 18 would result in PM_{10} emissions that exceed the applicable threshold (Appendix C Table 9 and 11). All other emissions would be below the applicable thresholds. The exceedance is due to construction worker vehicles and deliveries traveling over unpaved roads. The ICAPCD requires that all feasible standard measures for fugitive PM_{10} must be implemented at all construction sites, and all feasible discretionary measures for PM_{10} must be implemented at construction sites that are 5 acres or more for non-residential developments or 10 acres or more in size for residential developments. Additionally, the ICAPCD requires that all feasible standard measures for construction equipment must be implemented at construction sites. Site 3 is a Discretionary Development Site, and no specific development is proposed at this time. Any future project would require subsequent environmental review prior to approval, and a dust mitigation plan would be required demonstrating that the project would reduce emissions of PM_{10}. A dust control plan that describes all fugitive dust control measures would be prepared for all Discretionary Development Sites as required by ICAPCD Rule 801 (see Appendix C). However, because construction emissions would remain above the threshold for PM_{10} and the level of fugitive PM_{10} reduction cannot be known at this time, construction-related impacts at Discretionary and By-Right Development Sites would be significant and mitigation would be required.

Construction of the Bowker Site (Site 24b) would result in ROG and PM_{10} emissions that exceed the applicable threshold (Appendix C Table 13). All other emissions would be below the applicable thresholds. ROG emissions are due to architectural coatings (e.g., paints) used during the final stages of construction, and PM_{10} emissions are largely due to construction worker vehicles and deliveries traveling over unpaved roads. The Bowker Site is a Discretionary Development Site, and no specific development is proposed at this time. Any future development project would require subsequent environmental review prior to approval, and ROG and PM_{10} mitigation measures would be required at that time. Construction-related impacts associated with the Bowker Site would be significant, and mitigation would be required.

4.2.6.2 Mitigation Framework

For all Discretionary and By-Right Development Sites, construction emissions would be potentially significant and the following mitigation measures would be required:

MM AQ-1: Fugitive Dust Control: For Discretionary Development, prior to commencing construction, the project applicant shall be required to submit an Enhanced Dust Control Plan to the Imperial County Air Pollution Control District (ICAPCD) for approval. The Enhanced Dust Control Plan shall identify all sources of particulate matter less than 10 microns (PM_{10}) emissions and associated mitigation measures during construction (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Enhanced Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20 percent opacity performance standard for dust control and address the following parameters as stipulated in ICAPCD Regulation VIII – Fugitive Dust Control Measures:

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

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

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

suppressants, and/or watering. The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at the delivery site after the removal of bulk material.

d) The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at the delivery site after the removal of bulk material.

e) All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

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

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

In order to provide a greater degree of PM_{10} reductions, above that required by Regulation VIII, the ICAPCD recommends the following discretionary measures for fugitive PM_{10} control:

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

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

c) Install an automatic sprinkler system on all soil piles.

d) Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.

e) Develop a trip reduction plan to achieve a 1.5 average vehicle ridership for construction employees.

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

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM AQ-2: Construction Combustion Equipment: For discretionary development, prior to commencing construction, the project applicant shall be required to submit a Construction Combustion Equipment Plan to the Imperial County Air Pollution Control District (ICAPCD) for approval. The ICAPCD requires that, regardless of the size of a project, all feasible standard measures for construction equipment must be implemented at construction sites. Standard measures from the ICAPCD handbook include the following:

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

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

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

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

To help provide a greater degree of reduction of particulate matter emissions from construction combustion equipment, the ICAPCD recommends the following enhanced measures:

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

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

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

MM AQ-3: Low/No Volatile Organic Compound Architectural Coatings: For Discretionary Development, prior to commencing construction, for projects that would result in reactive organic gas (ROG) emissions that exceed the applicable threshold, the project applicant shall be required to submit an ROG Reduction Plan to the City of Calexico for approval. It shall identify the maximum allowable volatile organic compound content limits (in grams per liter) for all required architectural coatings, as defined in ICAPCD Rule 424, necessary to result in total ROG emissions that are less than 137 pound per day.

4.2.6.3 Significance After Mitigation

For Discretionary Development Sites, implementation of **MM-AQ-1** through **MM-AQ-3** would occur during subsequent environmental CEQA review prior to approval. For By-Right Development Sites, applicable requirements consistent with the protections established in **MM-AQ-1** through **MM-AQ-3** would be incorporated and implemented through the City's ministerial review process for by-right housing sites, as established pursuant to Program 2E in the HEU. With implementation of mitigation measure **MM-AQ-3,** architectural coating impacts would reduce to a level less than significant. Additionally, implementation of measures **MM-AQ-1** and **MM-AQ-2**, construction-related emissions associated with future Discretionary and By-Right Development Sites would be reduced. However, because the level of fugitive PM_{10} reduction cannot be known at this time, construction-related impacts at Discretionary and By-Right Development Sites would remain **significant and unavoidable**.

4.2.7 Issue 3: Sensitive Receptors

Would the project expose sensitive receptors to substantial pollutant concentrations?

4.2.7.1 Impact Analysis

Air quality regulators typically define sensitive receptors as schools (preschool–12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Residential uses can also be considered sensitive receptors. Sensitive receptors are located throughout the City. The Calexico Unified School District includes schools within the City. The El Centro Regional Medical Center and Calexico Health Center are located adjacent to State Route 98 (SR-98) east of State Route 111 (SR 111). The two primary emissions of concern regarding health effects are CO and TACs, including DPM.

Local Carbon Monoxide Hotspots

Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, the introduction of cleaner fuels, and the

implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SSAB is now designated as attainment. All air basins are attainment or maintenance areas for CO.

If all the following screening criteria are met, operation of a project would result in a less than significant impact related to CO:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The SSAB have the same federal and State CO attainment designations, and therefore experience similar CO concentrations; thus, these screening volumes are appropriate for evaluating CO impacts in the SSAB. Based on existing and buildout intersection turning volumes provided in the Transportation Study, volumes are projected to be substantially less than the screening criteria of 44,000 vehicles per hour. The busiest intersection is located at SR-111 and SR-98 and has a projected peak hour turning volume of 4,528 vehicles per hour (RICK 2026). Thus, based on CEQA screening criteria, the project would not result in CO hot spots.

Toxic Air Emissions

Construction

Construction of future development and redevelopment under the proposed project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from project sites. Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (2015), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Therefore, if the duration of proposed construction activities near any specific sensitive receptor were a year,

the exposure would be three percent of the total exposure period used for health risk calculation.

Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and at various locations over the lifetime of project buildout, DPM generated by construction is not expected to create conditions where the probability is greater than 10 in 1 million of developing cancer for the Maximally Exposed Individual, or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new, low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced over the years as project buildout continues. Additionally, construction of future site-specific projects would adhere to the requirements of California Code of Regulations, Title 13, Section 2449, to reduce nonessential idling, and the construction requirements of ICAPCD rules and regulations. Further, future construction activities would be required to comply with all applicable CARB off-road equipment regulations in effect at the time that construction activities are proposed. Therefore, the project would not expose sensitive receptors to toxic air emissions during construction of future development at the housing sites, and impacts would be less than significant.

Stationary Sources

The proposed project would not result in the construction and operation of a stationary source of TACs. Various uses, such as dry cleaners and gasoline-dispensing facilities, have the potential to be substantial stationary sources that would require a permit from the ICAPCD.

There are no large-scale distribution centers, rail yards, ports, or refineries within the City. Although future development and redevelopment under the project could be located near existing types of dry cleaning and gasoline facilities, emissions of TACs are regulated by ICAPCD through permitting and monitoring requirements. The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with AB 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility would be required to submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. The ICAPCD prepares annual reports in accordance with these requirements. Additionally, as discussed in Section 4.2.2.3, Regional, pursuant to ICAPCD Rule 207 (New & Modified Stationary Source Review) and associated rules such as Rule 201 (Permits Required) and Rule 208 (Permit to Operate),

the construction, installation, modification, replacement, and operation of any equipment which may emit air contaminants requires ICAPCD permits. The ICAPCD requires that all such equipment be assessed for the potential to result in health risk impacts, and permits to operate equipment must be renewed each year equipment is in use or upon the modification of equipment. Therefore, adherence with these regulations would ensure that future development and redevelopment would not expose sensitive receptors to TACs associated with stationary sources within the City.

Mobile Sources

As discussed in Section 4.2.2, Regulatory Framework, CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or an urban road with 100,000 or more vehicles per day should be avoided when possible. SR-98 and SR-111 are the most heavily traveled roadways within the City. Based on Caltrans traffic counts (Caltrans 2024) and intersection turning volumes provided in the Transportation Study (RICK 2026), these roadways are not projected to carry more than 100,000 vehicles per day. CARB notes that these recommendations are advisory and should not be interpreted as defined "buffer zones," and that local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk, where necessary, CARB's position is that infill development; mixed-use, higher-density, transit-oriented development; and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. Additionally, the 2025 California Building Code–Title 24 requires that all new residential uses include improved air filtration systems. Filters are categorized according to minimum efficiency reporting value (MERV) rating. The higher the MERV rating, the better the filtration. MERV-13 filters are effective at filtering DPM. Given the roadway volumes within the City and the requirements for improved air filtration systems, the project would not expose sensitive receptors to TACs associated with mobile sources. Impacts would be less than significant.

4.2.7.2 Mitigation Framework

Impacts would remain less than significant. No mitigation is required.

4.2.7.3 Significance After Mitigation

Impacts to sensitive receptors from substantial pollutant concentrations would remain **less than significant.**

4.2.8 Issue 4: Odors

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

4.2.8.1 Impact Analysis

In the context of land use planning, one of the most important factors influencing the potential for an odor impact to occur is the distance between the odor source and receptors. The City considers prudent land use planning as the key mechanism to avoid odor impacts. The greater the distance between an odor source and receptor, the less concentrated the odor emission would be when it reaches the receptor. Odors can be generated from a variety of source types, including both construction and operational activities. Although less common, construction activities that include the operation of a substantial number of diesel-fueled construction equipment and heavy-duty trucks can generate odors from diesel exhaust emissions. A project's operations, depending on the project type, can generate a large range of odors that can be considered offensive to receptors. Examples of common land use types that typically generate significant odor impacts include, but are not limited to, the following:

- Wastewater treatment plants
- Sanitary landfills
- Composting/green waste facilities
- Recycling facilities
- Petroleum refineries
- Chemical manufacturing plants
- Painting/Coating operations
- Rendering plants
- Food packaging plants

When land uses such as these or other odor-generating land uses are sited proximate to sensitive receptors, odor impacts may occur and further analysis of the nature of the odor source, the prevailing wind patterns, the number of potentially effected receivers, and other considerations would be warranted.

Emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach a receptor (e.g., people in residential units, day care centers, schools, nursing homes), they would be diluted to well below any level of air quality concern. Therefore, construction would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Once operational, future development implemented under the project would include residential uses that are generally not a source of objectionable odors. Therefore, project operation would not result in odors affecting a substantial number of people, and impacts would be less than significant.

Existing sources of odor within the City primarily stem from the polluted New River. The State of California's Clean Water Act lists the New River as impaired by numerous constituents and is a State priority for cleanup purposes. The New River runs north from Mexico and is threatened by discharges of waste and storm water runoff from domestic, agricultural, and industrial sources. A New River Improvement Project Strategic Plan was developed to address sources of pollution. Additionally, a New River Improvement Project has been approved that would install infrastructure improvements to reduce pollution and odors associated with the New River. One of the key objectives of the New River Improvement Project is to eliminate the offensive odors being emitted and impacting the residents of the City. Accordingly, implementation of the State's ongoing cleanup efforts and the approved New River Improvement Project is expected to substantially reduce objectionable odors associated with the New River.

4.2.8.2 Mitigation Framework

Implementation of the proposed project would facilitate future residential development throughout the City, including on sites located in proximity to the New River. While this could result in additional sensitive receptors being located near an existing source of odor, the project would not generate new odor sources or intensify existing odor-generating activities. Furthermore, implementation of the approved New River Improvement Project is expected to substantially reduce odor emissions from the New River over time. Therefore, implementation of the project would not expose a substantial number of people to objectionable odors, and odor impacts would be less than significant. No mitigation is required.

4.2.8.3 Significance After Mitigation

Impacts to other emissions (such as those leading to odors) affecting a substantial number of people would remain **less than significant.**

4.4 Cultural Resources and Tribal Cultural Resources

This section analyzes potential impacts to cultural and tribal resources that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). Information presented in this section was obtained from a Cultural Resources Report prepared by RECON in June 2026, which included a records search of the housing sites. This report is included as Appendix E. The report includes a search of a review of all relevant site records and reports on file at the South Coast Information Center (SCIC) and sending a letter to the Native American Heritage Commission (NAHC) in April 2026. Other secondary source documentation includes review of the City's General Plan (2007), review of historic aerial photographs, and tribal consultations.

4.4.1 Existing Conditions

4.4.1.1 Cultural Setting

Historic Periods

Prehistoric

The earliest known human occupation of the project area dates to approximately 10,000 years ago and is associated with the San Dieguito Culture, marking the beginning of the Archaic Period (8,000 to 6,000 B.C.E.). This culture is characterized by large stone projectile points, scrapers, choppers, bone awls, and other stone tools. During the Middle Archaic Period, Native American groups increasingly relied on hard seed resources, as reflected by the widespread use of manos and metates that define the Encinitas Tradition. By the Late Prehistoric Period (500 to 1774 A.D.), larger, more permanent settlements had developed, accompanied by advances in artistic and ceremonial practices. During this time, the Cuyamaca Culture Complex emerged in inland Imperial County, distinguished by unique burial customs, ceramics, and mortuary goods, and is believed to represent the ancestors of the Indigenous peoples encountered by early Europeans.

According to the Imperial County General Plan, approximately 7,000 prehistoric archaeological sites have been recorded throughout the county. A Cultural Resources Sensitivity Map prepared for the County General Plan EIR identifies the New River as the nearest known cultural resource to the City of Calexico, with the entire river corridor considered highly sensitive for archaeological resources due to its importance to prehistoric populations (City of Calexico, 2007b).

Historic

The City of Calexico and surrounding Imperial Valley contain a variety of historic-period cultural resources associated with early exploration, transportation, irrigation, agriculture, and settlement. The region played an important role in the development of overland travel routes connecting present-day Mexico with coastal California during the Spanish, Mexican, and American periods. Historic transportation corridors, including the Juan Bautista de Anza National Historic Trail and the Southern Immigrant Trail, pass through or near the project area and are recognized for their historical significance. Although few physical remnants remain along portions of these routes, the trails themselves are considered important cultural resources, with several historical markers and designated landmarks commemorating their role in California's early settlement and transportation history.

The transformation of the Imperial Valley through large-scale irrigation projects in the late 19th and early 20th centuries also contributed substantially to the region's historic character. Construction of the All-American Canal, completed in 1940, enabled widespread agricultural development and remains one of the most significant historic engineering features in Imperial County. The canal traverses the City of Calexico and is a recorded historic water conveyance system. Additional canals, water control structures, and associated irrigation infrastructure dating to the early 20th century are also present throughout the city and may qualify as historic resources due to their association with the development of the Imperial Irrigation District and the expansion of agriculture in the Imperial Valley.

Collectively, historic transportation routes, irrigation systems, agricultural infrastructure, and associated buildings represent the primary historic-period cultural resources that may occur within and around the City of Calexico and provide the context for evaluating potential impacts to historical resources.

4.4.1.2 Existing Resources

Cultural resources in the City of Calexico include prehistoric and historic archaeological sites, buildings, structures, landscapes, objects, and places that possess historical, archaeological, scientific, architectural, cultural, or traditional significance. Prehistoric resources may include habitation sites, temporary camps, lithic and ceramic scatters, quarries, and trails. Historic archaeological resources commonly consist of artifact scatters, refuse deposits, and structural remains, while historic built resources include residences, commercial buildings, bridges, irrigation features, and other structures.

Historic resources have the potential to occur throughout the city, particularly within older neighborhoods where buildings 50 years of age or older may qualify as historical resources if they retain sufficient integrity. Undeveloped and minimally disturbed parcels generally

have the greatest potential to contain previously unidentified archaeological resources, whereas previously excavated or heavily disturbed areas are less likely to contain intact deposits, although buried resources may still be present.

Approximately 200 historic sites have been recorded in Imperial County. Few sites remain from the American Period, since little settlement occurred until the availability of irrigation water in 1901. Any remaining sites have probably been impacted by agricultural activities and the construction of towns. According to the City of Calexico General Plan EIR, the only area of sensitivity for cultural resources is within the one-mile buffer surrounding the New River in the southeast portion of the City. Additionally, the Old City Hall, Old Public Library (Carnegie Library) and Women's Improvement Club buildings could all be potentially listed as Historic Resources (City of Calexico, 2007b).

Cultural Records Search Results

The South Coastal Information Center records search indicated that there have been 66 cultural resources investigations conducted within the 0.25-mile search radius of the housing sites, 28 of which intersect with the housing sites. The records search results also indicate 21 cultural resources recorded within the 0.25-mile search area, as shown in Table 4.4-1: Previously Recorded Cultural Resources Within 0.25 Miles of Project Area. These resources include 20 historic-era sites and 1 historic isolated artifact; no prehistoric sites are recorded within the search areas. The historic-era sites consist of an ancillary building, canals, water conveyance features, a fence line, military telegraph lines, a ranch complex, a road, trash scatters, and single-family properties. The historic isolate consists of a glass bottle fragment and a butchered bone fragment. Four historic addresses occur within the search areas, two of which occur on By-Right Development Sites 30 and 53. The built environment resource directory maintained by the Office of Historic Preservation lists five historic resources including the Central Main Canal, Dogwood Canal, De Anza Hotel, a bridge, and Camp Salvation. Of these resources, seven resources intersect or are within the project areas.

Table 4.4-1: Previously Recorded Cultural Resources Within 0.25 Miles of Project Area

Primary #	Trinomial #	Period	Site Type	Recording Events	Note
P-13-003311	CA-IMP-003311	Historic	Military telegraph line	1978 (Joe Vogel)	
P-13-003319	CA-IMP-003319	Historic	Road	1978 (Joe Vogel)	
P-13-003499	CA-IMP-003499	Historic	Military telegraph line	1978 (Joe Vogel)	
P-13-007130	**CA-IMP-007130**	**Historic**	**Canal**	**1994 (E. Huber et al., Statistical Research Inc.); 1996 (Brad Strum, Ivan Strudwick, LSA Associates, Inc.); 1997 (G. Edward Collins, Imperial Irrigation District); 1999 (Barry G. Scott, Jones & Stokes Associates); 2000 (C. Dolan, KEA Environmental, Inc.); 2001 (Collin O'Neill, ASM Affiliates); 2005 (A. York, K. Norwood, J. White, EDAW, Inc.); 2006 (Jesse Belfasy, Michael Baker Corp.); 2010 (K. Tennesen, J. Whitaker, HDR); 2011 (Jennifer Krintz, ASM Affiliates, Inc.); 2011 (Pamela Daly, Daly & Associates); 2015 (Channon Carmack, Rincon Consultants); 2017 (Christopher E. Rayle, Steve Swanson, Environmental Planning Group, LLC); 2017 (M. DeCarlos, S. Lewis, Dudek); 2018 (HDR, Inc.)**	**All-American Canal4/16/2026 Is a district with element 13-008333; See also 13-007667**

P-13-008469		Historic	Single-family property	2001 (CRM Tech)	
P-13-008470		Historic	Single-family property	2001 (CRM Tech)	
P-13-008682	CA-IMP-008166	Historic	Railroad	2003 (Karen Collins, J. Michael Pflaum, IVC Museum); 2005 (Andrea C. Craft, Michael J. Wise); 2011 (C. Ehringer, ESA)	Southern Pacific Railroad (Imperial and Gulf Branch); Niland to Calexico Railroad
P-13-008879	CA-IMP-008299	Historic	Trash scatter	2004 (SWCA Environmental Consultants)	All-American Canal
P-13-008880	CA-IMP-008300	Historic	Trash scatter	2004 (SWCA Environmental Consultants)	
P-13-008881		Historic	Isolate: glass bottle fragment; butchered bone	2004 (SWCA Environmental Consultants)	
P-13-008911		**Historic**	**Single-family property**	**2007 (Harris Arch Cons.)**	
P-13-008912		**Historic**	**Ancillary building**	**2005 (N. Harris, Harris Arch Cons.)**	
P-13-008913		Historic	Water conveyance	2005 (N. Harris, Harris Arch Cons)	
P-13-008914		Historic	Water conveyance	2005 (N. Harris, Harris Arch Cons.)	
P-13-008915		Historic	Fence	2005 (N. Harris, Harris Arch Cons.)	
P-13-011937		Historic	Ranch complex	2010 (ASM Affiliates)	Gunterman Ranch
P-13-012242		**Historic**	**Canal**	**2010 (HDR/e2m)**	**Briar Canal**

P-13-012243		**Historic**	**Canal**	**2010 (HDR/e2m)**	**Central Main Canal**
P-13-012743		Historic	Water conveyance	2010 (Laguna Mountain Environmental, Inc.)	
P-13-012895		**Historic**	**Canal**	**2010 (HDR e2M)**	
P-13-012896		**Historic**	**Canal**	**2010 (HDR e2M)**	
Bold is adjacent to or within project areas					

Prehistoric Resources

No prehistoric resources were observed in the project area.

Historic Resources

The following intersect or are located within the project areas:

- All-American Canal (P-13-007130): The resource is adjacent to Discretionary Sites 26, 29, and 30, and By-Right Sites 25, 27 and 50. The construction of the All-American Canal between 1934 and 1940 transformed agricultural development and settlement of the Imperial and Coachella valleys because of the canal's capacity to transport water from the Colorado River to Imperial Valley. The complete canal totals 80 miles. The canal was determined eligible under Criteria A and C of the National Register of Historic Properties in 2001 by the Bureau of Reclamation and California State Historic Preservation Officer (HDR 2018).
- Briar Canal (P-13-012242): This resource is located within Discretionary Site 24. This resource is a concrete lined earthen waterway that is 2.5 miles long and located adjacent to the Central Main Canal at the Cole Boulevard/Bowker Road intersection. The 1957 Calexico USGS map exhibits the canal. The canal does not appear to be a major component of the overall Imperial Irrigation District (IID) system, and therefore does not appear to be a significant contributing element of the IID System (HDR, 2010a).
- Central Main Canal (P-13-012243): This resource is located within Discretionary Site 24. This resource is an earthen waterway with no formal lining and extends 26 miles north past El Centro into Brawley. It is mapped on the 1940 Calexico USGS map. The canal has been recommended as a significant contributing element to the IID system since it is one of the main branches of the All-American Canal (P-13-007130), which is eligible under Criteria A for its association with the economic, agricultural, and social growth of the Imperial Valley in the early to mid-twentieth century (HDR 2010b).
- Unnamed Drain (P-13-012895): This resource is located within the Bowker Rezone Site 24b. This resource is a concrete-lined drain on the southeast side of Highway 98 that directs water underneath the highway, ending in a rounded collection chamber on the northwest side of the highway. The length is unknown. It is not present on the 1957 Calexico USGS map. The drain has not been evaluated for significance under CEQA criteria (HDR, 2010c).
- Unnamed Drain (P-13-012896): This resource is located within Discretionary Site 30. This resource is a concrete-lined irrigation drain on the northwest side of Highway 98, south of the All-American Canal. The length is unknown. It is not present on the 1957 Calexico USGS map. The drain has not been evaluated for significance under CEQA criteria (HDR, 2010d).

- Single-family property (P-13-008911): This resource is located within By-Right Site 53. This resource is a single-story, craftsman-style house built in 1935 that was abandoned at the time of recording. The house was recommended not eligible for the California Register of Historical Resources. The house is present in a 2005 aerial photograph; however, the house is not present on a 2009 aerial photograph and is presumed to have been demolished (Walter Enterprises 2007).
- Ancillary building (P-13-08912): This resource is located within By-Right Site 50. This resource is a small ancillary building associated with the single-story house (P-13-008911). The structure was likely a shelter for chickens or pigs. The structure is present in a 2005 aerial photograph; however, it is not present on a 2009 aerial photograph and is presumed to have been demolished (Harris Archaeological Consultants, 2005).

Historic Aerial Photograph Review for By-Right Sites

RECON reviewed historic aerial photographs and topographic maps for the 39 by-right sites. The earliest photograph available online at Nationwide Environmental Title Research LLC dates to 1953. Aerial photographs from 1959, 1965, 1985, 1996, 2002, 2005, 2009, 2010, 2012, 2014, 2016, 2019, 2020, 2022, and 2024 were analyzed. Topographic maps from 1945, 1957, 1958, 1961, 1974, 1976, 1977, 1981, and 2012 were also reviewed.

Most of the By-Right Sites are currently vacant and have been used as agricultural fields in the past, but some sites with buildings or structures were identified in aerial photographs and/or topographic maps, as shown in Table 4.4-2: Existing Conditions of By-Right Sites. Sites 44 and 45 are being used as storage yards; site 7 contains a burned house; site 23 possesses a house that may be over 50 years old; and site 36 possesses a house that is over 50 years old. Topographic maps of five (5) sites include buildings or structures currently or in the past. A 1957 topographic map of site 17 depicts two buildings, and a third building is added by the 1958 topographic map. All three are on the 1961 and 1976 maps. At site 23, two (2) buildings are shown on 1957, 1958, 1961, and 1976 topographic maps. No buildings are noted on topographic maps for site 36 despite aerial photographs exhibiting a house that is over 50 years old. The buildings on sites 50 and 53 appear on topographic maps from 1945, 1956, 1958, 1961, 1974, 1977, and 1981 (Appendix E).

Table 4.4-2: Existing Conditions of By-Right Sites

ID	APN	Address/Cross Street	Vacant	Aerial Photographs*	Topographic Maps*	Mitigation
4	059010019	Scaroni Rd.	Yes	Canal Strout Drain 2, Central Main Canal, 1953–1984 agricultural fields, vacant post 1986	n/a	n/a
5	059010020	Robinson Blvd.	Yes	1953–1984 agricultural fields, vacant post 1986	n/a	n/a
6	059010048	Robinson Blvd.	Yes	1953–1965 agricultural fields, 1985–2024 vacant	n/a	n/a
7	059342030	615 Scaroni Rd.	No	1953-1965 agricultural fields, 1996 building, 2022 building appears burnt	Building not shown on maps	n/a
8	059342033	2402 Van De Graaf Ave.	Yes	1953–1985 agricultural fields, 1996–2024 vacant	n/a	n/a
9	059010032	Cole Blvd.	Yes	1953-2005 agricultural fields, 2009-2022 vacant, 2024 grubbed	n/a	n/a
10	059010030	Cole Blvd.	Yes	1953-2005 agricultural fields, 2009-2022 vacant	n/a	n/a
11	059491003	Spud Moreno St.	Yes	1953-2005 agricultural fields, post 2009 vacant	n/a	n/a
12	059500003	Spud Moreno St.	Yes	Canal Strout Drain 2, Central Main Canal, 1953–2005 agricultural fields; post 2009 vacant	n/a	n/a
13	059491004	Cole Blvd.	Yes	1953-2005 agricultural fields, 2009-2022 vacant, 2024 grubbed	n/a	n/a
14	059496059	Cole Blvd.	Yes	1953-2002 agricultural fields,	n/a	n/a

				2005 some grading, 2024 grubbed		
15	059010057	Jasper Rd.	Yes	1953-2024 agricultural fields	n/a	n/a
16	059010058A	Jasper Rd.	Yes	1953-2024 agricultural fields	n/a	n/a
17	059010058B	Jasper Rd.	Yes	1953-2024 agricultural field, 1953 three structures, 2009 structures demolished	1957 exhibit two buildings, 1958–1976 exhibit three buildings	n/a
18	59010059	Jasper Rd.	Yes	1953–present agricultural fields	n/a	n/a
19	059471040	Cole Blvd.	Yes	1953–1996 agricultural field, 2002 possible staging yard for housing development, vacant post 2002	n/a	n/a
20	059471041	Cole Blvd.	Yes	1953–1996 agricultural field, 2002 possible staging yard for housing development, vacant post 2002	n/a	n/a
21	059471042	Cole Blvd.	Yes	1953–1996 agricultural field, 2002 possible staging yard for housing development, vacant post 2002	n/a	n/a
22	059455042	Cole Blvd.	Yes	1953–2022 agricultural field, 2005 vacant, 2009 development east	n/a	n/a
23	059180034	570 Bowker Rd.	No	1953 two houses, 1965 one house demolished, 1985 structure in the southwest (existing), 1996 house two demolished; 2002–2024 1985 structure	1957–1976 exhibit two structures	If the house is more than 50 years old, it should be evaluated for inclusion in the California

						Register of Historical Resources; construction monitoring recommended
25	059180045	Highway 98	No	1953–2024 agricultural field	n/a	n/a
26	059180044A	Highway 98	No	1953–2024 agricultural field	n/a	n/a
27	059180044B	Highway 98	No	1953–2024 agricultural field	n/a	n/a
28	059441003	Sapphire St.	Yes	1953–2019 agricultural field, vacant post 2019	n/a	n/a
29	059441004	Sapphire St.	Yes	1953-1996 agriculural field, 2002 partially graded, 2005-2009 agricultural field, Post 2010 vacant	n/a	n/a
30	059441005	Highway 98	Yes	1953-2009 agricultural field, Post 2010 vacant	n/a	n/a
31	059240040	Highway 98	No	1953–1985 agricultural field, public facility post 1996	n/a	n/a
32	059240048	Highway 98	Yes	1953–1985 agricultural field, 1996 vacant & development to east	n/a	n/a
33	059240050	Highway 98	Yes	1953–1985 agricultural field, 1996 vacant & development to east	n/a	n/a
34	058791005	1071 E Birch Ave	Yes	1953–1985 agricultural field, 1996 vacant with building to southwest, 2002 building southeast	n/a	n/a
35	058264002	1037 Rockwood Ave	Yes	1953 vacant, 1959 building, building present through 2022, 2024 building demolished	n/a	n/a

36	058294001	915 Ollie Ave.	No	1953 vacant in south, structure in north (1959–2024), 1959–2024 building in south	Building not shown on maps	Evaluate both buildings; construction monitoring recommended
37	058400058	Pierce Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
38	058400057	Pierce Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
39	05840056	Pierce Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
40	05840055	Pierce Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
41	05840054	Sherman Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a

42	05840053	Sherman Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
43	058400052	Sherman Ct.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
44	058400051	Sherman Ct.	No	1953–1984 agricultural field, 1984 first building east, then start as parking lot/storage area, no buildings	n/a	n/a
45	05840065	Sherman Ct.	No	1953–1984 agricultural field, 1984 first building east, then start as parking lot/storage area, no buildings	n/a	n/a
46	058223020	Grant St.	Yes	1953–1965 agricultural field, 1984 vacant, 1996 cul de sac, 2002 paved cul de sac, vacant to present	n/a	n/a
47	058233027	Grant St.	Yes	1953-2024 vacant	n/a	n/a
48	058853001	De Las Flores St.	Yes	1953 apiaries or nursery, 1984 agricultural fields, 1996 vacant, 2005 enclosed fenced area, 2012 storage containers in fenced area	n/a	n/a
49	058853002	De Las Flores St.	Yes	1953 apiaries or nursery, building, 1984 agricultural fields, 1996 vacant & building demolished	n/a	n/a

50	058180090	Highway 98	Yes	1953–2005 structure, 2009 structure demolished; 1953–1965 orchard, 1965–2024 vacant field	1945–1981 exhibit one building	n/a
51	058180091	Highway 98	Yes	1953–1965 orchard, 1984 agricultural fields, 1996 vacant	n/a	n/a
52	58180092	Highway 98	Yes	1953–1965 orchard, 1984 agricultural fields, 1996 vacant	n/a	n/a
53	58180093	Highway 98	Yes	1953–2005 house, 2009 house demolished, 2009–2024 vacant	1945–1981 exhibit one building	n/a

*Aerial photographs from 1959, 1965, 1985, 1996, 2002, 2005, 2009, 2010, 2012, 2014, 2016, 2019, 2020, 2022, and 2024, and topographic maps from 1945, 1957, 1958, 1961, 1974, 1976, 1977, 1981, and 2012 (Nationwide Environmental Title Research, LLC 2026).

Tribal Cultural Resources

A response letter from the Native American Heritage Commission (NAHC) was received on April 14, 2026 indicating positive results for their search of the Sacred Lands File for the proposed project area (Appendix E). The NAHC recommended that the City contact the Ewiiaapaayp Band of Kumeyaay Indians and the Torres-Martinez Desert Cahuilla Indians. The NAHC also provided a list of other sources of cultural resources to contact for information regarding known and recorded sites (see Appendix E).

Based on the NAHC response, a tribal cultural resource is known in the vicinity of the housing sites. Tribal cultural resources may include sacred lands, burial grounds, archaeological sites, and other areas of cultural significance. Pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18, on July 23, 2026, the City notified California Native American tribes identified by the NAHC or included on the City's list of tribes seeking notice of projects subject to CEQA review. The City received 0 requests for consultations regarding the project's potential impacts on cultural resources.

4.4.2 Regulatory Framework

4.4.2.1 Federal

National Register of Historic Places

The National Register of Historic Places (NRHP), established under the National Historic Preservation Act of 1966, is the nation's official list of districts, sites, buildings, structures, and objects considered significant in American history, architecture, archaeology, engineering, or culture. Properties may be eligible for listing if they retain sufficient integrity and meet one or more of the NRHP significance criteria. Federal agencies are required to consider the effects of federally funded, licensed, or permitted undertakings on properties listed in or eligible for the NRHP pursuant to Section 106 of the National Historic Preservation Act.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources located on federal and Native American lands. ARPA regulates excavation and removal of archaeological resources through a federal permitting process and establishes penalties for unauthorized disturbance or removal.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) establishes procedures for the treatment, protection, and repatriation of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony discovered or curated on federal or tribal lands.

4.4.2.2 State

California Register of Historic Resources

The California Register of Historical Resources (CRHR) identifies resources that are historically or archaeologically significant at the local, state, or national level. A resource may be eligible for listing if it retains sufficient integrity and meets one or more of the criteria established under Section 5024.1 of the California Public Resources Code. Historical resources listed in or determined eligible for the CRHR are afforded consideration under CEQA.

California Public Resource Code – Section 21083

The California Public Resources Code provides additional protections for archaeological resources. Section 21083.2 establishes procedures for evaluating impacts to unique archaeological resources and identifies preservation in place as the preferred method of mitigation whenever feasible. Sections 5097.5 and 30244 prohibit unauthorized disturbance or removal of archaeological and paleontological resources located on public lands except under permit.

California Health and Safety Code

California Health and Safety Code Section 7050.5 establishes procedures that must be followed when human remains are encountered during ground-disturbing activities. Work in the vicinity of the discovery must cease until the county coroner determines whether the remains are of forensic interest. If the remains are determined to be Native American, the coroner notifies the Native American Heritage Commission, which designates a Most Likely Descendant to recommend appropriate treatment and disposition of the remains pursuant to Public Resources Code Section 5097.98.

Assembly Bill (AB) 52

Assembly Bill 52 (AB 52), codified in the Public Resources Code, established a formal consultation process between California Native American tribes and lead agencies for projects subject to CEQA. The law requires consultation with traditionally and culturally affiliated tribes that request notification and provides for consideration of tribal cultural resources during environmental review.

Senate Bill (SB) 18

Senate Bill (SB 18) requires California local governments to consult with Native American tribes before adopting or amending General Plans or Specific Plans to protect traditional tribal cultural places and sacred sites. It provides tribes an opportunity to participate in land-use decisions and ensures that tribal cultural values are considered early in the development planning phase.

Mills Act Program

The Mills Act allows local governments to enter into contracts with owners of qualified historic properties to encourage preservation through reduced property taxes. In exchange, property owners agree to maintain and preserve the historic character of their properties. Participation in the program is voluntary and administered by local jurisdictions.

4.4.2.3 Native American Involvement

The Native American Heritage Commission (NAHC) serves as the primary state agency responsible for protecting Native American cultural resources. The NAHC maintains the Sacred Lands File, assists lead agencies in identifying California Native American tribes with cultural affiliations to project areas, and facilitates consultation under AB 52. During CEQA review, consultation with traditionally and culturally affiliated tribes provides an opportunity to identify tribal cultural resources, evaluate potential impacts, and develop appropriate avoidance, preservation, or mitigation measures where warranted.

4.4.2.4 Regional

South Central Coastal Information Center

The South Central Coastal Information Center (SCCIC), part of the California Historical Resources Information System (CHRIS), serves Imperial County by maintaining records of previously identified archaeological sites, historic resources, and prior cultural resource investigations. Cultural resource studies prepared for discretionary development projects typically include a records search through CHRIS to determine whether known cultural resources have been previously documented within or adjacent to a project site.

4.4.2.5 Local

City of Calexico General Plan

The City of Calexico General Plan recognizes the importance of preserving the City's archaeological, historical, and cultural resources as part of the community's heritage. The General Plan includes policies encouraging the identification, protection, and appropriate treatment of significant cultural resources during planning and development activities. The General Plan also supports compliance with applicable federal and state laws governing historical resources, archaeological resources, tribal cultural resources, and the treatment of human remains. Implementation of these policies helps ensure that future development considers the preservation of significant cultural resources while accommodating planned growth. The appropriate policies are:

Land Use Element

- **Objective 2.1.6.23.22 (and related policies)**: To identify and preserve significant structures, sites and life stories containing historic or cultural value for the enrichment and enjoyment of future generations.

Public Facilities and Services Element

- **Policy 4.4.1.5.5b**: The City should attempt to use existing public buildings to create a cultural center for its residents.

Economic Development Element

- **Policy 9.6.1.1.1a**: Emphasis shall be made to promote and preserve the qualities and resources that contribute to Calexico' s attractiveness and make the City unique.
- **Policy 9.6.1.1.1b**: Emphasis shall be made to promote and preserve the City's cultural heritage.
- **Policy 9.6.1.1.1g**: The City shall promote downtown as the economic and arts/cultural center of the City.
- **Policy 9.6.1.4.4.4d**: Preserve architecturally important historic structures that are capable of being adapted for viable use.
- **Policy 9.6.1.4.4.4j**: The City shall promote cultural and artistic awareness as a way to enhance the Quality of life for residents and visitors.
- **Policy 9.6.1.4.4.4k:** The City shall provide an improved sense of community through the integration of the arts into the civic identity, through cultural programs, facilities and events, and all aspects of the arts.
- **Policy 9.6.1.4.4.4l:** The City shall encourage cooperation between the schools and community cultural and arts organizations to increase exposure to, appreciation of, and participation in, our cultural activities and heritage.

4.4.3 Significance Determination Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to cultural resources would be significant if the project would:

1) Threshold 1: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
2) Threshold 2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
3) Threshold 3: Disturb any human remains, including those interred outside of formal cemeteries.
4) Threshold 4: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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 listed or eligible for listing in the CRHR, or in a local register or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set form in subdivision (c) of PRC Section 5024.1.

4.4.4 Methodology

RECON prepared a Cultural Resources Report on June 18, 2026. They requested a records search of the project areas with a 0.25-mile buffer at the South Coastal Information Center, a part of the California Historical Resources Information System. RECON also sent a letter to the Native American Heritage Commission (NAHC) on April 2, 2026, requesting a search of the Sacred Lands File to identify spiritually significant and/or sacred sites and traditional use areas in the project vicinity. Additionally, secondary source documentation was reviewed, including the City's General Plan EIR (2007), the County of Imperial General Plan, and review of historic aerial photographs.

4.4.5 Issue 1: Historic Resources

Would the project result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

4.4.5.1 Impact Analysis

Impacts from development that would directly affect, or indirectly affect through alteration of their immediate surroundings, historic resources are considered significant. Table 4.4-1: Previously Recorded Cultural Resources Within 0.25 Miles of Project Area, lists the historic sites identified within the City. As stated in Section 4.4.1.2, Existing Resources, only seven (7) historic resources were identified near the housing sites associated with the project. Although few known significant historic resources exist in the City, implementation of the proposed project could result in impacts to known as well as unknown historical resources in Calexico.

Although the project does not propose specific alterations to known historic resources, future development within the housing sites could directly or indirectly affect such resources. The housing sites may contain buildings or structures that are 50 years old or older at the time of development and may require evaluation for historical significance. Potential direct impacts could include demolition, destruction, relocation, or alteration of historic resources within the project areas. Future projects would be required to comply with applicable local and State policies and regulations governing historic resources. However, because site-specific details are not yet available at this programmatic level of analysis,

including project footprints, designs, and development timelines, impacts to historic resources are considered potentially significant.

4.4.5.2 Mitigation Framework

Analysis of impacts from future development on the built environment would be required at the project level. Any alteration, relocation, demolition, or excessive groundborne vibration associated with future development that would affect historic buildings or structures over 50 years of age would represent a significant impact to historic resources. The following mitigation measures shall be applied to future development of all Discretionary Development Sites and By-Right Development Sites:

MM-CUL-1: Historic Evaluation: For Discretionary Development, prior to approving a future project that would directly or indirectly affect a building or structure over 50 years old, a historic evaluation should be completed by a qualified architectural historian to determine where the affected building or structure is historically significant and eligible for the California Register of Historical Resources. The evaluation shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the California Environmental Quality Act guidelines. If the evaluation determines that the building/structure is not historic, no further evaluation or mitigation would be required. If the building/structure is determined to be historically significant, the preferred mitigation would be to avoid the resource through project redesign. If the resource cannot be avoided, all prudent and feasible measures to minimize or mitigate harm to the resource shall be taken per the recommendations of the City or qualified architectural historian prior to the demolition of the building.

Development of By-Right Development Sites 23 and 36 shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

4.4.5.3 Significance After Mitigation

The potential for future development to affect significant historic resources would be evaluated at the project level based on the location and characteristics of the proposed development and affected resources. Alteration, relocation, demolition, or excessive vibration could damage a historic structure, resulting in a significant impact. However, because the specific characteristics of future development are not known at the program level, even with implementation of **MM CUL-1** for Discretionary Development Sites and applicable regulatory protections for By-Right Development Sites, it cannot be determined at the program level that impacts to significant historic resources would be fully avoided or

reduced to a less than significant level. Therefore, impacts to historic resources would remain **significant and unavoidable**.

4.4.6 Issue 2 and 4: Archaeological Resources, Religious and Sacred Uses or Tribal Cultural Resources

Would the project result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; religious uses or tribal cultural resources?

4.4.6.1 Impact Analysis

Significant impacts to archaeological resources or paleontological resources may result if development occurs on existing undeveloped land which has not been previously surveyed for buried resources in Calexico. Significant impacts to archaeological resources could occur from development in areas mentioned in Section 4.4.1, Existing Conditions, along the New River. The evaluation of potential impacts to archaeological resources and tribal cultural resources for the Housing Element Update focused on the identified housing sites (By-Right Sites), which represent locations where future residential development could occur. A cultural resources records search was completed through the South Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) for each site and a 0.25-mile buffer. In addition, a Sacred Lands File search was requested from the Native American Heritage Commission (NAHC), along with a request for a list of California Native American tribes with traditional or cultural affiliations to the project area for purposes of tribal consultation.

The records search indicates that much of the housing sites have been previously disturbed by agricultural activities and urban development, resulting in a generally low potential for intact subsurface archaeological deposits across most sites. However, two (2) housing sites (By-Right Sites 23 and 36) contain buildings that may be 50 years of age or older and therefore have the potential to contain significant historic-period archaeological deposits or historic built resources. Future development at these sites could result in impacts to historical resources if appropriate avoidance or treatment measures are not implemented.

Although no recorded prehistoric archaeological sites occur within the housing sites, previously unidentified archaeological resources could still be encountered during ground-disturbing activities, particularly in areas that have not been extensively disturbed. Because the Housing Element Update does not approve specific development projects or authorize site grading, the precise extent of future impacts cannot be determined at the program level. As future residential projects are proposed, project-specific environmental review would evaluate the presence of cultural resources and identify appropriate avoidance, preservation, or mitigation measures, as necessary.

4.4.6.2 Mitigation Framework

Mitigation is proposed for implementation of both discretionary and by-right development projects. Mitigation would either be applied during a future discretionary review or for by-right development as a requirement of the City's objective design and performance standards adopted as part of the project. Future development of housing sites would require implementation of the following mitigation framework:

MM CUL-2: Archaeological Resource Assessment: For Discretionary Development, prior to approving a future project or issuance of grading permits, the City shall require applicants for future ground-disturbing projects to determine the presence or absence of archaeological resources and appropriate mitigation measures. Following are steps to complete an assessment:

1. A qualified archaeologist meeting the Secretary of the Interior Standards shall conduct a cultural resources pedestrian survey and request a sacred lands search from the Native American Heritage Commission.
2. If an archaeological resource is identified that has not been evaluated for significance per California Environmental Quality Act thresholds, then an evaluation program shall be completed.
3. If the resource is determined to be significant and avoidance through project redesign is not feasible, a data recovery and construction monitoring program shall be implemented to reduce impacts to the archaeological resource to below a significant level.
4. After construction, a final data recovery and monitoring report shall be submitted to the City. Confidential attachments must be submitted under separate covers. Any artifacts collected during the evaluation, data recovery, and monitoring efforts shall be curated at an appropriate facility or repatriated to a local Native American tribe if requested during Assembly Bill 52 consultation.

For development of By-Right Sites 23 and 36, the City's By-Right Ordinance[1] requires the following:

MM CUL-3: Construction Monitoring: A qualified Native American monitor shall be on-site during earth-disturbing activities at By-Right Sites 23 and 36 because there is a potential for buried significant historic cultural resource deposits given that houses on these sites may be or are over 50 years old. Additionally, any mitigation measures developed through the Assembly Bill 52 Tribal consultation process shall also be completed. If cultural resources are identified during construction monitoring, the archaeological monitor shall have the

[1] The City's By-Right Ordinance amends the Zoning Ordinance consistent with Program 2E of the Housing Element Update, establishing a ministerial review process for By-Right Development Sites.

authority to divert or temporarily halt ground disturbance operations in the area of the discovery. The archaeological monitor shall contact the City Project Manager at the time of discovery and, in consultation with the City Project Manager, shall determine the significance of discovered resources. Isolates and non-significant deposits shall be minimally documented in the field. If the discovery is determined to be significant, a research design and data recovery program shall be prepared by the project archaeologist and approved by the City Project Manager. Construction activities shall be allowed to resume after the City Project Manager has concurred with the significance evaluation and data recovery program.

4.4.6.3 Significance After Mitigation

The potential for ground-disturbing activities associated with future development could encounter and adversely affect known or previously unidentified archaeological resources, resulting in a potentially significant impact. However, because the specific characteristics of future development are not known at the program level, even with implementation of **MM CUL-2** and **MM CUL-3**, it cannot be determined that impacts to significant archaeological resources would be fully avoided or reduced to a less than significant level. Therefore, impacts to archaeological resources would remain **significant and unavoidable**.

4.4.7 Issue 3: Human Remains

Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

4.4.7.1 Impact Analysis

There are no known burial sites or cemeteries within the vicinity of the housing sites. Therefore, it is not expected that human remains would be disturbed as a result of construction of the project areas.

In the unlikely event that human remains are discovered, then the provisions set forth in California PRC Section 5097.98 and state Health and Safety Code Section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the NAHC. No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City shall be required to comply with the California Native American Graves Protection and Repatriation Act (2001), the federal Native American Graves Protection and Repatriation Act (1990), as well as AB 52 early consultation requirements. As regulations are in place to treat any inadvertent uncovering of human remains during grading, impacts to human remains would be less than significant.

4.4.7.2 Mitigation Framework

Impacts to human remains would be less than significant. No mitigation is required.

4.4.7.3 Significance After Mitigation

Impacts to human remains would be **less than significant**.

4.5 Geology and Soils

This section analyzes potential impacts to geology and soils that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

Environmental impacts are evaluated related to geologic/seismic activity and associated landslides, liquefaction and earth movement, soil erosion, loss of topsoil, suitability for septic tanks, and mineral and paleontological resources.

4.5.1 Existing Conditions

4.5.1.1 Geologic Formation

The City of Calexico is located within the Salton Trough, a large structural depression that underlies much of Imperial County and extends northwest from the Gulf of California. The trough occupies approximately 3,100 square miles and includes areas below sea level, such as the Salton Sea, which was once part of ancient Lake Cahuilla. Surrounding mountain ranges, including the Chocolate, Cargo Muchacho, Jacumba, Coyote, Fish Creek, and Santa Rosa Mountains, consist primarily of volcanic, granitic, metamorphic, and igneous rocks, while the valley floor is composed of younger, largely unconsolidated sedimentary deposits. The three major fault zones that bound the Salton Trough and Imperial Valley are the San Andreas on the northeast, the San Jacinto on the northwest, and the Elsinore on the southwest.

The Salton Trough formed through the accumulation of sediments and tectonic activity associated with uplift of the surrounding mountains during the Miocene through Pleistocene epochs. Its development is closely linked to the regional fault systems, particularly the San Andreas and San Jacinto fault systems. Because much of the basin lies below sea level, it has been continuously filled with marine and non-marine sediments over geologic time. The area contains younger Quaternary sediments, as seen on Figure 4.5-1 Geologic Formations. See Section 4.5.1.3, Faults, for additional details regarding faulting and seismicity.

4.5.1.2 Soils

Agricultural production in Imperial County is concentrated on soils formed from the sediments of ancient Lake Cahuilla and on the adjacent East and West Mesas. Lakebed soils are generally flat, fine-grained, and range from loams to clays, while upland soils consist primarily of windblown sands and alluvial deposits. Historically, high salinity levels and shallow groundwater limited agricultural productivity; however, extensive drainage

infrastructure has enabled successful cultivation across large portions of the County (City of Calexico, 2007).

As seen on Figure 4.5-2 Soil Types, within Calexico, soils range from very fine sands to silty clays. These deep, calcium-rich soils were formed from lakebed deposits and are generally moderately to well drained. Long-term irrigation has created localized perched groundwater conditions. Some soils exhibit characteristics such as high shrink-swell potential, low bearing strength, excessive moisture, and elevated fine-grained sediment content, which can constrain development. Areas containing loose, unconsolidated soils and shallow groundwater may also be susceptible to liquefaction during strong seismic events.

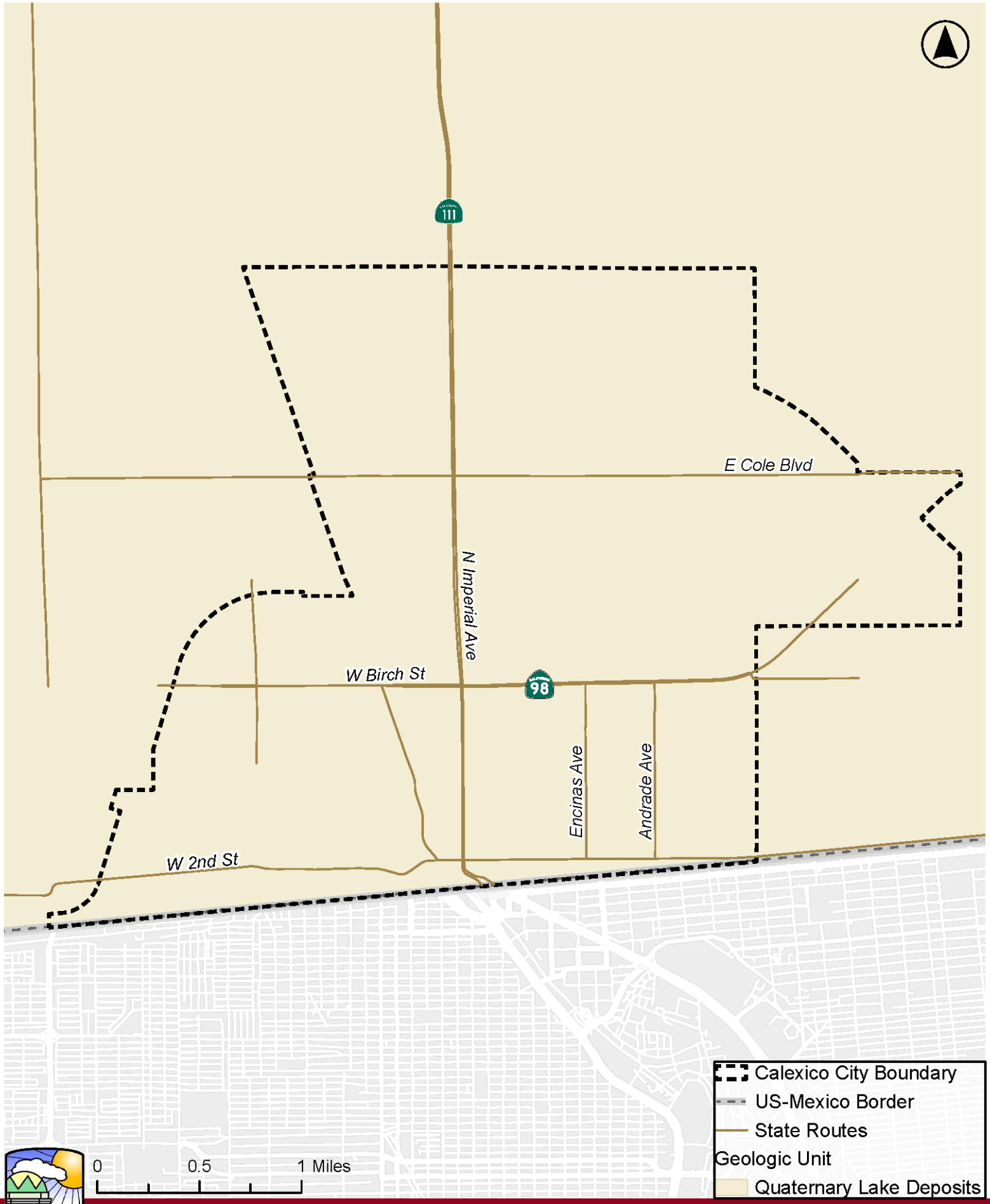


Figure 4.5-1:
Geologic Formations

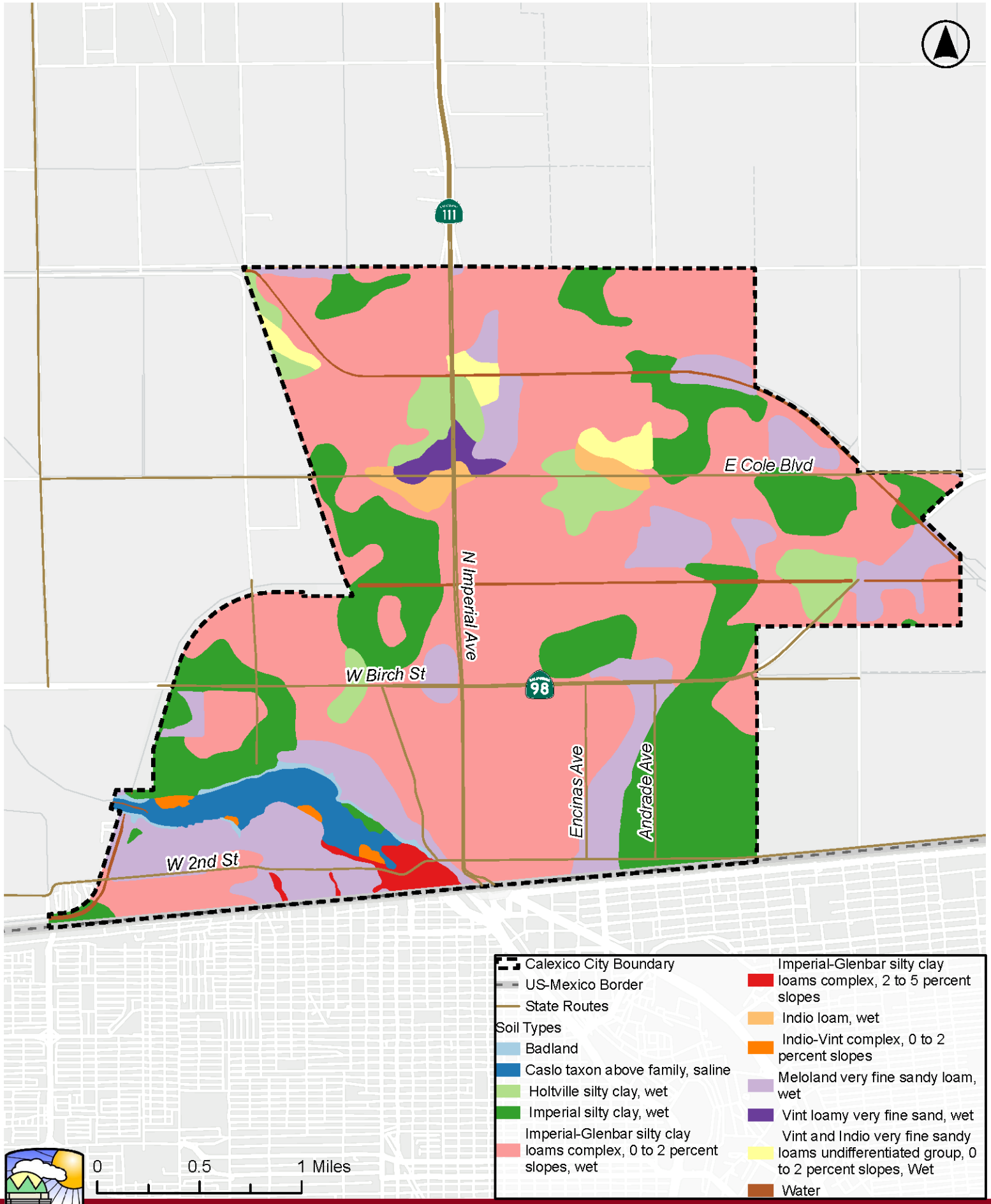


Figure 4.5-2:
Soil Types

4.5.1.3 Faults and Seismicity

Ground subsidence occurs naturally throughout the Salton Trough due to tectonic processes, with rates generally decreasing from the Salton Sea southward toward the U.S.–Mexico border. Localized subsidence features, such as the Mesquite Sink near Brawley, also occur. In addition, seismic events have produced sudden ground-surface elevation changes exceeding one foot in some locations (City of Calexico, 2007). The intensity of ground motion expected at a particular site depends on the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking.

Imperial County contains nine major fault zones, including the San Andreas, Imperial, Algodones Sand Dunes, Calipatria, Boundary, Superstition Hills, Superstition Mountain, Laguna Salada, and Elsinore faults. While several of these fault systems are located near Calexico, no known active fault traces occur within the city limits or its Sphere of Influence.

The San Andreas Fault is the most significant fault system in the region and is capable of generating earthquakes as large as magnitude 8.3. The Imperial Fault, located east of Calexico, has historically produced some of the region's most damaging earthquakes. A magnitude 7.1 earthquake in 1940, centered near the U.S.–Mexico border, caused extensive damage throughout the Imperial Valley, including substantial ground displacement, canal damage, destruction of buildings, loss of life, and significant economic losses. Another major event occurred in 1979 when a magnitude 6.6 earthquake struck the Imperial Fault approximately seven miles east of Calexico. As shown in Figure 4.5-3: Fault Activity, there are no Alquist-Priolo Earthquake Fault Zones within Calexico.

In addition to surface rupture, the major cause of structural damage from earthquakes is seismic ground shaking. Secondary effects of ground-shaking can lead to other seismic hazards, such as seiches, landslides, liquefaction, lateral spreading, and lurching.

Liquefaction and Lateral Spreading

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking and act like a liquid. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. When liquefaction occurs, it can result in ground failure that can result in damage to roads, pipelines, and buildings. In areas subject to elevated liquefaction hazards with high groundwater tables, certain types of activities have the potential to exacerbate liquefaction risk, such as groundwater injection and stormwater infiltration.

Lateral spreading, closely related to liquefaction, occurs when a subsurface layer liquefies and gravitational and inertial forces cause the layer, and the overlying non-liquefied material, to move in a downslope direction. The potential for lateral spreading is highest in areas underlain by soft, saturated materials, especially in areas bordered by sloping banks or inclined planes to an adjacent open face bank or slope.

Calexico has not been included in regional liquefaction analyses by the California Geological Survey and is not in a liquefaction zone (CGS, 2022).

Seiches

A seiche is the oscillation of water within an enclosed or partially enclosed water body, such as a lake or reservoir, typically triggered by an earthquake or strong winds. The City contains no large natural lakes or reservoirs capable of generating damaging seiche waves, and the relatively flat topography further limits the potential for seiche-related impacts. While the City is susceptible to seismic hazards due to its proximity to active faults and the unconsolidated alluvial soils of the Imperial Valley, seiche hazards are considered negligible.

Landslides/Slope Stability

Since the County is generally flat, landslides are not considered a major hazard, as shown in Figure 4.5-4: Landslides and Liquefaction. However, bluff failure and mudslides may occur along slopes and embankments of the rivers and canals (Imperial County, 2021).

Subsidence

Land subsidence is the lowering of ground-surface elevation caused by subsurface processes or human activities, such as groundwater, oil, or gas extraction; peat oxidation; hydrocompaction; or earthquakes. In the Imperial Valley, subsidence could affect irrigation and drainage systems that rely on gravity flow, where even minor elevation changes could disrupt operations and cause localized flooding. Geothermal facilities in Calexico and surrounding areas may also contribute to subsidence depending on the rate and volume of fluid extraction and injection (City of Calexico, 2007). However, according to USGS data, the City of Calexico is not identified as an Area of Land Subsidence in California (USGS, 2026).

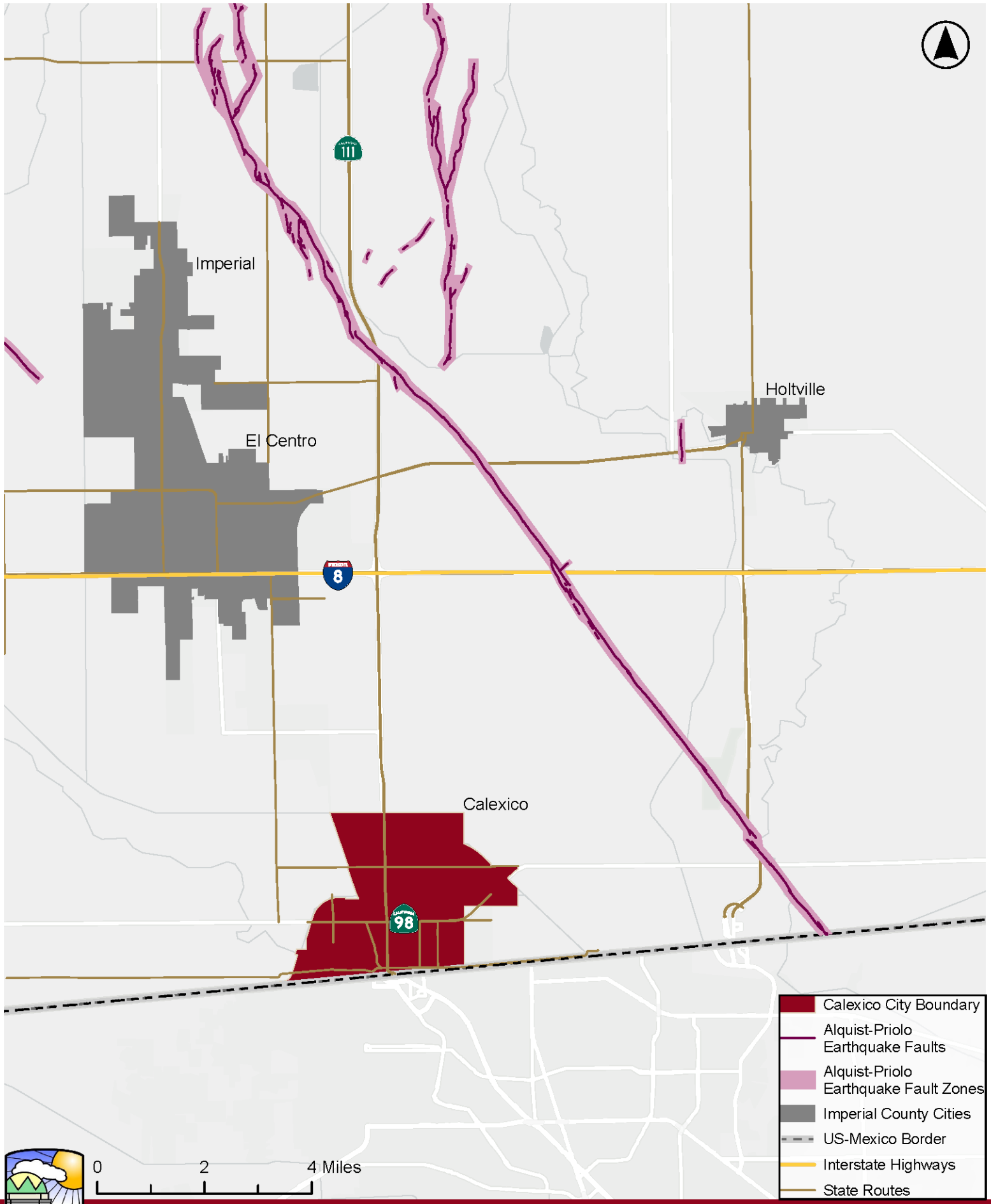


Figure 4.5-3:
Fault Activity

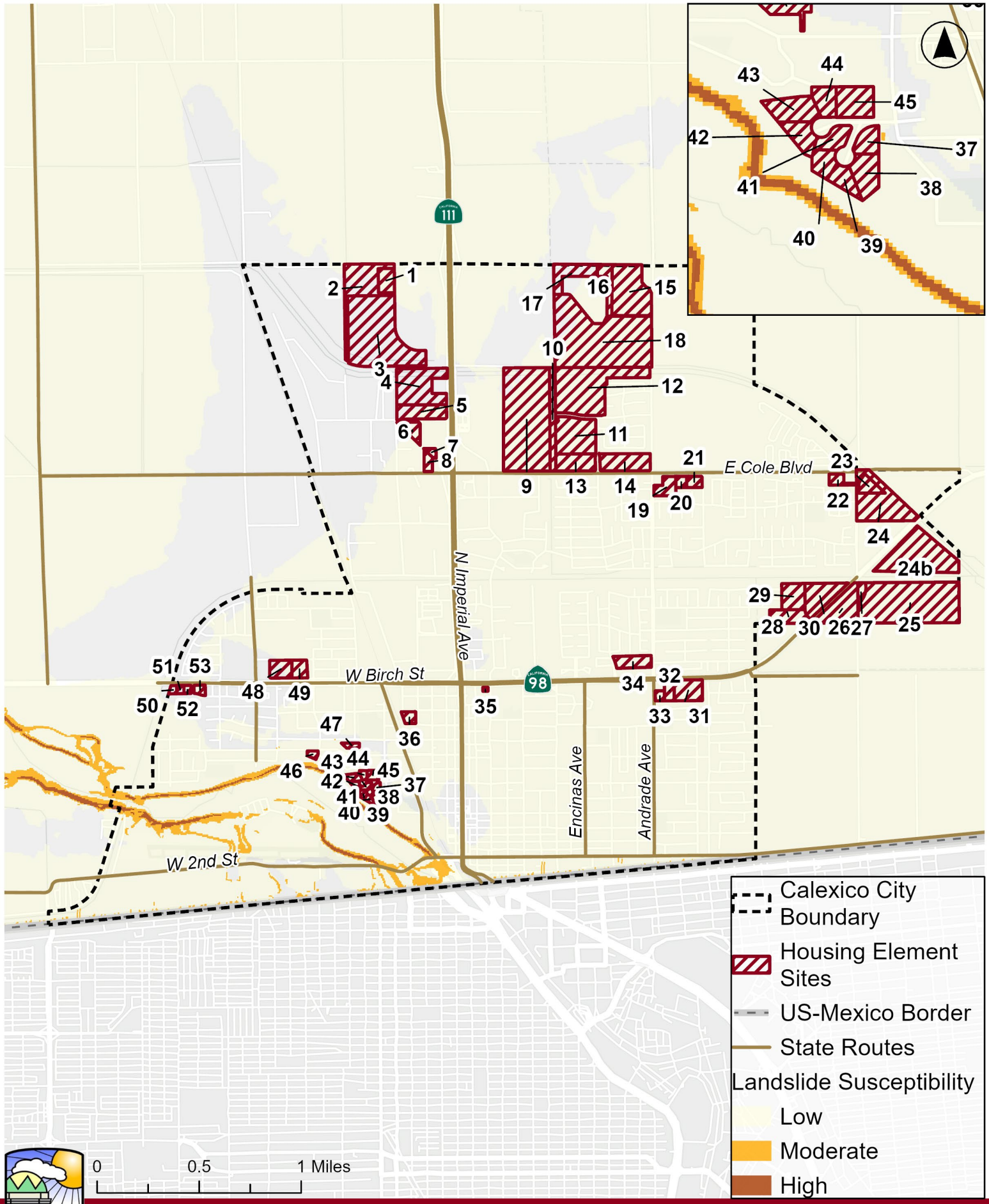


Figure 4.5-4:
Landslides and Liquefaction

4.5.1.4 Paleontological Resources

Paleontology is the study of ancient life based on fossil evidence preserved in rock, including body fossils, tracks, burrows, shed remains, fossilized waste, and chemical traces. The discipline examines how changes in geography, climate, and ecosystems have influenced the evolution of life and contributed to present-day biodiversity. Because fossils are preserved within geologic formations, paleontology is closely related to geology.

As shown on Figure 4.5-1: Geologic Formations, and the Geologic Map of California, San Diego–El Centro Sheet, Calexico contains sedimentary and metasedimentary rocks mapped as "Ql." These units consist of Quaternary lake and playa deposits associated with ancient Lake Cahuilla and date to the late Pleistocene to Holocene. Lake Cahuilla was a former freshwater lake that periodically occupied a major portion of the Salton Trough during late Pleistocene to Holocene time (approximately 37,000 to 240 years ago), depositing sediments that underlie the entirety of the City (Jennings, 1967). Generally, Lake Cahuilla sediments consist of an interbedded sequence of both freshwater lacustrine (lake) and fluvial (river/stream) deposits. The paleontological resources of the Lake Cahuilla Beds are considered significant because of the paleoclimatic and palaeoecological information they can provide, and these deposits are therefore assigned a moderate paleontological potential.

4.5.1.5 Mineral Resources

Imperial County contains a diverse range of mineral resources, including gold, gypsum, sand, gravel, clay, lime, stone, salt, potash, manganese, calcium chloride, and various industrial minerals. These resources contribute to the regional economy and are considered important for long-term resource management. Several significant mineral-producing areas have been identified within the county, including sites that extract clay, sand, and gravel near Calexico.

4.5.1.6 Geothermal Resources

The Salton Trough contains substantial geothermal resources due to the presence of high-temperature groundwater and heated rock formations at relatively shallow depths. Portions of the region contain geothermal fluids hot enough to support commercial electricity generation, and the Imperial Valley is recognized as one of the most significant geothermal resource areas in the world. Extensive reserves of high-temperature geothermal fluids are estimated to underlie the region.

The U.S. Geological Survey has designated nine (9) Known Geothermal Resource Areas (KGRAs) in Imperial County, including the Salton Sea, Westmorland, North Brawley, South Brawley, East Brawley, Heber, East Mesa, Dunes, and Glamis areas. Several of these are located near Calexico. The Heber KGRA, which partially overlaps the city, is one of the

county's largest geothermal resource areas. Geothermal power facilities currently operate in the Heber, East Mesa, and Salton Sea KGRAs, generating substantial renewable energy and providing electricity for hundreds of thousands of residents.

4.5.2 Regulatory Framework

4.5.2.1 Federal

National Earthquake Hazards Reduction Act

The National Earthquake Hazards Reduction Act was enacted to reduce earthquake-related risks to life and property by establishing the National Earthquake Hazards Reduction Program (NEHRP). NEHRP supports improved understanding, characterization, and prediction of earthquake hazards and vulnerabilities; advances in building codes, land use practices, design, and construction methods; risk reduction through post-earthquake investigations and education; expanded mitigation capacity; and faster application of research findings. The Act designates the Federal Emergency Management Agency (FEMA) as the lead agency responsible for program planning, coordination, and reporting. Other participating NEHRP agencies include the National Institute of Standards and Technology, the National Science Foundation, and the USGS.

Uniform Building Code

The Uniform Building Code is a model code that serves as the basis for the California Building Code (CBC). It classifies areas of the United States by seismic hazard potential into four seismic zones, ranging from Zone 1, which has the lowest seismic potential, to Zone 4, which has the highest. The City is located within Seismic Zone 4.

Paleontological Resources Preservation Act (PRPA)

The Paleontological Resources Preservation Act (PRPA) of 2009, enacted as part of the Omnibus Public Land Management Act, requires federal agencies to protect and manage paleontological resources on Federal lands using scientific standards. The PRPA establishes consistent requirements for fossil collection permits, curation of federally owned fossils, and penalties for unauthorized collection, sale, or damage of paleontological resources. These protections generally apply to projects occurring on federal lands or involving federal funding, permits, or approvals.

4.5.2.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was enacted in 1972 to reduce the risk of loss of life and property resulting from surface fault rupture during earthquakes. The Act requires the California Geological Survey (CGS) to identify and map Earthquake Fault Zones around active faults throughout the state. Local jurisdictions must regulate development within

these zones by requiring site-specific geologic investigations for most structures intended for human occupancy before development permits can be approved.

The primary purpose of the Act is to prevent the construction of buildings intended for human occupancy across the traces of active faults. Development projects located within designated Earthquake Fault Zones must demonstrate that no active fault traces are present on the site or that proposed structures are adequately setback from identified fault traces. The Act does not address other seismic hazards such as ground shaking, liquefaction, landslides, or tsunami inundation, which are regulated through other state and local requirements.

According to CGS, the City of Calexico is not located within a designated Alquist-Priolo Earthquake Fault Zone, as no known active faults have been identified within the city limits. However, the city remains subject to strong ground shaking from regional fault systems, including the Imperial and San Andreas Faults, as discussed above.

California Building Code

The California Building Code (CBC), contained in Title 24 of the California Code of Regulations, establishes statewide minimum standards for building design and construction. Based on the International Building Code, the CBC includes requirements for seismic safety, foundations, retaining walls, demolition, grading, drainage, and erosion control, specifically in sections 1613 and 1803. Section 1613 of the CBC governs earthquake loads, and requires new buildings and structural additions to be designed and constructed to resist the seismic forces expected during their useful life. Section 1803 of the CBC requires preparation of a site-specific geotechnical investigation where soil or foundation conditions need evaluation to assess the degree of potential seismic hazards and recommend appropriate design measures for the specific parcels proposed for development.

These standards are intended to protect public safety and property by regulating excavations, foundations, structural frames, retaining walls, and other building elements to reduce risks from seismic shaking and adverse soil conditions. CBC earthquake safety provisions consider factors such as occupancy type, on-site soil and rock conditions, and the expected intensity and probability of ground shaking at a site.

California Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 addresses earthquake-related hazards other than surface fault rupture, including liquefaction and seismically induced landslides. The Act requires the State Geologist to map seismic hazard zones to support local land use planning and help cities and counties prepare general plan safety elements and adopt policies and

regulations that reduce seismic risks to public health and safety. Under Section 2697(a), cities and counties must require a geotechnical report that identifies and evaluates seismic hazards associated with a project before approval.

California Code of Regulations, Title 14, Division 3, Chapter 1 (Section 5097.5)

Title 14, Division 3, Chapter 1 of the California Code of Regulations prohibits the destruction, disturbance, or mutilation of geological features, including paleontological resources. These requirements apply to future excavation and grading activities within the project sites.

Construction Stormwater General Permit

The General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a SWPPP that specifies construction best management practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

Typical Best Management Practices (BMPs) contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

4.5.2.3 Regional

County Land Use Ordinance – Title 9

Title 9, Division 15, Geological Hazards, of the County Land Use Ordinance establishes procedures and standards for development within earthquake fault zones. County

regulations prohibit buildings intended for human occupancy from being constructed across active fault traces. An exception may apply where a geotechnical analysis demonstrates that a building near a fault or within a designated Special Studies Zone would not expose occupants to undue hazard.

The Land Use Program also protects public health and the environment through permit and review requirements for on-site wastewater treatment systems, such as septic systems. The Imperial County Ordinance designates the Division of Environmental Health as the local authority for septic system permits. The County also establishes minimum siting and design standards, including evaluation by a qualified professional to confirm that soil and site conditions can support proper system function without degrading water quality or creating public health risks.

Imperial County Multi-Jurisdictional Hazard Mitigation Plan

The Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) is a comprehensive framework designed to assess local vulnerabilities and develop strategies to minimize injuries, property damage, and community disruptions from disasters in Imperial County. The MHMP identifies earthquakes as the principal geologic hazard affecting public safety in the County. The deep, sediment-filled Imperial Valley is particularly susceptible to amplified ground shaking, increasing the likelihood of structural damage during significant seismic events. The MHMP recognizes liquefaction as one of the primary secondary hazards associated with earthquakes.

The MHMP also recognizes that strong ground shaking is the City's primary geologic hazard, noting that future moderate to large earthquakes could result in damage to buildings, transportation facilities, utilities, and critical infrastructure. The fine-grained alluvial soils underlying much of Calexico contribute to increased seismic hazards. While these soils generally support urban development when properly engineered, they are more prone to earthquake-induced settlement and liquefaction than competent bedrock. The MHMP addresses these hazards through the region and within Calexico through CBC compliance, site-specific geotechnical investigations required during project-level review, and implementation of local grading and foundation design standards and best engineering practices.

Imperial County General Plan – Seismic and Public Safety Element

The Seismic and Public Safety Element of the Imperial County General Plan contains goals and policies to minimize the risks associated with natural and human-made hazards, including seismic/geological hazards, flood hazards, and Imperial Irrigation District Lifelines. These goals and policies are related to land use planning, public safety, and

disaster preparedness, response, and recovery throughout the County. Goals related to geological and soil resources include:

- **Goal 1**: Integrate public health and resilience into land use planning.
- **Goal 2**: Avoid loss of life, injury, and property damage from seismic and geologic hazards.
- **Goal 6**: Prepare for and respond to natural and human-caused disasters to deliver vital services in the event of emergency to avoid the loss of life and minimize impacts to health and property.

4.5.2.4 Local

City of Calexico General Plan

The City of Calexico County General Plan provides goals, objectives, and policies for protecting geologic resources and soils. These objectives, and associated policies, include:

2007 Conservation and Open Space Element

- **Objective 5.4.1.2**: The City shall continue using soil management techniques that minimize soil related problems, including erosion, shrink-swell behavior, and septic tank failure.

2007 Safety Element

- **Objective 8.5.1.1**: To maintain acceptable risk levels when conducting land use planning.
- **Objective 8.5.1.2**: All development in the City shall adhere to standards for grading and construction which reduce the potential of seismic hazards.

Calexico Storm Water Program

The City of Calexico implements a Storm Water Program to protect surface water quality by reducing pollutants discharged through the municipal storm drain system. The program is administered in accordance with the federal Clean Water Act and the State Water Resources Control Board's Phase II Municipal Separate Storm Sewer System (MS4) General Permit under the oversight of the Colorado River Basin Regional Water Quality Control Board. The program focuses on preventing pollutants such as sediment, trash, oil and grease, pesticides, fertilizers, and other contaminants from entering the storm drain system. Program elements include public education and outreach, illicit discharge detection and elimination, municipal maintenance activities, and implementation of best management practices (BMPs) to improve stormwater quality. Projects subject to the program are required to implement erosion and sediment control BMPs, such as stabilized construction entrances, perimeter controls, sediment barriers, and temporary soil stabilization

measures, to reduce soil loss and prevent sediment from being transported off-site in stormwater runoff.

Calexico Municipal Code

Section 16.24.060 of the Calexico Municipal Code (CMC) requires a preliminary soil report, prepared by a state-registered civil engineer, based upon adequate test borings or excavations of every subdivision prior to the submission of final subdivision maps. f the preliminary soil report indicates the presence of critically expansive soils or other soil problems which, if not corrected, would lead to defects in structures erected thereon, a soil investigation of each lot in the subdivision shall be prepared by a State-registered civil engineer.

4.5.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts related to geology and soils would be significant if the project would:

1) Threshold 1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);
    ii. Strong seismic ground shaking;
    iii. Seismic-related ground failure, including liquefaction; and
    iv. Landslides
2) Threshold 2: Result in substantial soil erosion or the loss of topsoil.
3) Threshold 3: 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.
4) Threshold 4: 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.
5) Threshold 5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
6) Threshold 6: Directly or indirectly destroy, disturb, or remove a unique paleontological resource, site, or geologic feature.

4.5.4 Methodology

The potential for significant impacts associated with the project is based upon review of secondary sources, policies, and regulations relevant to geological and soil related issues. This review included soils data from the California Geological Survey and United States Geological Survey (USGS) fault and geologic mapping. Based on the materials reviewed, the project was analyzed to determine the possibility of on-site geologic hazards based on potential seismic activity, and characteristics of onsite soils.

The analysis of paleontological resources is based on a paleontological records search request made to the San Diego Natural History Museum (SDNHM) on June 23, 2026 (Appendix F). Results determined whether there are previously recorded fossil localities or paleontologically sensitive formations within the City or vicinity that require inclusion in the current analysis. The results also provide a basis for assessing the sensitivity of the City in regard to the potential for surface and subsurface paleontological resources to exist.

4.5.5 Issue 1 and 3: Seismic Hazards and Unstable Geology

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- *(i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42);*
- *(ii) strong seismic ground shaking?*
- *(iii) seismic-related ground failure, including liquefaction; or*
- *(iv) landslides?*

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

4.5.5.1 Impact Analysis

(i) Fault Rupture

Calexico is located west of the Imperial Fault Zone (Figure 4.5-3 Fault Activity), where past earthquakes have caused substantial damage to people and structures. From the City center, Calexico is located approximately 6 miles west of the nearest Alquist-Priolo Earthquake Fault Line. Considering this distance and the generally low to moderate seismic activity commonly observed in the area, it is unlikely that any project activities would include geothermal energy activities that would directly or indirectly cause surface fault rupture

along the Imperial Alquist-Priolo Earthquake Fault Zones outside the City. This impact would be less than significant.

(ii) Strong Seismic Ground Shaking

The City is located in a seismically active region of southern California that is expected to experience substantive seismic events in the future. The amount of ground shaking would depend on a number of different factors including magnitude of the event, distance to the source, depth of displacement, duration of shaking, and the characteristics of the underlying materials. In this seismically active region, future development could expose people and structures to strong seismic ground shaking associated with the Imperial Fault.

Further, new development facilitated by the proposed project would be subject to Calexico and CBC engineering design and construction measures and requirements. Development designed in accordance with the CBC would be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Compliance with the CBC would minimize potential structural damage and the exposure of people to the risk of injury or death from structural failure. Foundations and other structures or features would be designed to resist and absorb damaging forces from strong ground shaking in accordance with CBC requirements. As discussed in Section 4.5.2.2, the CBC requires every structure and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, to be designed and constructed to resist the effects of earthquake motions. The CBC also requires preparation of a site-specific geotechnical investigation to assess the degree of potential seismic hazards and recommend appropriate design measures for the specific parcels proposed for development.

With adherence to existing California structural design requirements, future development facilitated by the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be less than significant.

(iii) Ground Failure, Liquefaction, Subsidence

Subsidence occurs naturally in the Imperial Valley, with the greatest rates occurring near the Salton Sea and diminishing to near zero near the U.S.–Mexico border, according to the Imperial County General Plan and CGS liquefaction data. Calexico and surrounding areas may be susceptible to liquefaction from crop irrigation, shallow groundwater conditions, and geologically young, unconsolidated sediments. As discussed in Section 4.5.1, Existing Conditions, there are no significant liquefaction zones in Calexico, indicating a low potential

for substantial adverse effects involving seismic-related ground failure and liquefaction (CGS 2023).

Full buildout facilitated by the project could increase the number of people, structures, and infrastructure exposed to potential liquefaction hazards. However, the City of Calexico is not within a mapped liquefaction hazard zone. Compliance with the CBC and applicable City requirements, including seismic and foundation design standards in CBC Chapters 16 and 18, would reduce risks to life and property associated with liquefaction. Future development in areas with potential landslide or liquefaction hazards would also be reviewed at the project-specific level through the City's standard building review process. This review would ensure that appropriate recommendations are implemented and that development facilitated by the project would not exacerbate seismic-related ground failure risks, including liquefaction. Therefore, this impact would be less than significant.

(iv) Landslides

As discussed in Section 4.5.1, Existing Conditions, due to its flat topography, Calexico is not susceptible to landslides (CGS, 2023). According to CGS data and the MHMP, the City does not lie within an area that is naturally subject to landslides; this type of hazard is largely restricted to the western edge of the County where hills are located. There is only moderate potential for landslides in the City in areas immediately adjacent to rivers and canals, as shown on Figure 4.5-4, Landslides and Liquefaction. Housing sites 37 through 45 are located near the New River where landslide potential exists. but no new development at these sites would occur, seeing as the project is programmatic and does not approve any future development. If construction were to occur on identified housing sites, site-specific conditions would need to be assessed to ensure impacts related to landslides would not occur.

Future development of these sites would be required to comply with the California Building Standards Code (Title 24 of the California Code of Regulations), including applicable provisions governing foundation design, grading, slope stability, retaining structures, and drainage. Where warranted by site conditions, local permitting requirements may require preparation of site-specific geotechnical investigations prepared by a qualified geotechnical engineer or engineering geologist. Such investigations would evaluate slope stability, soil characteristics, groundwater conditions, and appropriate engineering measures to ensure that proposed development is designed to provide an adequate margin of safety against slope failure. Recommendations from these investigations would be incorporated into project design as conditions of approval, where applicable. In addition, subdivision projects are subject to the soil report requirements of CMC Section 16.24.060.

Because the proposed project itself does not approve construction or intensify development on any specific site, and because future development would be subject to site-specific geotechnical investigation, compliance with applicable building code requirements, and any necessary environmental review, implementation of the proposed project would not directly expose people or structures to substantial adverse effects related to landslides. As such, impacts would be less than significant.

Unstable Geologic Unit

Unstable geologic units or soils are characterized by materials lacking sufficient integrity to support new buildings. As seen in Figure 4.5-2, Soil Types, some of the soils in the project area exhibit low bearing strength and, thus, may be unsuitable for development without measures being taken to ensure that adverse effects to structures built on these soils will not occur. Although the project does not approve any future development, if construction were to occur on identified housing sites, site-specific conditions would need to be assessed to ensure impacts related to soil would not occur.

Other potential impacts related to unstable geologic units and soil including liquefaction, subsidence, and landslides are discussed in Sections 4.5.5.1(i)-(iv) above and were found to be less than significant. Lateral spreading is related to liquefaction and would also be addressed through adherence to the CBC requirements such that the potential for adverse effects from lateral spreading would be less than significant.

4.5.5.2 Mitigation Framework

The project does not approve any new or additional development and instead is a policy level document intended to guide future housing growth. Any new development would be subject to site-specific CEQA analysis. Adherence to the CBC which requires new buildings and structural additions to be constructed to resist the seismic forces, as well as the preparation of site-specific geotechnical investigations where soil or foundation conditions need evaluation to assess the degree of potential seismic hazards, would ensure appropriate design measures for any parcel-specific construction are followed to reduce potential geologic hazards. Compliance with these regulatory requirements would ensure that future projects result in less than significant impacts related to seismic hazards and unstable geology.

4.5.5.3 Significance After Mitigation

Impacts would be less than significant.

4.5.6 Issue 2: Soil Erosion

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

4.5.6.1 Impact Analysis

According to the Imperial Valley Area Soil Survey, soils in the City area occur on nearly level terrain, with slopes generally less than two percent; as a result, natural erosion rates are low. However, project implementation could result in construction-related erosion and topsoil loss during future development. Construction activities that disturb one or more acres of land surface are subject to the NPDES Construction Stormwater General Permit for Construction Activities, administered by the California Regional Water Quality Control Board, Colorado River Basin Region (Region 7). The permit requires preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) identifying best management practices (BMPs) to reduce or prevent construction-related erosion and sedimentation. Imperial County Air Pollution Control District Rules 800-806 also include fugitive dust control measures for construction and operational activities, including physical and chemical stabilizers to avoid erosion.

Operations of implementing projects are required to comply with MS4 General Permit requirements that provide reduction of pollutants in storm water and post construction permanent storm water control requirements. Compliance with these regulatory requirements would ensure that future projects result in less than significant impacts related to soil erosion and loss of topsoil.

4.5.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.5.6.3 Significance After Mitigation

Impacts would be less than significant.

4.5.7 Issue 4: Expansive Soils

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

4.5.7.1 Impact Analysis

Soils within and around the City of Calexico range from very fine sands to silty clays derived from ancient lakebed deposits, as seen on Figure 4.5-2, Soil Types. Some of these soils exhibit characteristics associated with expansive soils, including high shrink-swell potential resulting from changes in moisture content. Expansive soils can cause differential settlement, cracking, and damage to foundations, pavement, and underground utilities if not properly addressed during project design and construction.

Pursuant to the CBC, development facilitated by the proposed project would be subject to minimum standards for engineered subgrade and slab reinforcement, which help concrete

slabs resist expansive soil conditions. Rain gutters, downspouts, rain leaders, splash blocks, and concrete landings would also be required to direct water away from foundations and slabs, thereby reducing the potential for expansive soils to damage structures.

Consistent with current CBC requirements, a final design-level geotechnical investigation would be required before issuance of building permits for any site suspected to have expansive soils, sliding, liquefaction, high groundwater, or steep slopes. The geotechnical report would recommend appropriate measures, such as soil treatment through chemical stabilization with lime, cement, or fly ash, or these of engineered fill meeting building code standards where necessary. Therefore, compliance with CBC requirements would reduce potential impacts related to expansive soils to a less than significant level, and no mitigation is required.

4.5.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.5.7.3 Significance After Mitigation

Impacts would be less than significant.

4.5.8 Issue 5: Septic Tanks or Alternative Wastewater Disposal

Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

4.5.8.1 Impact Analysis

Due to the urban and built out nature of the City, there is no expectation that septic tanks or alternative wastewater disposal systems would be part of any future development proposal. As discussed in Section 4.13, Utilities and Service Systems, all future housing development in the City would be served by the City of Calexico Wastewater Treatment Plant (WWTP) for wastewater service. No impacts would occur related to the use of septic tanks or alternative wastewater disposal systems as all sites would connect to the public wastewater system.

4.5.8.2 Mitigation Framework

No impact would occur. No mitigation is required.

4.5.8.3 Significance After Mitigation

No impact would occur.

4.5.9 Issue 6: Paleontological Resources and Unique Geology

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

4.5.9.1 Impact Analysis

The moderate paleontological resource potential of the Lake Cahuilla Beds suggests the potential for future development within the City to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of this geologic unit have the potential to impact the paleontological resources preserved therein. For example, the housing sites are located on Quaternary Lake deposits, which could underly formations with paleontological sensitivity. At a program level of review, it is not possible to investigate each individual site to determine the depth of geologic formations and identify their associated paleontological sensitivity. If grading were to occur at depths sufficient to disturb a moderate sensitivity geologic formation with potential paleontological resources, significant impacts could result. Potential impacts to paleontological resources could be significant without mitigation.

4.5.9.2 Mitigation Framework

Mitigation is proposed for implementation of both discretionary and by-right development projects. Mitigation would either be applied during a future discretionary review or for by-right development or would be applied as a requirement of the City's objective design and performance standards adopted as part of the project. Future development of housing sites would require implementation of the following mitigation framework:

MM GEO-1: Paleontological Resources Monitoring: To address potential impacts to paleontological resources, the City shall review project application materials, including any geotechnical investigations, to determine whether proposed grading or excavation activities have the potential to disturb geologic formations with moderate or high paleontological sensitivity. If ground-disturbing activities are limited to previously disturbed soils or surficial deposits with low paleontological sensitivity, no monitoring shall be required. The City may require the applicant to provide information regarding grading depths, geologic formations, and paleontological sensitivity to determine the potential for impacts.

If grading or excavation activities may disturb geologic formations with moderate or high paleontological sensitivity, the following measures shall be implemented prior to and during ground-disturbing activities:

1. **Preconstruction Personnel and Repository.** Prior to the issuance of grading permits, the applicant shall retain a qualified paleontologist to oversee implementation of the mitigation program. A qualified paleontologist shall possess a graduate degree in paleontology, geology, or a related field and have demonstrated experience in paleontological resource identification, monitoring, and mitigation within southern California. A qualified regional repository, such as a museum or

university collection that meets professional curation standards, shall be identified to receive any recovered fossil specimens.

2. **Preconstruction Meeting.** The qualified paleontologist shall attend a preconstruction meeting with grading and excavation contractors to review excavation schedules, paleontological monitoring procedures, fossil recovery protocols, and site safety requirements.
3. **Worker Environmental Awareness Training.** Prior to commencement of grading activities, the qualified paleontologist shall provide paleontological resource awareness training to construction personnel involved in ground-disturbing activities. Training shall include the identification of fossil resources, reporting procedures, and avoidance requirements.
4. **Construction Monitoring.** A qualified paleontological monitor working under the direction of the qualified paleontologist shall monitor grading and excavation activities in areas underlain by geologic units with moderate or high paleontological sensitivity. Monitoring shall occur during original excavation of previously undisturbed native sediments and continue as determined necessary by the qualified paleontologist.
5. **Fossil Recovery.** If paleontological resources are encountered, the qualified paleontologist or paleontological monitor shall evaluate and recover the resources. Construction activities within the immediate vicinity of the discovery may be temporarily redirected, diverted, or halted, as necessary, to allow for the identification, documentation, and recovery of significant fossil specimens.
6. **Laboratory Treatment.** Recovered fossil specimens shall be cleaned, stabilized, identified, cataloged, and prepared in accordance with current professional paleontological standards.
7. **Curation.** All scientifically significant fossil specimens, together with associated field notes, photographs, maps, and other documentation, shall be curated at the designated repository in accordance with repository requirements and accepted professional standards.
8. **Final Report.** Upon completion of monitoring and mitigation activities, the qualified paleontologist shall prepare a final paleontological resources report documenting the results of the monitoring program, the geologic units encountered, fossil discoveries, recovery methods, and curation information. The report shall be submitted to the City and retained as part of the project record.

4.5.9.3 Significance After Mitigation

With implementation of MM-GEO-1, impacts associated with paleontological resources would be reduced to **less than significant.**

4.6 Greenhouse Gas Emissions

This section analyzes potential impacts to greenhouse gas emissions that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

This evaluation includes the potential for the proposed project to result in significant emissions of greenhouse gases. A Greenhouse Gas Emissions Technical Report including modeling data was prepared by RECON and is contained in Appendix G, Greenhouse Gas Analysis for the City of Calexico Housing Element Update of this Draft Program Environmental Impact Report (DEIR). This analysis includes criteria pollutant emission data calculated using the California Emissions Estimator Model (CalEEMod).

4.6.1 Existing Conditions

4.6.1.1 Environmental Setting

Understanding Global Climate Change

To evaluate the incremental effect of the proposed project on statewide greenhouse gas (GHG) emissions and global climate change, it is important to have a basic understanding of the nature of the global climate change problem. Global climate change refers to long-term changes in the Earth's climate, including temperature, precipitation, and weather patterns. Although the climate has naturally fluctuated throughout geologic history, scientific evidence indicates that the accelerated warming observed since the Industrial Revolution cannot be explained by natural cycles alone. Increased combustion of fossil fuels and other human activities have significantly increased atmospheric concentrations of greenhouse gases (GHGs), which trap heat and contribute to global warming. Because GHG emissions from individual projects combine with emissions from countless other sources worldwide, climate change is recognized under CEQA as a cumulative environmental impact, requiring evaluation of a project's incremental contribution to global GHG emissions.

Greenhouse Gases of Primary Concern

There are numerous GHGs, both naturally occurring and manmade. Each GHG has variable atmospheric lifetime and global warming potential (GWP). The atmospheric lifetime of the gas is the average time a molecule stays stable in the atmosphere. Most GHGs have long atmospheric lifetimes, staying in the atmosphere hundreds or thousands of years. GWP is a measure of the potential for a gas to trap heat and warm the atmosphere. Although GWP is related to its atmospheric lifetime, many other factors including chemical reactivity of the

gas also influence GWP. GWP is reported as a unitless factor representing the potential for the gas to affect global climate relative to the potential of carbon dioxide (CO2). Because CO2 is the reference gas for establishing GWP, by definition its GWP is one (1). Although methane (CH4) has a shorter atmospheric lifetime than CO2, it has a 100 year GWP of 28; this means that CH4 has 28 times more effect on global warming than CO2. Table 4.6-1: Global Warming Potential and Atmospheric Lifetimes summarizes some of the most common GHGs.

Table 4.6-1: Global Warming Potential and Atmospheric Lifetimes

Gas	Atmospheric Lifetime (years)	100-year GWP	20-year GWP
Carbon dioxide (CO_2)	50–200	1	1
Methane (CH_4)	12.4	25/28*	84
Nitrous oxide (N_2O)	121	298/265*	264
HFC-23	222	12,400	10,800
HFC-32	5.2	677	2,430
HFC-125	28.2	3,170	6,090
HFC-134a	13.4	1,300	3,710
HFC-143a	47.1	4,800	6,940
HFC-152a	1.5	138	506
HFC-227ea	38.9	3,350	5,360
HFC-236fa	242	8,060	6,940
HFC-43-10mee	16.1	1,650	4,310
CF_4	50,000	6,630	4,880
C_2F_6	10,000	11,100	8,210
C_3F_8	2,600	8,900	6,640
C_4F_{10}	2,600	9,200	6,870
c-C_4F_8	3,200	9,540	7,110
C_5F_{12}	4,100	8,550	6,350
C_6F_{14}	3,100	7,910	5,890
SF_6	3,200	23,500	17,500

SOURCE: Intergovernmental Panel on Climate Change (IPCC) 2007, 2014.
*The CH_4 and N_2O 100-year GWPs included in CalEEMod are 25 and 298, respectively, from the IPCC Fourth Assessment Report. All other values are from the current Fifth Assessment Report.

All of the gases in Table 4.6-1: Global Warming Potential and Atmospheric Lifetimes are produced by either biogenic (natural) source, anthropogenic (human) sources, or both. These are the GHGs of primary concern in this analysis. CO2 would be emitted by the future development implemented under the project due to the combustion of fossil fuels in vehicles (including construction), from electricity generation and natural gas consumption,

from water use, and from solid waste disposal. Smaller amounts of CH4 and N2O would be emitted from the same operational sources.

4.6.2 Regulatory Framework

4.6.2.1 Federal

The federal government, U.S. Environmental Protection Agency (U.S. EPA), and other federal agencies have many federal level programs and projects to reduce GHG emissions. In June 2012, the Council on Environmental Quality (CEQ) revised the Federal Greenhouse Gas Accounting and Reporting Guidance originally issued in October 2010. The CEQ guidance identifies ways in which federal agencies can improve consideration of GHG emissions and climate change for federal actions. The guidance states that National Environmental Policy Act (NEPA) documents should provide decision makers with relevant and timely information and should consider (1) GHG emissions of a Proposed Action and alternative actions and (2) the relationship of climate change effects to a Proposed Action or alternatives. Specifically, if a Proposed Action would be reasonably anticipated to cause direct emissions of 25,000 MT CO2E GHG emissions on an annual basis, agencies should consider this as an indicator that a quantitative assessment may be meaningful to decision makers and the public (CEQ, 2012).

U.S. Environmental Protection Agency

In *Massachusetts et al. v. Environmental Protection Agency et al.*, 549 U.S. 497 (2007), the Supreme Court of the United States held that greenhouse gases (GHGs), including carbon dioxide (CO_2), are air pollutants under the Clean Air Act (CAA), confirming the U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions. In 2009, the EPA issued its “Endangerment Finding,” concluding that elevated atmospheric GHG concentrations endanger public health and welfare, which became the basis for federal regulation of GHG emissions. The EPA subsequently implemented programs regulating emissions from mobile and stationary sources and established the Greenhouse Gas Reporting Program, which requires major emission sources meeting specified thresholds to report annual GHG emissions under the CAA.

On February 12, 2026, the U.S. EPA repealed the Endangerment Finding along with all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines pursuant to CAA Section 202(a).

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy standards determine the fuel efficiency of certain vehicle classes in the U.S. The National Highway Traffic Safety Administration sets Corporate Average Fuel Economy standards for passenger cars and for light trucks

(collectively, light-duty vehicles) and separately sets fuel consumption standards for medium- and heavy-duty trucks and engines. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel. The most recent standards require an industry-wide fleet average of approximately 50.4 miles per gallon for passenger cars and light trucks in model year 2031. The final Corporate Average Fuel Economy standards increase at a rate of two (2) percent per year for passenger cars in model years 2027 to 2031 and two (2) percent per year for light trucks in model years 2029 to 2031.

Public Laws No. 119-15 and 119-16

On June 12, 2025, Public Law 119 15, enacting House Joint Resolution 87, was signed into law. The law used the Congressional Review Act to nullify the U.S. EPA's rule that had granted California a waiver to enforce stricter emissions standards for heavy-duty vehicles under the Clean Air Act. The disapproved rule included programs such as the Advanced Clean Trucks regulation and zero-emission requirements for airport shuttles. Passed under the Congressional Review Act, the law prevents U.S. EPA from implementing or reissuing the same or similar rules without new congressional authorization. This effectively blocks California, and other states that follow its standards, from enforcing these specific vehicle emission and warranty regulations.

Similarly on June 12, 2025, Public Law No. 119-16, enacting House Joint Resolution 88, became law. The law also relied on the Congressional Review Act to void the U.S. EPA's December 2024 waiver under the CAA that allowed California to implement and enforce the Advanced Clean Cars (ACC) II regulation. ACC II included a zero-emission vehicle mandate targeting 100 percent new light-duty zero-emission vehicle sales by 2035. Public Law No. 119-16 marks the first ever occurrence that waivers under the CAA have been revoked under the Congressional Review Act. The implications of this law on the State's capability to enforce its independent fuel economy standards are uncertain at this time, as the California Attorney General is pursuing legal action challenging Public Law No. 119-16. Whether this action will be successful is unknown, as is the possibility that a federal judge will issue a stay to halt the implementation of the ACC II regulation during the legal process.

4.6.2.2 State

California Air Resources Board (CARB) State GHG Inventory

The California Air Resources Board (CARB) performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high GWP emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in million metric tons of CO2 equivalent (MMT CO2E). Table 4.6-2: California GHG Emissions by Sector shows the

estimated statewide GHG emissions for the years 1990, 2005, 2012, 2018, and 2023. Although annual GHG inventory data is available for years 2000 through 2023, the years 1990, 2005, 2012, 2018, and 2023 are highlighted in Table 4.6-2: California GHG Emissions by Sector because 1990 is the baseline year for established reduction targets, 2005, 2012, and 2018 correspond to the same years for which inventory data for the region is available, and 2023 is the most recent data available.

Table 4.6-2: California GHG Emissions by Sector

Sector	1990[1] Emissions in MMT CO_2E (% total)[2]	2005[3] Emissions in MMT CO_2E (% total)[2]	2012[3] Emissions in MMT CO_2E (% total)[2]	2018[3] Emissions in MMT CO_2E (% total)[2]	2023[3] Emissions in MMT CO_2E (% total)[2]
Electricity Generation	110.5 (25.7%)	108.1 (22.6%)	99.1 (22.8%)	65.1 (15.8%)	57.3 (15.9%)
Transportation	150.6 (35.0%)	187.6 (39.2%)	161.8 (37.2%)	169.6 (41.3%)	137.2 (38.1%)
Industrial	105.3 (24.4%)	102.3 (21.4%)	91.0 (20.9%)	93.7 (22.8%)	78.4 (21.8%)
Commercial	14.4 (3.4%)	16.1 (3.4%)	19.6 (4.5%)	22.3 (5.4%)	23.5 (6.6%)
Residential	29.7 (6.9%)	30.3 (7.0%)	27.9 (6.4%)	28.1 (6.8%)	34.7 (9.6%)
Agriculture & Forestry	18.9 (4.4%)	33.7 (7.0%)	35.2 (8.1%)	32.2 (7.8%)	29.2 (8.1%)
Not Specified	1.3 (0.3%)	--	--	--	--
Total[4]	**430.7**	**478.1**	**434.6**	**411.0**	**360.3**

SOURCE: CARB 2007 and 2025.
[1]1990 data was obtained from the CARB 2007 source and are based on Intergovernmental Panel on Climate Change (IPCC) fourth assessment report GWPs.
[2]Percentages may not total 100 due to rounding.
[3]2005, 2012, 2018, and 2023 data were retrieved from the CARB 2025 source and are based on IPCC fourth assessment report GWPs.
[4]Totals may vary due to independent rounding.

As shown in Table 4.6-2: California GHG Emissions by Sector, statewide GHG source emissions totaled approximately 431 MMT CO2E in 1990, 478.1 MMT CO2E in 2005, 434.6 MMT CO2E in 2012, 411.0 MMT CO2E in 2018, and 360.3 MMT CO2E in 2023. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. Also shown, transportation-related emissions consistently contribute to the most GHG emissions.

Executive Orders S-3-05 and B-30-15

Executive Order (EO) S-3-05 established the following GHG emission reduction targets for the State of California:

- 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.

This EO also directs the secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report shall also prepare and document mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006, and has since been updated every two (2) years.

EO B-30-15, issued on April 29, 2015, establishes an interim GHG emission reduction goal for the state of California by 2030 of 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in EO S-3-05. Additionally, this EO directed CARB to update its Climate Change Scoping Plan to address the 2030 goal.

Assembly Bill 1279

Assembly Bill (AB) 1279, approved in September 2022, 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, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels. The bill would require the state board to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies.

California Global Warming Solutions Act

In response to EO S-3-05, the California Legislature passed AB 32, the California Global Warming Solutions Act of 2006, enacting Health and Safety Code Sections 38500–38599. AB 32 required CARB to set an emissions cap, adopt rules to reduce GHG emissions to 1990 levels by 2020, and prepare a 2009 plan identifying reductions from major GHG sources through regulations, market mechanisms, and other actions.

In 2008, CARB estimated statewide GHG emissions at 427 MMT CO2E in 1990 and projected 596 MMT CO2E by 2020 under business-as-usual (BAU) conditions. CARB determined that meeting AB 32 required reducing BAU emissions by 169 MMT CO2E, or about 28.5 percent. A 2010 update reflecting the recession lowered the 2020 BAU forecast by 55 MMT CO2E, reducing the needed cut to 21.7 percent. California achieved its 2020 goal.

Approved in September 2016, Senate Bill (SB) 32 updated the California Global Warming Solutions Act and enacted EO B-30-15 by requiring statewide GHG emissions to fall 40 percent below 1990 levels by 2030, or about 260 MMT CO2E. CARB must prioritize reductions while considering the social costs of GHG emissions, including economic damages related to agriculture, public health, climate adaptation, flood risk, and energy systems.

Climate Change Scoping Plan

As required by the California Global Warming Solutions Act of 2006, CARB adopted the *Climate Change Scoping Plan: A Framework for Change* in 2008 to identify strategies for reducing 2020 forecasted BAU emissions to 1990 levels (CARB, 2008). In 2017, CARB released the *2017 Climate Change Scoping Plan Update*, which identified strategies to meet SB 32's 2030 GHG reduction target, building on programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, RPS, SCS, Short-Lived Climate Pollutant Reduction Strategy, and Cap-and-Trade Program, while adding policies for natural and working lands (CARB 2017). Adopted in December 2022, the *2022 Scoping Plan Update for Achieving Carbon Neutrality* assesses progress toward the 2030 target and outlines a path to carbon neutrality and an 85 percent reduction in anthropogenic GHG emissions below 1990 levels by 2045, as directed by AB 1279. It includes strategies for clean technology, energy, natural and working lands, and related priorities supporting California's long-term climate, economic, environmental justice, energy security, and public health goals.

Senate Bill 375

SB 375, the 2008 Sustainable Communities and Climate Protection Act, was signed into law in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan. The purpose of SB 375 is to align regional transportation planning efforts, regional GHG reduction targets, and fair-share housing allocations under state housing law. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a SCS or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO's Regional Transportation Plan. SCAG is the region's MPO. In 2018, CARB set targets for the SCAG region of an 8 percent reduction in GHG emissions per capita from automobiles and light-duty

trucks compared to 2005 levels by 2020 and a 19 percent reduction by 2035. These targets are periodically reviewed and updated.

Renewables Portfolio Standard

The Renewables Portfolio Standard (RPS) promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. SB 350 (2015) increased California's renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030. SB 1020 (2022) again revised the policy establishing the RPS goal of 90 percent by the end of 2035, 95 percent by the end of 2040, and 100 percent by the end of 2045. SB 1020 also broadened the applicability of electricity sources eligible under RPS to include "zero carbon resources," which allows for large hydroelectric sources to be considered toward RPS procurement targets.

Title 24 – California Building Code

The California Code of Regulations (CCR), Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to GHG reductions are the CBC's energy efficiency and green building standards, as outlined below.

Part 6 – Energy Efficient Standards

The California Code of Regulations, Title 24, Part 6 is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code). This code, originally enacted in 1978, establishes energy-efficiency standards for residential and nonresidential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficient technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current 2025 Title 24 Building Energy Efficiency Standards went into effect on January 1, 2026. The 2025 Energy Code builds on previous versions and expands the use of heat pumps in newly constructed residential buildings, encourages electric readiness, and strengthens ventilation standards. New construction and major renovations must demonstrate their

compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope.

Part 11 – Green Building Standards

The California Green Building Standards Code, referred to as 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 CBC). The current 2025 CALGreen standards became effective January 1, 2026. CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of nonresidential and residential structures. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements. The mandatory measures are related to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen also includes two tiers of residential and nonresidential voluntary measures that encourage local jurisdictions to raise the sustainability goals: Tier 1 adds additional requirements beyond the mandatory measures, and Tier 2 further increases the requirements.

Similar to the reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen mandatory requirements must be demonstrated through completion of compliance forms and worksheets.

4.6.2.3 Regional

Imperial County Regional Climate Action Plan

The Imperial County Regional Climate Action Plan (Regional CAP) was prepared to address the impacts of climate change and reduce GHG emissions in the Imperial Valley region, which includes the County and its seven incorporated cities. The Regional CAP is consistent with statewide legislation and regulatory mandates, and establishes local strategies, measures, and actions aimed at reducing GHG emissions. Reduction targets for the County were established in alignment with SB 32 and EO S-3-05, based on the 2005 GHG inventory and sector-specific targets in the 2017 Scoping Plan. For the City of Calexico, targets include reducing emissions to 39 percent below 2005 levels by 2030 and to 64 percent below 2005 levels by 2050. To meet these targets, the City would need to reduce communitywide emissions to 67,900 MT CO2E by 2030 and 40,527 MT CO2E by 2050.

The Regional CAP inventoried existing emissions within the County and each of its incorporated cities. The results of the countywide emissions inventories are summarized in Table 4.6-3: Imperial Valley Regional GHG Emissions Inventory, and the GHG inventory for the City is summarized in Table 4.6-4: City of Calexico GHG Emissions Inventory. As shown in Table 4.6-3: Imperial Valley Regional GHG Emissions Inventory, agricultural-related GHG emissions contributed the most countywide, and as shown in Table 4.6-4: City of Calexico GHG Emissions Inventory, energy- and transportation-related GHG emissions contributed the most within the City.

Table 4.6-3: Imperial Valley Regional GHG Emissions Inventory

Emissions Sector	2005		2012		2018		
	MT CO_2E[1]	% Total	MT CO_2E[1]	% Total	MT CO_2E[1]	% Total	% Change from 2005
Transportation	656,655	16.3 %	650,729	17.3 %	748,111	19.7 %	+13.9%
Energy	1,006,987	25.1 %	757,037	20.2 %	484,863	12.8 %	-51.9%
Water	28,114	0.7%	30,158	0.8%	34,291	0.9%	+22.0%
Solid Waste	218,847	5.4%	132,773	3.5%	148,337	3.9%	-32.2%
Agriculture	2,081,481	51.8 %	2,155,325	57.4 %	2,354,168	61.9 %	+13.1%
Propane	13,698	0.3%	14,856	0.4%	19,112	0.5%	+39.5%
Calexico POE[2]	12,649	0.3%	12,649	0.3%	12,649	0.3%	0.0%
Total[3]	**4,018,430**	**100%**	**3,753,527**	**100%**	**3,801,531**	**100%**	**-5.4%**

SOURCE: Imperial County, 2021.
NOTE: Totals may vary due to independent rounding.
[1]MT CO_2E = metric tons of carbon dioxide equivalent.
[2]Data for emissions at the ports of entry (POEs) was only available for 2015. For purposes of this inventory, emissions estimates from 2015 were assumed constant for each inventory year. Emissions from POEs are not apportioned to individual jurisdictions.
[3]Electricity consumption associated with potable water treatment and delivery is not included in this total, as data for this activity was not available for unincorporated County.

Table 4.6-4: City of Calexico GHG Emissions Inventory

Emissions Sector	2005		2012		2018		
	MT CO_2E	% Total	MT CO_2E	% Total	MT CO_2E	% Total	% Change from 2005
Transportation	97,757	33.3%	81,409	36.2%	96,471	43.9%	-1.3%

Energy	163,209	55.7%	122,163	54.3%	88,774	40.4%	-45.6%
Water	5,651	1.9%	4,839	2.2%	6,750	3.1%	+19.4%
Solid Waste	24,474	8.3%	14,388	6.4%	25,479	11.6%	+4.1%
Agriculture	2,020	0.7%	2,092	0.9%	2,284	1.0%	+13.1%
Total[1]	**293,192**	**100%**	**224,891**	**100%**	**219,758**	**100%**	**-25.0%**

SOURCE: Imperial County 2021.
NOTE: Totals may vary due to independent rounding.
[1]MT CO_2E = metric tons of carbon dioxide equivalent.

Connect SoCal 2024, Regional Transportation Plan/Sustainable Communities Strategy

In April 2024, SCAG adopted Connect SoCal 2024, the Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS). The horizon year for Connect SoCal 2024 is 2050. The Connect SoCal plan identifies land use strategies that focus on new housing and job growth in areas with a variety of destinations and mobility options that would support and complement the proposed transportation network. The overarching strategy in Connect SoCal is to provide for a plan that allows the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG, 2024). The Connect SoCal plan contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as projected development that promotes active transport and reduces GHG emissions.

4.6.3 Significance Determination Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to GHG emissions would be significant if the Housing Element Rezone Program would:

1) Threshold 1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2) Threshold 2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

CEQA Guidelines Section 15064.4 states that "the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the

amount of greenhouse gas emissions resulting from a project." Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2) Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

As stated in the CEQA Guidelines, these questions are "intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance" (Title 14, Division 6, Chapter 3 Guidelines for Implementation of the CEQA, Appendix G, Environmental Checklist Form). The CEQA Guidelines encourage lead agencies to adopt regionally specific thresholds of significance. When adopting these thresholds, the amended Guidelines allow lead agencies to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence.

4.6.4 Methodology

The project site is in the Salton Sea Air Basin, where ICAPCD regulates air quality. Neither the County nor ICAPCD has adopted a GHG significance threshold for land development projects. CEQA Guidelines Section 15064(h)(1) requires lead agencies to consider whether cumulative impacts are significant and whether a project's incremental effects are cumulatively considerable. Therefore, this analysis evaluates significance using criteria (1) and (3) above, considering future development's consistency with long-term State GHG reduction goals and applicable plans, including the 2022 Scoping Plan, RTP/SCS, and Regional CAP. For this program-level analysis, GHG emissions were calculated for project buildout and compared to existing conditions and adopted land use and zoning buildout.

GHG emissions for future housing sites were also compared to a project-level screening threshold. Because the County has no adopted GHG threshold, future development may be evaluated using SCAQMD recommendations, which apply within the SCAG region that includes Imperial County and several regional air districts.

In 2008, SCAQMD convened a Working Group to develop GHG thresholds for land use projects. Although the SCAQMD Board has not adopted them, the draft guidance provides

substantial evidence that lead agencies may consider when adopting thresholds. The current interim thresholds use the following tiered approach (SCAQMD 2008, 2010):

- Tier 1 – The project is CEQA-exempt.
- Tier 2 – The project is consistent with a qualifying regional or local GHG reduction plan.
- Tier 3 – Project GHG emissions are below, or mitigated below, applicable screening levels:
    - Residential/commercial screening levels
        - Option 1: 3,000 MT CO2E for all residential/commercial uses
        - Option 2: Land use–specific thresholds, if applied consistently:
            - Residential: 3,500 MT CO2E
            - Commercial: 1,400 MT CO2E
            - Mixed-use: 3,000 MT CO2E
            - Permitted industrial: 10,000 MT CO2E
- Tier 4 – The project meets performance standards, such as:
    - Option 1: Percent reduction target; SCAQMD has not recommended this approach.
    - Option 2: Early implementation of Scoping Plan measures, now folded into Option 3.
    - Option 3: SCAQMD efficiency targets.
        - 2020: 4.8 MT CO2E per service population for project-level analyses or 6.6 MT CO2E for plan-level analyses.
        - 2035: 3.0 MT CO2E per service population for project-level analyses or 4.1 MT CO2E for plan-level analyses.
- Tier 5 – Offsets may be used alone or with the screening level and must cover a 30-year project life unless limited by permit, lease, or other binding condition.

GHG emissions were calculated using the CalEEMod Version 2022.1.44 (CAPCOA 2022). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. CalEEMod can be used to calculate emissions from mobile (on-road vehicles), energy (electricity and natural gas), area (landscape maintenance equipment), water and wastewater, solid waste sources, stationary sources, and refrigerants. GHG emissions are estimated in terms of total MT CO_2E. The analysis methodology and input data are described further in Appendix G of this DEIR. Where project-specific data was not available, model inputs were based on information provided in the CalEEMod User's Guide (CAPCOA, 2022).

4.6.5 Issue 1: GHG Emissions

Would the project result in GHG emissions that may have a significant impact on the environment?

4.6.5.1 Impact Analysis

The analysis of the project's GHG emissions is based on the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting. Buildout of both the existing and the proposed land use and zoning designations would result in an increase in GHG emissions when compared to the existing on-the-ground conditions (Appendix G of this DEIR). This is because all the housing sites are currently undeveloped or underdeveloped. However, when considering the total buildout of the housing sites, the project would result in a reduction in GHG emissions when compared to the adopted land use and zoning designations. This is due to the decrease in trip generation, which is primarily attributed to the Rezone Sites where the rezoning proposes a change in land use from commercial to residential, as commercial uses are typically more intensive and generate a higher number of trips within a site than residential uses. However, as GHG emissions would increase compared to the existing baseline condition, GHG emissions would be considered significant.

The project does not propose the construction of new housing or other development; rather it provides capacity for future development consistent with the RHNA. This analysis also considers future development of the individual housing sites in comparison to a screening level threshold of 3,000 MT CO2E per year as recommended by the SCAQMD. As a part of the Air Quality Analysis prepared for the project (Appendix C of this DEIR), emissions were calculated for the following:

- Multi-family development at Site 3, which represents the greatest number of units and trips of all the 53 housing sites;
- Single-family development at Site 18, which represents the greatest number of units and trips of all the By-Right Development Sites;

Table 4.6-5: Residential GHG Emissions, summarizes the total GHG emissions associated with these sites, the GHG emissions per housing unit, and the number of housing units that would result in emissions less than 3,000 MT CO2E per year.

Table 4.6-5: Residential GHG Emissions

	Multi-Family Residential (Site 3)	Single Family Residential (Site 18)
Total GHG Emissions (MT CO_2E per year)	10,159	5,659

Housing Units	1,200	380
GHG Emissions per Unit (MT CO_2E per year)	8.47	14.89
Maximum Number of Units That Results in Less Than 3,000 MT CO_2E per Year	354	201
SOURCE: Appendix G Greenhouse Gas Analysis. NOTE: Totals may vary due to independent rounding.		

As shown in Table 4.6-5: Residential GHG Emissions, any individual development that proposes more than 201 single-family units or more than 354 multi-family units would have the potential to exceed 3,000 MT CO2E per year. These GHG emission calculations are representative only, as no specific development is proposed at this time and project-level details are unknown. Based on this screening criteria, there are four (4) By-Right Development Sites (Sites 9, 12, 18, and 25) and three (3) Discretionary Development Sites (Sites 2, 3, and 24a) that could result in GHG emissions that exceed 3,000 MT CO2E per year. Additionally, industrial development at the Bowker Site could result in GHG emissions that exceed 3,000 MT CO2E per year.

GHG impacts associated with the Discretionary Development Sites and By-Right Development Sites that propose more than 201 single-family units or more than 354 multi-family units, or propose any other development that exceeds 3,000 MT CO2E per year, would be potentially significant.

Project-specific GHG emission impacts would be addressed at the time development is proposed. For By-Right Development Sites, applicable requirements consistent with the protections established by mitigation measures AQ-1 through AQ-3 would be incorporated into and implemented through the City's ministerial review process for by-right housing development, as established pursuant to Program 2E of the Housing Element. If necessary, GHG reduction measures would be implemented. The level to which GHG emissions would be reduced in unknown at this time; thus, GHG impacts would be potentially significant.

4.6.5.2 Mitigation Framework

The following mitigation measure is recommended for future development proposals:

MM GHG-1: For Discretionary Development, applications for future development, wherein the City of Calexico (City) or their designee has determined a potential for greenhouse gas (GHG) impacts, the City shall evaluate the project to identify the potential for GHG emissions to exceed the South Coast Air Quality Management District (SCAQMD) thresholds detailed below. If a project may exceed the thresholds, the City shall require a technical assessment evaluating potential project GHG impacts to the City for review and approval. The

significance of project-level GHG impacts shall be evaluated using one of the following criteria:

1. In the absence of a City plan to reduce GHG emissions, the evaluation shall be prepared in conformance with SCAQMD methodology for assessing GHG impacts, which consists of the following tiered approach:
    a. Tier 1 – The project is exempt from the California Environmental Quality Act.
    b. Tier 2 – The project is consistent with an applicable regional GHG emissions reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
    c. Tier 3 – Project GHG emissions represent an incremental increase below or mitigated to less than a 3,000 metric tons of carbon dioxide equivalent screening level.
    d. Tier 4 – The project achieves performance standards, where performance standards may include a percent emission reduction target or an efficiency target per service population.
    e. Tier 5 – Offsets along or in combination with the above the target Significance Screening Level. Offsets must be provided for a 30-year project life, unless the project life is limited by permit, lease, or other legally binding condition.

If GHG emissions are determined to have the potential to exceed the SCAQMD's recommended thresholds, the City shall require that applicants for new development projects incorporate features to reduce GHG emissions. These identified measures shall be incorporated into all appropriate documents submitted to the City and shall be verified by the City. Measures can include, but are not limited to, the following:

- **Affordable Housing**. Provide below-market-rate housing that reduces VMT.
- **Electric Vehicle Parking**. Implement electric vehicle charging infrastructure beyond requirements set forth in the 2025 California Green Building Standards Code mandatory measures, such as Tier 2 voluntary measures set forth in the 2025 California Green Building Standards Code (or future more stringent) standards.
- **Transportation Demand Management**. Implementation of transportation demand management measures.
- **Unbundling Parking**. Require residential developers to separate the cost to rent or purchase a parking space from the cost of the unit.
- **Transit Subsidies**. Require implementation of a transit subsidy program that covers a portion of the cost of transit passes on a per-unit basis to residential tenants for a period of five years after issuance of the first occupancy permit. The Owner/Permittee shall provide an annual report to the City Engineer in each of the first five years

demonstrating how the offer was publicized to residents and documenting the results of the program each year, including the number of participants and driveway traffic counts.

- **Commute Trip Reduction Program**. Develop and implement a commute trip reduction program that requires each homeowner and tenant to be provided with a one-page flyer every year that provides information regarding available transit, designated bicycle routes, local bicycle groups and programs, local walking routes and programs, and rideshare programs.
- **Active Transportation Network**. Expand and facilitate completion of planned networks of active transportation infrastructure for projects that are required to provide public improvements related to that infrastructure.
- **Bicycle Micro-mobility Fleet**. Provide bicycles to the first buyer of each unit.
- **All Electric Development**. Require all-electric development with no sources of natural gas.
- **Energy Efficiency**. Demonstrate building energy efficiency beyond applicable code requirements.
- **Energy Star Appliances**. Provide Energy Star-rated appliances (e.g., clothes washers, dishwashers, refrigerators, and ceiling fans).
- **Alternative Water Heating**. Incorporate non-gas water heaters (e.g., electric or solar water heating).
- **Water-Efficient Landscaping**. Provide low-water use/drought tolerant plant species with low water use irrigation (e.g., spray head or drip), where required.
- **Outdoor Electrical Outlets to Allow for Electric Landscape Equipment**. Provide exterior electrical outlets necessary for sufficient powering of electric lawnmowers and other landscaping equipment.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

4.6.5.3 Significance After Mitigation

Although buildout of the project would result in a decrease in GHG emissions when compared to buildout of the adopted land use and zoning designations, implementation of the project would still facilitate new development that would generate GHG emissions above existing baseline conditions. Specifically, future individual development could generate GHG emissions that exceed project-level thresholds. Project-specific GHG emission impacts would be evaluated and addressed consistent with mitigation measure **MM GHG-**

1. However, because the design and operational characteristics of future development projects are not currently known, the level to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, despite the overall reduction in emissions compared to the adopted land use plan, after mitigation, program-level GHG impacts associated with emission levels would remain **significant and unavoidable**.

4.6.6 Issue 2: Policies, Plans, and Regulations Intended to Reduce GHG Emissions

Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

4.6.6.1 Impact Analysis

State GHG emissions reduction policy was established by EOs S-3-05 and B-30-15 and was subsequently codified by AB 32 and SB 32. EO S-3-05 established GHG emission reduction targets of year 2000 GHG emission levels by 2010, year 1990 GHG emission levels by 2020, and 80 percent below year 1990 levels by 2050. EO B-30-15 established an interim GHG emission reduction target of 40 percent below year 1990 levels by 2030. AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which has been achieved. As required by SB 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The project was evaluated for consistency with the 2022 Scoping Plan, the Regional CAP, and Connect SoCal 2024.

2022 Scoping Plan

AB 1279, the California Climate Crisis Act, established statewide targets of (1) net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter; and (2) to ensure that by 2045, anthropogenic GHG emissions are reduced 85 percent below 1990 levels by 2045. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D of the 2022 Scoping Plan includes local actions that jurisdictions may take to reduce GHG emissions in line with AB 1279 reduction targets. The following are key project attributes for residential and mixed-use projects that can be used to qualitatively determine consistency with the 2022 Scoping Plan. A summary of the 2022 Scoping Plan Priority Strategies and the project's consistency with those strategies is provided in Table 4.6-6: Project Consistency

with 2022 Scoping Plan Key Prioritization Strategies. As demonstrated, the project would be consistent or partially consistent with some, but not all, of the 2022 Scoping Plan key prioritization strategies. As no specific development is proposed at this time, consistency with all 2022 Scoping Plan measures is unknown.

Table 4.6-6: Project Consistency with 2022 Scoping Plan Key Prioritization Strategies

Priority Area	Key Project Attribute	Project Consistency
Transportation Electrification	Provides electric vehicle charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in CALGreen the time of project approval.	Inconsistent. Future development would be required to comply with the mandatory electric vehicle parking requirements of CALGreen. However, as discussed in Section 4.6.2.2, CALGreen includes two tiers of voluntary measures that encourage local jurisdictions to raise sustainability goals: Tier 1 and Tier 2. This measure recommends that projects meet the most ambitious voluntary standard in CALGreen at the time of approval. As these are voluntary standards that go beyond mandatory requirements, implementation cannot be guaranteed at this level of analysis.
Vehicle Miles Traveled Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	Consistent. The project would promote land use patterns and housing programs that would facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services.
	Does not result in the loss or conversion of natural and working lands.	Partially Consistent. Some of the housing sites are currently used as agricultural uses; however, all housing sites are largely undeveloped and underutilized.
	• Consists of transit-supportive densities (minimum of 20 residential	Partially Consistent. The project would increase residential densities consistent with this measure. However, not all sites are located in proximity to existing transit stops.

	dwelling units per acre); or • Is in proximity to existing transit stops (within a half mile); or • Satisfies more detailed and stringent criteria specified in the region's SCS.	
	Reduces parking requirements by: • Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or • Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or • For multi-family residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	Consistency Unknown. No specific development is proposed at this time. Parking requirements for future development are unknown.
	At least 20 percent of units included are affordable to lower-income residents.	Consistent. For the 2021–2029 planning period, the City is allocated a total of 4,868 units, including 1,279 units affordable to very low-income households and below, 655 units

		affordable to low-income, 614 units affordable to moderate-income, and 2,320 units affordable to above moderate (market-rate) income households.
	Results in no net loss of existing affordable units.	Consistent. The project would not result in the loss of existing affordable units. The housing sites currently consist of only one single family residential unit.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	Inconsistent. No specific development is proposed at this time. Natural gas within the City is provided by Southern California Gas. As of July 1, 2024, the California Public Utilities Commission eliminated subsidies for new construction projects that use natural gas or propane. Additionally, Title 24 incentivizes all-electric development consistent with statewide GHG reduction goals. However, the construction of all-electric development with no reliance on natural gas cannot be guaranteed at this level of analysis.

SOURCE: CARB, 2022.

Regional Climate Action Plan

Table 4.6-7: Regional CAP GHG Reduction Measures, summarizes the project consistency with the Regional CAP GHG reduction measures. As demonstrated, the project would be consistent or partially consistent with all applicable measures.

Table 4.6-7: Regional CAP GHG Reduction Measures

Number	Measure Description	Consistency
Transportation Measures		
T-1.1[1]	Create a ridesharing program for agricultural workers modeled after the Green Raiterios program in the San Joaquin Valley.	Not Applicable. The project does not involve agricultural workers.
T-1.2	Plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools, commercial/retail, employment centers, health care	Consistent. The Circulation Element of the City's General Plan includes objectives and policies related to pedestrian and bicycle facilities. Policy 6 requires that all urban standard streets have improved sidewalks on both sides of the road and

	service facilities, public transportation, and other points of interest.	that rural streets that lead to schools or bus stops have improved sidewalks on one side of the road. Policy 7 requires implementation of the Bicycle Master Plan. The internal street design of all future housing sites would include sidewalks and roads that would connect to the adjacent circulation and pedestrian facilities as required by the City.
T-1.4	Adopt Complete Street Ordinances to ensure streets and roads are designed and operated as a balanced, multimodal transportation network that enables safe access for all users.	Consistent. The City's General Plan Circulation Element includes a goal that the circulation system should promote the safe, efficient movement of people, goods, and vehicles. Future internal street designs of the housing sites would be constructed in accordance with City standards and would include sidewalks and roads that would connect to the adjacent circulation and pedestrian facilities.
T-1.5	Adopt zoning changes that encourage higher density mixed use development in incorporated cities.	Consistent. The project would directly implement this measure by encouraging higher density residential uses on underutilized sites throughout the City.
T-2.1[2]	Require projects with loading docks to provide electric outlets to power truck refrigeration units rather than allow trucks to idle while unloading.	Consistent. The housing sites would not include loading docks. The Bowker Site would allow for the development of a future industrial use; however, it is a Discretionary Development Site that would undergo further environmental review at the time that development is proposed.
T-2.2	Synchronize traffic signals to reduce idling.	Not Applicable. This measure is the responsibility of the City and is outside the purview of the project.
T-2.4	Work with the air district to establish an incentive program to trade in fossil fuel-powered landscaping equipment with electric versions.	Not Applicable. This measure is the responsibility of the City and is outside the purview of the project.

T-3.1	Transition to a more fuel-efficient municipal vehicle fleet.	Not Applicable. This measure is the responsibility of the City and is outside the purview of the project.
T-3.2	Install public electric vehicle charging stations.	Not Applicable. This measure is the responsibility of the City and is outside the purview of the project. However, future development on the housing sites would provide electric vehicle charging infrastructure in accordance with the 2025 CALGreen.
T-3.3	Require electric vehicle charging stations at new non-residential developments.	Consistent. The Bowker Site would allow for the development of a future industrial use; however, it is a Discretionary Development Site that would undergo further environmental review at the time that development is proposed.
T-3.4	Explore local "cash for clunkers" or similar incentive programs that provide access to new or used zero emission on-road vehicles.	Not Applicable. This measure is the responsibility of the City and is outside the purview of the project.
Energy Measures		
E-1.1	Require new residential developments to install alternatively powered water heaters.	Consistent. Future residential development would be constructed in accordance with the mandatory requirements of 2025 Title 24 and 2025 CALGreen, at a minimum. These codes, which went into effect January 1, 2026, include requirements for heat pump water heaters that use clean electricity to heat water.
E-1.3	Reduce or eliminate natural gas and propane consumption in new and existing residential buildings.	Partially Consistent. No specific development is proposed at this time. Natural gas within the City is provided by Southern California Gas. As of July 1, 2024, the California Public Utilities Commission eliminated subsidies for new construction projects that use natural gas or propane. Additionally, Title 24 incentivizes all-electric development consistent with statewide GHG reduction goals. The construction of all-electric

		development with no reliance on natural gas cannot be guaranteed at this level of analysis. Thus, it is unknown if natural gas would be eliminated; however, it would be reduced.
E-1.5	Require major renovations to incorporate energy efficiency measures.	Not Applicable. The project does not involve renovations of existing buildings.
E-2.3	Require large parking lots for new commercial development projects to include solar canopies to produce on-site renewable energy and provide shading for energy efficiency benefits.	Not Applicable. The project does not include commercial development.
E-2.4	Supply municipal facilities with on-site renewable electricity.	Not Applicable. The project does not include municipal facilities.
E-2.5	Adopt a reach code to require new commercial developments to achieve zero net energy.	Not Applicable. The project does not include commercial development nor would it interfere with the City adopting a zero net energy code.
E-2.6	Establish or join program to increase grid-supply renewable and zero-carbon electricity.	Consistent. The project would be served by the Imperial Irrigation District, which has achieved renewable energy goals consistent with RPS (see Section 4.6.2.2).
Waste Measures		
WS-1.1	Provide recycling and composting receptacles and use of biodegradable or recycled-material products at municipal facilities and events, where feasible.	Consistent. Although the project does not include municipal facilities or events, the project would be consistent with City recycling and composting goals. Allied Waste (Republic Services) is currently under contract with the City to collect garbage, recycling, and yard waste, and would provide service to future development. Future development would also be required to comply with the requirements of Municipal Code Chapter 8.36 – Solid Waste Disposal.
WS-1.2	Promote alternative uses of agricultural and organic waste by promoting the construction of composting and anaerobic digestion facilities.	Consistent. State law requires that all residents recycle organic materials through a mandatory organic recycling program. The project would not interfere with the construction of composting or anaerobic digestion facilities. Future

		development would also be required to comply with the requirements of Municipal Code Chapter 8.36 – Solid Waste Disposal.
WS-1.3	Create waste diversion ordinances for construction projects.	Consistent. Municipal Code Chapter 8.38 is the Mandatory Construction and Demolition Debris Recycling Program. All construction waste associated with the future development would be recycled in accordance with City requirements.
Agriculture Measures		
AG-1.1	Work with utilities and/or air districts to provide incentives such as CARB's FARMER program to convert stationary diesel- or gas-powered irrigation pumps to electric pumps that are connected to the grid or use off-grid alternative/renewable energy sources, such as solar.	Not Appliable. The project does not include irrigation pumps.
AG-1.2	Work with utilities, dairies, ranches, and others to expedite permitting and promote energy generation, flaring, and methane capture systems at manure management facilities at cattle ranches and dairy farms.	Not Applicable. The project does not include cattle ranches or dairy farms.
AG-1.3	Provide incentives for replacing gas- or diesel-powered agricultural equipment with electric or alternatively-fueled equivalents.	Not Applicable. The project does not include agricultural equipment.
AG-1.5	Work with farmers to either reduce or replace the use of synthetic nitrogen-based fertilizers with compost alternatives.	Not Applicable. The project does not include the use of synthetic nitrogen-based fertilizers.
AG-2.2	Target stream restoration programs and riparian restoration strategies for carbon sequestration, natural heat relief, water quality improvements, and/or wildlife habitat mitigation.	Not Applicable. The project does not include streams or riparian areas. Future development would include tree planting consistent with City requirements that would provide carbon sequestration and heat relief.

AG-2.4	Develop and enforce landscape tree requirement for new developments.	Consistent. Future development would include tree planting consistent with City requirements.
SOURCE: Imperial County 2021. [1]Measure applicable to County of Imperial only. [2]Measure applicable to City of Calexico only.		

Connect SoCal 2024

Table 4.6-8: Project Consistency with Connect SoCal Strategies, summarizes the project consistency with the Connect SoCal GHG reduction strategies. As demonstrated in Table 4.6-8: Project Consistency with Connect SoCal Strategies, the project would be generally consistent with all Connect SoCal strategies.

Table 4.6-8: Project Consistency with Connect SoCal Strategies

Goal	Policies/Strategies	Project Consistency
Mobility: Build and maintain an integrated multimodal transportation network		

Goal	Policies/Strategies	Project Consistency
• Support investments that are well maintained and operated, coordinated, resilient, and result in improved safety, improved air quality, and minimized GHG emissions. • Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. • Support planning for people of all ages, abilities, and backgrounds.	• System Preservation and Resilience – Maintain the operational efficiency of the transportation system. • Complete Streets – Support the safety, comfort, and mobility for all road users. • Transit and Multimodal Integration – Support more seamless connections across modes, especially via first/last mile connection; those occurring between transit/rail and biking, walking, or rolling; and ensuring platforms exist to facilitate trip planning and payments. • Transportation Systems Management – Maximize the functional capacity and efficiency of the existing transportation system. • Transportation Demand Management – Reduce the demand for roadway travel, particularly during peak times or on congested routes.	Consistent. The project would not conflict with these policies and strategies. The project encourages development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes. The City's General Plan Circulation Element includes a goal that the circulation system should promote the safe, efficient movement of people, goods and vehicles. Future internal street designs of the housing sites would be constructed in accordance with City standards and would include sidewalks and roads that would connect to the adjacent circulation and pedestrian facilities. The project would not conflict with SCAG's efforts to achieve these goals.
Communities: Develop, connect and sustain livable and thriving communities		

Goal	Policies/Strategies	Project Consistency
• Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances. • Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	• Priority Development Areas – Locate new households and jobs where people have opportunities for alternative modes of transportation or to take short trips. • Housing the Region – Provide sufficient housing opportunities throughout the region. • 15-Minute Communities – Provide to all basic, day-to-day needs, services, and amenities within a 15-minute walk, bike, or roll from one's home . • Equitable Engagement and Decision-Making – Strive for more equitable engagement and decision-making.	Consistent. The project would directly implement the goal of producing diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households. For the 2021–2029 planning period, the City is allocated a total of 4,868 units, including 1,279 units affordable to very low-income households and below, 655 units affordable to low-income, 614 units affordable to moderate-income, and 2,320 units affordable to above moderate (market-rate) income households. The project promotes land use patterns and housing programs that support affirmatively furthering fair housing, including increased access to housing opportunities and resources for all segments of the community, including persons with special needs. It would promote land use patterns and housing programs that would facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services.
Environment: Create a healthy region for the people of today and tomorrow		

Goal	Policies/Strategies	Project Consistency
• Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change. • Integrate the region's development pattern and transportation network to improve air quality, reduce GHG emissions, and enable more sustainable use of energy and water. • Conserve the region's resources.	• Sustainable Development – Support quality of life and economic growth for the region's present and future populations by ensuring that essential resources, such as water, energy, and food supply, are responsibly managed. • Air Quality – Achieve emission reductions by providing a comprehensive and coordinated regional solution with integrated land use and transportation planning. • Clean Transportation – Transition to cleaner vehicles, both in transit fleets and for trucks and passenger vehicles, to support cleaner air quality. • Natural and Agricultural Land Preservation – Preserve natural and agricultural lands. • Climate Resilience – Provide regional coordination and solutions finding related to climate change's adverse impacts on the natural, social, economic, and built environment, including transportation systems.	Consistent. Through the provision of affordable housing, the project would support a healthy and balanced community. The City has established a housing loan program to support housing rehabilitation for low-income homeowners. The program is designed to improve the housing of low- and moderate-income persons in a manner that addresses health and safety concerns, conserves the existing housing stock, and contributes to neighborhood revitalization and preservation. The project would promote land use patterns and housing programs that would facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services. Future development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy-efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region		

Goal	Policies/Strategies	Project Consistency
• Improve access to jobs and educational resources. • Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air, and quality of life for our communities.	• Goods Movement – Support the efficient movement of goods, which depends directly on the physical transportation infrastructure. • Broadband – Support digital infrastructure, which includes middle-mile physical infrastructure to connect to global networks and last-mile connections by local carriers. • Universal Basic Mobility – Provide qualified residents with subsidies for transit and other mobility services. • Workforce Development – Educate and train individuals to meet the needs of current and future businesses and industry in order to maintain a sustainable and competitive economic environment. • Tourism – Support the travel of not just those visiting from outside the region but also from within the region to reach the region's many destinations and attractions.	Consistent. The project would provide additional housing to the region that would improve access to local jobs and educational resources. It would promote land use patterns and housing programs that would facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services. The project does not contain policies specifically related to goods movement; however, the City is an important gateway for international goods movement through the U.S./Mexico international border crossing at the City's southern boundary.
SOURCE: SCAG, 2024.		

As shown in Tables 4.6.6 through 4.6.8 above, the project would be consistent or partially consistent with some but not all of the 2022 Scoping Plan key prioritization strategies, Regional CAP GHG reduction measures, and Connect SoCal strategies. However, because the project is a program-level planning document and does not propose specific development at this time, consistency with all applicable GHG reduction measures and implementation strategies cannot be determined. Although buildout of the project would result in a decrease in GHG emissions when compared to buildout of the adopted land use and zoning designations, implementation of the project would facilitate new development

that would generate GHG emissions greater than the baseline condition. In addition, future individual development could generate GHG emissions that exceed project-level thresholds. Thus, impacts associated with conflicts with applicable plans, policies, and regulation adopted for the purpose of reducing the emission of GHGs would be significant.

4.6.6.2 Mitigation Framework

Impacts associated with applicable plans, policies, and regulations intended to reduce GHG emissions adopted for the purpose of reducing the emission of GHGs would be significant. Refer to Section 4.6.5.2 above for Mitigation Measure **MM GHG-1** to reduce impacts to policies, plans, and regulations.

4.6.6.3 Significance After Mitigation

Although future development would be required to evaluate and reduce project-specific GHG emissions consistent with **MM GHG-1** as described above in Section 4.6.5.2, because the design and operational characteristics of future development projects are unknown, the extent to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, after mitigation, program-level GHG impacts would remain **significant and unavoidable**.

4.7 Hazards and Hazardous Materials

This section analyzes potential impacts to hazards and hazardous materials that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

Specifically, this section addresses potential environmental impacts related to hazardous materials, referring to both hazardous materials and hazardous waste, as well as safety hazards from proximity to airports, emergency response, and evacuation. It is based on secondary source information including public hazardous materials databases as detailed below, adopted fire hazard mapping, and the Imperial County Airport Land Use Compatibility Plan. Other hazards are addressed in the following sections: geologic and seismic hazards (Section 4.5, Geology and Soils); flood hazards (Section 4.8, Hydrology and Water Quality); noise exposure (Section 4.10, Noise); and wildfire (Section 4.15, Wildfire).

4.7.1 Existing Conditions

Hazardous materials in Imperial County primarily result from the agricultural economy, proliferation of fuel tanks and transmission facilities, an intricate canal system, and the confluence of major surface arteries and rail systems (Imperial County, 2021).

Hazardous materials are used in the City of Calexico for a variety of purposes including manufacturing, service industries, small businesses, agriculture, medical clinics, schools, and households.

4.7.1.1 Known Hazardous Materials Sites

Hazardous Waste and Substances Sites (EnviroStor Database)

The California Department of Toxic Substances Control (DTSC) maintains the EnviroStor database, which provides information on sites with known or suspected hazardous substance contamination and sites subject to environmental investigation, cleanup, permitting, or land use restrictions, pursuant to the California Health and Safety Code Section 25256. EnviroStor is one of the primary sources used in the development of the Cortese List, a compilation of hazardous materials sites utilized by state and local agencies to comply with the California Environmental Quality Act (CEQA). The Cortese List identifies properties where hazardous waste, hazardous substances, petroleum releases, or other environmental conditions may pose a risk to public health or the environment. Information contained in EnviroStor includes site location, regulatory status, contaminants of concern,

cleanup activities, and land use controls. The database is commonly used during environmental review to identify sites that may require further investigation or remediation prior to redevelopment.

Underground Storage Tanks (GeoTracker Database)

GeoTracker is an environmental database maintained by the State Water Resources Control Board (SWRCB) that tracks sites with soil or groundwater contamination, leaking underground storage tanks (LUSTs), military cleanup sites, Department of Defense facilities, and other properties subject to water quality investigation or remediation. GeoTracker provides information regarding contaminant releases, site investigations, monitoring wells, cleanup activities, and regulatory oversight. The database serves as a primary source for identifying sites where hazardous materials may have affected soil or groundwater resources and is frequently used during environmental assessments to evaluate potential contamination risks associated with existing or historic land uses.

Database Search Results

An environmental database record search was completed for the City of Calexico. Using the EnviroStor and GeoTracker databases, a total of one active EnviroStor case and nine open GeoTracker cases were identified and are displayed in Figure 4.7-1, Hazardous Materials Sites. These cases include:

EnviroStor

1. **CALEXICO PROPERTY (60002150)** is located at 751 Cesar Chavez Blvd and is listed as 'Active' for State Response.

GeoTracker

1. **7-ELEVEN STORE #23409 (T0602560028)** is located at 904 Imperial Ave and is listed as 'Open – Remediation' for LUST Cleanup site as of 7/30/2007.
2. **CHEVRON STATION #92693 (T0602500034)** is located at 400 Imperial Ave and is listed as 'Open – Assessment & Interim Remedial Action' for LUST Cleanup site as of 7/1/2024.
3. **FORMER CA FUN MART (FIVE BROTHERS FUEL STOP) (T10000009970)** is located at 105 West Cole Blvd and is listed as 'Open – Remediation' for LUST Cleanup site as of 10/3/2025.
4. **FORMER EZ SERVE #100828 (T0602500037)** is located at 940 Imperial Ave and is listed as 'Open – Assessment & Interim Remedial Action' for LUST Cleanup site as of 5/20/2015.

5. **FORMER THRIFTY OIL #426 (T0602500033)** is located at 940 Imperial Ave and is listed as 'Open – Assessment & Interim Remedial Action' for LUST Cleanup site as of 5/20/2015.
6. **SOCO NO.63 (T0602514171)** is located at 800 Imperial Ave and is listed as 'Open – Remediation' for LUST Cleanup site as of 3/30/2017.
7. **UNOCAL SERVICE STATION #3201 (T0602520155)** is located at 324 Imperial Ave and is listed as 'Open – Assessment & Interim Remedial Action' for LUST Cleanup site as of 10/9/2023.
8. **USA GASOLINE STATION #270 (T0602585867)** is located at 824 Imperial Ave and is listed as 'Open – Remediation' for LUST Cleanup site as of 2/17/2016.
9. **USA GASOLINE STATION #295 (T0602558699)** is located at 1036 Imperial Ave and is listed as 'Open – Remediation' for LUST Cleanup site as of 11/12/2015.

As shown in Figure 4.7-1 Hazardous Materials Sites, none of the listed EnviroStor or GeoTracker sites are within or overlap with any of the proposed project housing sites. The Former CA Fun Mart (T10000009970) is located adjacent to housing site 8, however, it does not represent a risk of off-site exposure or hazard based on a review of the GeoTracker case details. The site is an active leaking underground storage tank cleanup case under Regional Water Quality Control Board oversight, and remediation activities are ongoing. Available records indicate that contamination has been adequately contained and is being addressed through existing regulatory programs, and do not indicate that contamination has migrated onto housing site 8. As such, the adjacent remediation is not expected to expose future residents to hazardous materials or otherwise constrain future residential development of housing site 8. As shown in Figure 4.7-1, housing site 48 is the only site to be located on a Voluntary Cleanup Sites, School Cleanup Sites, or Tiered Permit site, however, this site is inactive or needs no further action.

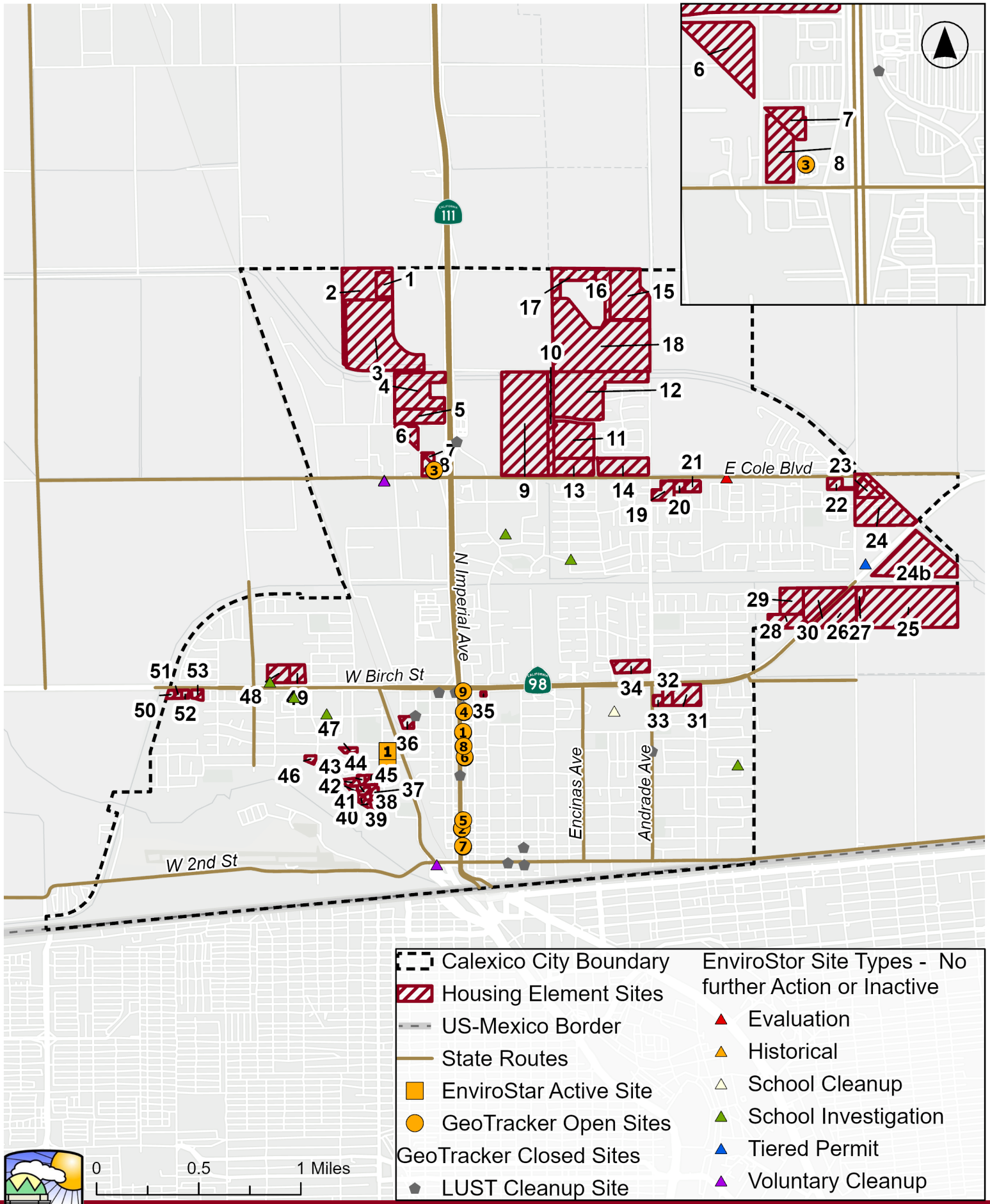


Figure 4.7-1:
Hazardous Materials Sites

4.7.1.2 Known Hazards and Hazardous Materials in Calexico

Agriculture

Residential land uses adjacent to farmlands are potentially subject to health and safety conflicts. Although there is an increase in the number of organic farming operations in the area, which will help to reduce the total amount of pesticides used, Calexico residents will still be subject to hazards associated with pesticide use. The use, storage, and transport of pesticides are strictly regulated by the State of California. The County Agricultural Commission, the California Environmental Protection Agency, and the Department of Pesticide Regulation are the major enforcement agencies responsible for controlling and monitoring pesticide use (Imperial County, 2021).

The New River

Despite extensive efforts in the U.S. and Mexico, water quality in the New River remains out of compliance with many U.S. water quality standards. Water pollution levels pose health and quality of life concerns in Calexico and the Imperial Valley, as well as being sources of pollution to the Salton Sea. Based on the 2021 Imperial County MHMP, the water quality impairments of the New River in the U.S. include low dissolved oxygen, toxicity, pathogens, trash, selenium, sediment/silt, chlordane, DDT, dieldrin, toxaphene, PCBs, HCB, nutrients, mercury, chlorpyrifos, diazinon, copper, and zinc.

Calexico International Airport

The Calexico International Airport is located in the southeastern portion of the City near the United States–Mexico border. The airport is a public-use general aviation facility owned and operated by the City of Calexico and serves private aviation, business aviation, flight training, customs operations, and other general aviation activities. Airport operations are conducted from a single runway oriented generally northwest-southeast. Southeastern portions of the City, including housing sites 36-53, are located within the Airport Influence Area (AIA) established by the Imperial County Airport Land Use Compatibility Plan (ALUCP). The ALUCP identifies compatibility zones intended to minimize exposure to airport-related safety hazards, noise impacts, and airspace conflicts. Development within the Airport Influence Area is subject to applicable airport land use compatibility policies and may require review by the Imperial County Airport Land Use Commission to ensure consistency with adopted safety and compatibility standards.

As shown in Figure 4.7-2 Calexico International Airport Hazard Zones, housing sites 35, 36, 41-53, and portions of sites 37 and 40 are located within Zone 6; housing sites 38, 39, and the remaining portions of sites 37 and 40 are located within the more restricted Zone 3; and housing sites 1 through 34 are in Zone 7: Part 77 Conical Zone. These sites require

consideration of airport compatibility policies related to safety, noise, height restrictions, and overflight activity.

Wildland Fires

Wildland fires represent a potential hazard when development is located near wildland fuels or steep topography. As discussed in Section 4.15, Wildfire, the City of Calexico is located within a highly urbanized and agricultural area of the Imperial Valley where wildfire risk is generally low due to the region's flat topography, mild wind patterns, limited native vegetation, and absence of surrounding wildland fuel sources. However, portions of the City, particularly areas adjacent to the New River corridor, are located within the State-designated Wildland-Urban Interface (WUI) and Moderate Fire Hazard Severity Zone (MFHSZ), where riparian and scrub vegetation may support localized fire activity. As shown in Figure 4.15-1, Fire Hazard Severity Zones, housing sites 37-43 and 50-52 are either completely within or overlap with the MFHSZ.

Industry and Household Hazardous Materials

Hazardous materials may be stored, used, and disposed of throughout the City of Calexico in association with residential, commercial, industrial, agricultural, and airport-related activities. Common hazardous materials include fuels, oils, solvents, cleaning agents, pesticides, fertilizers, compressed gases, and other chemicals used in everyday operations and maintenance activities (Imperial County 2021).

The existing land uses of the Housing Element sites that may handle hazardous materials include Commercial Highway, Commercial Office, Neighborhood Commercial, and Industrial. However, the proposed projects proposes these sites adopt residential land uses, apart from the Bowker site. Household hazardous waste includes the disposal of any product labeled: toxic, poison, corrosive, flammable, combustible or irritant. Hazardous materials, used in many household products (such as drain cleaners, waste oil, cleaning fluids, insecticides, and car batteries), are often improperly disposed of as part of normal household trash resulting in these hazardous materials interacting with other chemicals to create risks to people or cause soil and groundwater contamination.

Older Structures

Many structures constructed prior to 1978 may contain hazardous building materials that were commonly used before modern environmental and public health regulations were adopted. These materials can include asbestos-containing materials (ACMs) in insulation, flooring, roofing, and other building components; lead-containing surfaces (LCSs), including lead-based paint (LBP); and other hazardous substances such as mercury-containing equipment, polychlorinated biphenyls (PCBs) in electrical equipment and building materials, and chlorofluorocarbons or other refrigerants in older cooling systems.

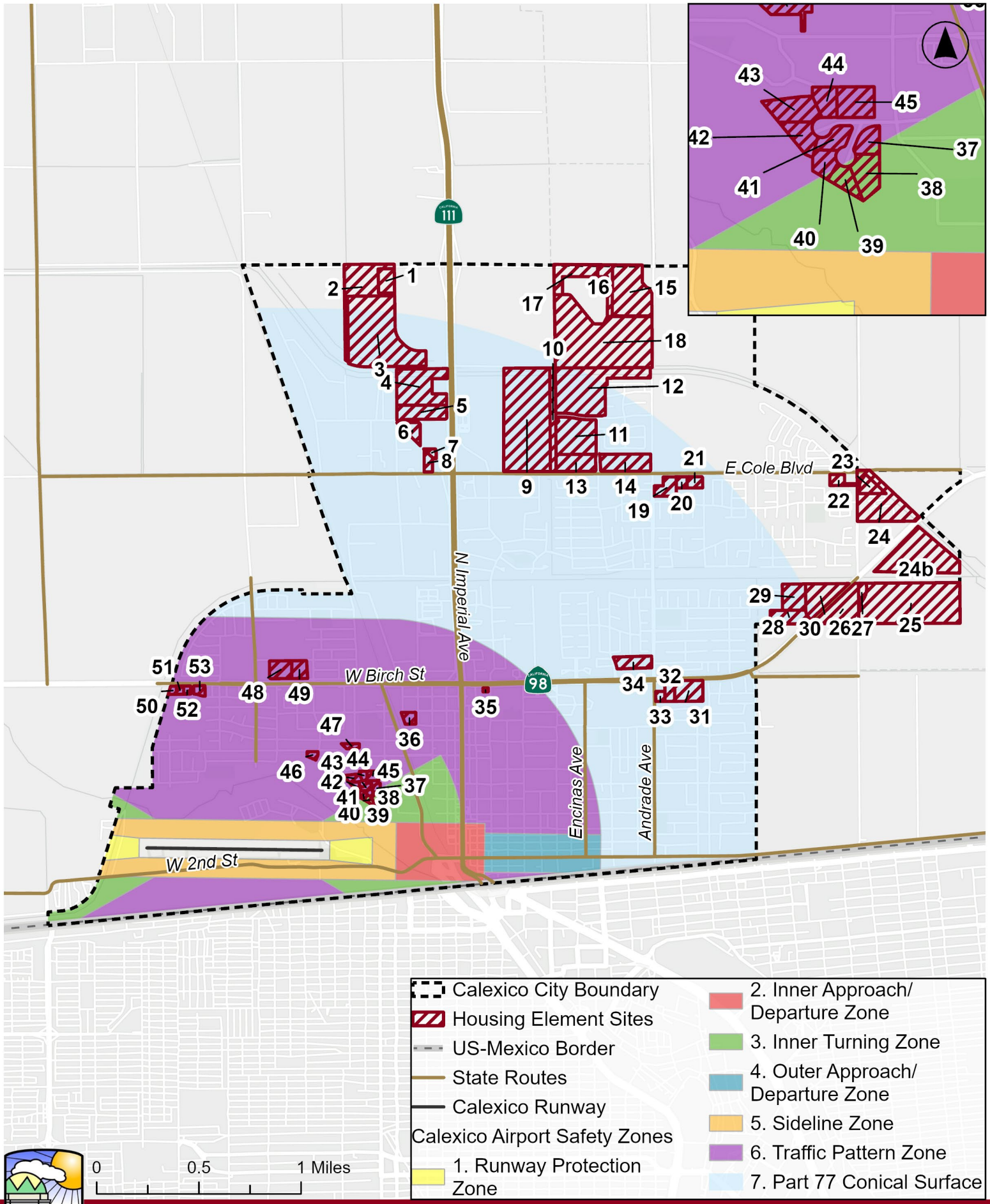


Figure 4.7-2:
Calexico International Airport Safety Zones

4.7.1.3 Hazardous Materials Transportation, Storage, Use, and Disposal

Hazardous materials pass through the City of Calexico in route to other destinations via the Interstate/State Highway system, rail, and surface street system The Union Pacific railway travels through many of the County's jurisdictions and its cargo at times consists of hazardous liquids. Interstate 8 also travels through the jurisdictions and the many semi-trucks cargo is hazardous (Imperial County, 2021). Hazardous materials are transported through the City via Interstate 8, State Route 98, State Route 111, local roadways, and rail facilities serving the Imperial Valley region. Due to Calexico's location along the United States–Mexico border and the presence of Calexico East and West Land Ports of Entry, substantial commercial truck traffic moves through the City on a daily basis, including vehicles carrying regulated hazardous materials. Hazardous materials transported through the City generally consist of fuels, industrial chemicals, agricultural products such as pesticides, and other regulated materials associated with regional commerce, agricultural production, and industrial activities.

4.7.1.4 Schools

Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, daycare, and agricultural uses. In particular, CEQA requires analysis of proposed projects that may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or planned school. The 11 schools within the City of Calexico are listed in Section 4.12.1.3, School Facilities, of this DEIR.

4.7.2 Regulatory Framework

4.7.2.1 Federal

United States Environmental Protection Agency (USEPA)

United States Environmental Protection Agency (USEPA) is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained in the Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws, which include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA provides oversight and supervision for federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) authorizes the USEPA to regulate the manufacture, import, use, storage, and disposal of chemical substances that may pose risks to human health or the environment. TSCA requires USEPA review of new chemicals entering commerce and provides authority to evaluate and restrict existing chemicals determined to present unreasonable risks. The TSCA also establishes regulatory requirements for specific hazardous substances, including polychlorinated biphenyls (PCBs), asbestos, lead-based paint, and formaldehyde.

Polychlorinated Biphenyls

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the TSCA (15 US Code Section 2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and highly specific safety procedures for their disposal. The state likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for non-liquids, Regional Water Quality Control Boards (RWQCBs) may exercise discretion over the classification of such wastes.

The transport and disposal of PCB's must generally comply with existing federal and state regulatory requirements, which include providing a manifest/shipping paper in compliance with 22 CCR § 67426.1, labeled in compliance 49 CFR Part 172(C) (22 CCR § 67428.1), any accidental discharges must be reported and cleaned up (22 CCR § 67428.1), and must be disposed of and delivered to a permitted disposal facility (22 CCR § 67429.1 and 66263.44; 27 CCR § 20870). Additional federal regulations related to the handling and disposal of PCB from electrical equipment are provided in 40 CFR Part 761.

Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) of 1976 establishes a comprehensive federal program for the management of hazardous and non-hazardous waste. The RCRA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste and establishes a framework for tracking hazardous materials from their point of generation to final disposal. The USEPA administers the program and authorizes states, including California, to implement hazardous waste management requirements that are at least as stringent as federal standards. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating

hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation, and Liability Act (CERLA)

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly referred to as "Superfund," was enacted in 1980 to address releases and threatened releases of hazardous substances into the environment. CERCLA authorizes the USEPA to investigate contaminated sites, require responsible parties to conduct cleanup actions, and recover cleanup costs. The law establishes procedures for responding to hazardous substance releases that may endanger public health, welfare, or the environment.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act, also known as SARA Title III, was enacted in October 1986. This law requires any infrastructure at the state and local levels to plan for chemical emergencies. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community. Sections 301 through 312 of the Act are administered by EPA's Office of Emergency Management. USEPA's Office of Information Analysis and Access implements the Emergency Planning Community Right-to-Know Act Section 313 program. In California, SARA Title III is implemented through the California Accidental Release Prevention Program.

Federal Water Pollution Control Act (Clean Water Act)

The Federal Water Pollution Control Act, better known as the Clean Water Act (CWA), is a comprehensive statute focused on restoring and maintaining the chemical, physical and biological integrity of the nation's waters. Originally enacted in 1948, the CWA was amended numerous times until it was reorganized and expanded in 1972. It continues to be amended almost on an annual basis. Primary authority for the implementation and enforcement of the CWA rests with the US EPA. The CWA:

- authorizes water quality programs; requires federal effluent limitations and state water quality standards;
- requires permits for the discharge of pollutants into navigable waters; provides enforcement mechanisms; and
- authorizes funding for wastewater treatment work, construction grants, and state revolving loan programs; and authorizes funding to states and tribes for water quality programs.

Provisions have also been added to address water quality problems in specific regions and specific waterways.

Other Federal Regulations

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act regulates the transportation of hazardous materials by highway, rail, air, and water. The Act establishes requirements for hazardous materials packaging, labeling, shipping documentation, handling procedures, and emergency response information to minimize risks associated with transportation-related incidents.

Federal Aviation Administration

The Federal Aviation Administration (FAA) is responsible for regulating and overseeing all aspects of civil aviation within the United States, including airspace management, airport operations, aviation safety, and aircraft navigation. The FAA establishes standards intended to protect public safety and ensure the safe and efficient operation of airports and aircraft. Through regulations contained in Title 14 of the Code of Federal Regulations (CFR), the FAA governs airport design, airspace protection, aircraft operations, and obstruction evaluation procedures.

The FAA reviews proposed structures and development projects located near airports to determine whether they could constitute hazards to air navigation. Pursuant to 14 CFR Part 77, proponents of projects exceeding specified height thresholds or located within designated airport review areas may be required to submit notice to the FAA for evaluation. The FAA evaluates potential effects on navigable airspace, airport operations, and aviation safety and may issue determinations identifying whether a proposed structure would create an obstruction or hazard to air navigation.

4.7.2.2 State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) coordinates environmental protection programs throughout the State and oversees departments responsible for hazardous materials management, environmental cleanup, pollution prevention, and public health protection. CalEPA administers programs related to hazardous substances, hazardous waste, environmental remediation, emergency response, and pollution control through its various boards, departments, and offices, including the Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), and Office of Environmental Health Hazard Assessment (OEHHA). CalEPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program).

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards regulate activities that may affect groundwater and surface water quality. The SWRCB oversees investigation and remediation of leaking underground storage tank (LUST) sites, maintains the GeoTracker database, and administers programs addressing soil and groundwater contamination associated with hazardous materials releases. The SWRCB also coordinates cleanup activities to ensure protection of water resources and public health.

California Department of Toxic Substances Control

The California Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste throughout California. DTSC oversees investigation and remediation of contaminated sites, maintains the EnviroStor database, and administers hazardous waste management programs pursuant to State and federal law. DTSC also participates in the development of the Cortese List pursuant to Government Code Section 65962.5, which identifies sites with known or suspected hazardous materials contamination.

California Health and Safety Code and Occupational Safety and Health Administration

The California Health and Safety Code establishes numerous requirements related to hazardous materials management, emergency response, public health protection, and worker safety. These regulations are supplemented by standards administered by the California Division of Occupational Safety and Health (Cal/OSHA), which regulates workplace exposure to hazardous substances and establishes requirements for employee training, hazard communication, hazardous waste operations, emergency response procedures, and worker protection. Cal/OSHA regulations are intended to minimize occupational exposure to hazardous materials during construction, demolition, remediation, and operational activities.

Chapter 6.7 of the California Health and Safety Code regulates the underground storage of hazardous substances to protect public health and the environment. It mandates that owners and operators of USTs comply with strict requirements for the design, construction, installation, and maintenance of these tanks to prevent leaks and spills. The chapter includes provisions for obtaining permits, conducting regular inspections, and implementing spill containment measures. It also requires financial responsibility for cleanup costs in case of leaks and outlines penalties for non-compliance.

California Code of Regulations

Title 22 – Hazardous Materials

Title 22 of the California Code of Regulations provides the definition of hazardous materials. A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. According to Title 22, Section 66260.10, of the California Code of Regulations (CCR), a hazardous material is defined as:

> *...A substance or combination of substances which because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or, (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed*.

Chemical and physical properties that cause a substance to be considered hazardous include the properties of toxicity, ignitability, corrosivity, and reactivity (Title 22, Sections 66261.20 through 66261.24). Factors that influence the health effects of exposure to hazardous materials include dosage, frequency, the exposure pathway, and individual susceptibility. The proposed Project would require use of small amounts of hazardous materials (such as diesel fuel, oil and grease for heavy equipment) during construction. However, the Project does not propose to use any hazardous materials (e.g. butane for extraction of oils) during operation.

Title 24 – California Building Code

The State of California provides a minimum standard for building design through the 2025 California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations. The 2025 CBC is developed by the California Building Standards Commission and is based on model codes, with modifications tailored to California-specific conditions such as seismic, fire, and energy concerns. It is adopted on a jurisdiction-by-jurisdiction basis and may be further modified to address local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements under the CBC include the installation of automatic sprinkler systems in specific buildings; the establishment of fire-resistance standards for doors, building materials, and construction types; and the maintenance of defensible space through vegetation clearance around structures located in wildfire hazard areas.

Title 24 – California Fire Code

Part 9 of Title 24 of the California Code of Regulations contains the California Fire Code (CFC), which establishes regulations intended to safeguard life and property from fire and

explosion hazards. The CFC includes requirements for hazardous materials storage and handling, fire apparatus access, emergency vehicle circulation, fire protection systems, emergency planning, operational permits, and fire prevention measures.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a Risk Management Plan to the local Certified Unified Program Agency (CUPA). The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act amendments.

Landscape/Brush Management Regulations

The California Public Resources Code establishes requirements for vegetation management and defensible space intended to reduce fire hazards and improve emergency response capabilities. Public Resources Code Sections 4290 and 4291 establish standards related to fuel modification, vegetation management, emergency access, and defensible space around structures in designated fire hazard areas. These regulations are intended to reduce the potential for fire ignition and spread while improving firefighter safety and access during emergency events.

Fire Hazard Severity Zones

California Government Code Section 51175 et seq. and Public Resources Code Sections 4201 through 4204 require the State Fire Marshal to identify and map Fire Hazard Severity Zones (FHSZs) throughout California. FHSZ classifications are based on factors such as vegetation, topography, fire weather, and fire history and are used to guide land use planning, building standards, and wildfire mitigation requirements. Development within designated FHSZs may be subject to additional fire protection, defensible space, and building design requirements intended to reduce wildfire risk.

Senate Bill 99

Senate Bill 99 (SB 99) mandates the inclusion of emergency evacuation routes in the safety elements of general plans to enhance community safety. SB 99 requires cities and counties to identify residential developments in hazard areas that lack at least two emergency evacuation routes and update their safety elements accordingly. This update must occur upon the next revision of the housing element on or after January 1, 2020. The bill aims to

ensure that residents in hazard-prone areas have adequate evacuation options during emergencies, such as wildfires or floods, thereby improving public safety and preparedness.

Assembly Bill 747

Assembly Bill 747 (AB 747) requires the safety elements of general plans to be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios. This update must occur upon the next revision of a local hazard mitigation plan on or after January 1, 2022, or by January 1, 2022, if a local jurisdiction has not yet adopted such a plan. The bill allows cities and counties that have adopted a local hazard mitigation plan, emergency operations plan, or similar document to use that information in the safety element by summarizing and incorporating it by reference.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with USEPA and the Occupational Safety and Health Administration (CalOSHA), regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos. The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

Lead-Based Paint (LBP)

State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations. The Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) requires disclosures of the presence of lead paint in residential structures.

Regulations for LBP are also contained in the Lead-Based Paint Elimination Final Rule, 24 CFR 33, governed by the U.S. Housing and Urban Development, which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must be in compliance with CalOSHA, Federal OSHA, and with the State of California Department of Health Services requirements. Only LBP-trained and certified abatement personnel are allowed to perform abatement activities. All LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Regulations to manage and control exposure to LBP are also described in CFR Title 29, Section 1926.62 and CCR Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 sf of LBP would be disturbed.

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination.

DTSC Human and Ecological Risk Office Screening Levels

DTSC screening levels were derived from the USEPA Regional Screening Levels (RSLs) using DTSC-modified exposure and toxicity factors for constituents in soil, tap water, and ambient air. The DTSC screening levels should be used in conjunction with the USEPA RSLs and RWQCB ESLs to evaluate chemical concentrations in environmental media at California sites and facilities.

4.7.2.3 Regional

Imperial County Emergency Operations Plan

Imperial County maintains the Emergency Operations Plan (EOP) which provides a comprehensive, single source of guidance and procedures for the County to prepare for and respond to significant or catastrophic natural, environmental or conflict-related risks that produce situations requiring coordinated response. It further provides guidance regarding management concepts relating to response and abatement of various emergency situations, identifies organizational structures and relationships, and describes responsibilities and functions necessary to protect life and property. The OEP is consistent with the requirements of the Standardized Emergency Management System (SEMS) as defined in Government Code Section 8607(a) and the National Incident Management System (NIMS), as defined by Presidential Executive Orders for managing response to multi-agency and multi-jurisdictional emergencies. As such, the plan is flexible enough to use in

all emergencies and will facilitate response and short-term recovery activities. SEMS/NIMS incorporate the use of the Incident Command System (ICS), mutual aid, the operational area concept, and multi/interagency coordination.

Imperial County Emergency Operations Center (EOC)

The Office of Emergency Services establishes the Imperial County / Operational Area Emergency Operations Center (EOC) when directed by County emergency management authority. The EOC is a central location from which comprehensive emergency management is performed during major emergencies or disasters. It facilitates a coordinated response among the Director of Emergency Services, Emergency Management Staff, and representatives from community, local, State, and federal agencies assigned emergency management responsibilities.

Imperial County Multi-Jurisdictional Hazard Mitigation Plan

The 2021 Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) identifies natural and human-caused hazards affecting the region and establishes strategies intended to reduce risks to public safety, infrastructure, and property. The plan addresses hazards including hazardous materials incidents, transportation accidents, flooding, wildfire, earthquakes, extreme heat, and other emergency events. The plan also supports regional emergency preparedness and eligibility for hazard mitigation funding. According to the MHMP, Imperial County and the cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial, and Westmorland have integrated the hazard information, risk assessments, and mitigation strategies of the MHMP, including data, analysis, and maps, into their General Plans, Flood Management Plans, Emergency Plans, Integrated Regional Water Management Plan, Land Use Elements, Seismic, Health and Public Safety Elements, Hazardous Material Area Plan, Pest Exclusion Plan, and Capital Improvement Plans where needed. The MHMP contains the following goals, objectives and policies for the City of Calexico related to hazards and hazardous materials:

- **Objective 4:** The distribution and intensity of land uses should consider the health, safety, and welfare of the community in regard to man-made and natural hazards.
- **Policy 4a:** Floodways shall be kept free and clear of any structure or other obstructions.
- **Policy 4b:** Development that encroaches into a floodplain shall meet the Federal Emergency Management Administration (FEMA) requirements.
- **Policy 4c:** Inappropriate existing land uses within a land use compatibility zone as defined by the Imperial County Airport Land Use Compatibility Plan, shall not be expanded or enlarged beyond the requirements permitted in the zone.

- **Policy 4d:** Future land uses within land use compatibility zone A or B as defined by the Imperial County Airport Land Use Compatibility Plan, shall meet the guidelines of the zone. Future land uses located in zone C shall be reviewed for compatibility by the City prior to approval.
- **Policy 4e:** Future residential land uses shall not be located immediately adjacent to the railroad tracks.
- **Objective 14:** The City shall work with the Airport Management to encourage and attract compatible users and uses in and around the airport to promote airport safety and consider potential airport related noise.
- **Policy 14a:** In the event that Airport Management receives a substantial number of complaints regarding increases in noise levels, the City of Calexico may request noise abatement procedures be established and implemented.
- **Policy 14b:** Significant changes in land use in and around the airport (within 2 miles) shall be referred to the Imperial County Airport Land Use Commission for their comment and consideration.
- **Goal 5.8.1:** Reduce the risk to the Calexico's day and nighttime populations from exposure to hazardous materials and waste.
- **Objective 5.8.1.1**: To ensure the health, safety, and welfare of residents and guests of Calexico through strict regulation and planning for the safe transport, storage, and usage of hazardous materials in the Calexico area.
- **Policies 5.8.1.1:**
    - Discourage the transport of hazardous materials through residential areas and critical facilities and limit transport through heavily developed areas as much as possible.
    - Prohibit incompatible land used near sites that use, store, or produce hazardous materials.
    - Cooperate with the County to implement applicable portions of the *County's Hazardous Waste Management Plan*
- **Goal 5.8.2.2:** Reduce the risk posed by the current conditions of the New River.
- **Objective 5.8.2.2.1:** Protect residents from the potential hazards associated with the New River, including restricting access.
- **Policies 5.8.2.2.1:**
    - Cooperate with international, federal, state, and regional responsible agencies in projects aimed at cleaning up the New River through the implementation of the New River Improvement Project Strategic Plan.
    - Continue to restrict access to the river and maintain bilingual signs that warn of the dangers of contact with the water.

- Continue to seek county, state, or federal funds to cover costs incurred by the City for work done to restrict public access to the river or any other measure associated with the rive due to its pollution or risk to public safety.
- Prohibit land development near the New River in order to reduce exposure of people to the potential contact with the water, odors, and airborne foam.
- Adopt design set-back of a distance of 50 feet outside the shaded 500-year flood zone areas delineated on the FEMA maps for the New River.

The MHMP identifies Calexico as having a high probability of hazardous materials incidents and a very high potential severity should such incidents occur.

The MHMP does not identify a hazardous materials site within the City of Calexico.

Imperial County Operational Area Hazardous Materials Area Plan

The State legislature, in recognizing the risks that hazardous materials and wastes pose to emergency responders and the community, created a hazardous materials disclosure program under Chapter 6.95, Section 25500, et seq., of the Health and Safety Code. This program requires the Imperial County Operational Area Department of Toxic Substances Control – Imperial Certified Unified Program Agency, the administering agency to develop an Hazardous Materials Area Plan detailing the duties and responsibilities of governmental and other response agencies in a hazardous materials incident,

The 2016 Imperial County Hazardous Materials Area Plan (HMAP) identifies local, state, and federal responsibilities during incidents involving the release or threatened release of hazardous substances. Per the HMAP, Imperial County has agreements relating to hazardous materials response with the following jurisdictions:

- Yuma County: Emergency Management Mutual Aid Agreement
- California Department of Forestry and Fire Protection (CAL FIRE): Agreement for Automatic Aid

Imperial County Air Pollution Control District

The Imperial County Air Pollution Control District (ICAPCD) is responsible for regulating stationary sources of air pollutant emissions throughout Imperial County and enforcing federal, state, and local air quality requirements. The ICAPCD administers permit programs for facilities that emit air pollutants, implements rules governing the handling and storage of hazardous materials that may affect air quality, and coordinates with state and federal agencies on air quality compliance and enforcement. Through its permitting, inspection, and enforcement programs, the ICAPCD helps reduce public exposure to hazardous air contaminants and minimizes potential health and safety risks associated with industrial, commercial, and transportation-related activities.

Imperial Valley Hazardous Emergency Assistance Team IV HEAT

The Imperial Valley Hazardous Emergency Assistance Team (IV HEAT) is a regional hazardous materials response team that provides specialized emergency response services throughout Imperial County. IV HEAT assists local fire departments, law enforcement agencies, and emergency management personnel in responding to hazardous materials incidents, including chemical releases, fuel spills, transportation accidents, and other events involving potentially hazardous substances. The team is equipped to identify, contain, and mitigate hazardous materials emergencies and provides technical expertise to support the protection of public health, safety, and the environment. Through coordination with local jurisdictions and regulatory agencies, IV HEAT helps ensure that hazardous materials incidents are effectively managed and that risks to surrounding communities are minimized.

Imperial County Airport Land Use Compatibility Plan

The Imperial County Airport Land Use Compatibility Plan (ALUCP) establishes policies intended to protect public health, safety, and welfare by promoting compatible land uses around airports within the County. The ALUCP identifies Airport Influence Areas, safety zones, noise compatibility criteria, and airspace protection requirements applicable to development near airports, including Calexico International Airport. The ALUCP was recently updated in 2026, and Appendix B of the updated ALUCP provides an overview of the setting, airport influence area, safety zones, noise, airspace, and overflight areas for the Calexico International Airport.

4.7.2.4 Local

Certified Unified Program Agency (CUPA)

A CUPA is a local agency that has been certified by CalEPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by Cal/EPA to become a CUPA but is the responsible local agency that would implement the Unified Programs, listed below, until they are certified. The DTSC Imperial CUPA (a regional division of DTSC) is the certified CUPA for the City. The Unified Program consolidates, coordinates, and makes consistent the following five existing programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs

County of Imperial Solid Waste Local Enforcement Agency (LEA)

State law requires every local jurisdiction to designate a solid waste Local Enforcement Agency (LEA), which is certified by the California Department of Resources Recycling and Recovery (Cal Recycle), to enforce federal and state laws and regulations for safe and proper handling of solid waste. The County of Imperial Solid Waste LEA is responsible for enforcement of federal, state, and local laws and regulations within the jurisdiction of the County of Imperial protect public health safety and the environment by ensuring safe and proper solid waste management practices.

General Plan Safety Element

The City of Calexico Safety Element identifies policies and programs intended to reduce risks associated with natural and human-caused hazards, including hazardous materials incidents, transportation emergencies, and emergency evacuations. The Safety Element identifies State Route 111, State Route 98, and Interstate 8 as critical emergency access and evacuation routes and establishes policies supporting emergency preparedness, hazard mitigation, and public safety. Section 8.2.3 of the Safety Element discusses Hazardous Materials, stating that the risk posed by hazardous materials has been a concern for the City due to heavy border truck and rail traffic as well as hazardous materials release from agricultural operations. Policies 5a-c regulate the safe transport and storage of hazardous materials, and state the following:

- **Policy 5a**: Discourage the transport of hazardous materials through residential areas and critical facilities and limit transport through heavily developed areas as much as possible. (See Truck Route designations, figure G3, in the Circulation Element.)
- **Policy 5b:** Prohibit incompatible land uses near sites that use, store or produce hazardous materials.
- **Policy 5c**: Plan future industrial parks to the east, north, and northeast of the City such that the industrial uses, along with the Port of Entry East Border Crossing), United States and Mexico International Border, will reduce truck traffic, especially those containing hazardous materials, as they will be diverted from the center of the City.

General Plan Conservation and Open Space Element

The City of Calexico Conservation and Open Space Element identifies policies and programs intended to reduce conflicts between agriculture and residential uses.

- **Policy 6c:** Minimize the conflicts between agricultural and residential land uses by requiring the use of buffer zones, roads, and other physical boundaries between uses.

Calexico Municipal Code

The Calexico Municipal Code establishes regulations intended to protect public health, safety, and welfare through standards governing land use, development, hazardous materials management, emergency access, and fire protection. Relevant provisions include Chapter 15.20 (Fire Prevention Code), which incorporates applicable provisions of the California Fire Code and establishes local requirements related to fire apparatus access, operational permits, inspections, hazardous materials storage, and emergency response planning. In addition, the City's zoning and development regulations establish standards related to land use compatibility, setbacks, site design, and circulation that support emergency access and reduce potential hazards associated with future development.

4.7.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts related to hazards and hazardous materials would be significant if the project would:

1) Threshold 1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2) Threshold 2: 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.
3) Threshold 3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4) Threshold 4: 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 create a significant hazard to the public or environment.
5) Threshold 5: For a project located within an ALUCP or, where such plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard for people residing or working in the project area.
6) Threshold 6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7) Threshold 7: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas, within brush fire management zones, or where residences are intermixed with wildlands.

4.7.4 Methodology

This analysis is based on a review of publicly available information and applicable regulatory documents to identify existing hazardous materials conditions and potential hazards associated with implementation of the proposed project. Sources reviewed included: (1) the California Department of Toxic Substances Control (DTSC) EnviroStor database; (2) the State Water Resources Control Board GeoTracker database; and (3) the Imperial County Airport Land Use Compatibility Plan. No site-specific hazardous materials investigations or field surveys were conducted for this program-level EIR. Instead, the analysis relies on publicly available databases, planning documents, and regulatory information to assess potential impacts associated with implementation of the proposed project.

4.7.5 Issue 1: Routine Use, Transport, and Disposal

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

4.7.5.1 Impact Analysis

Construction of future development that implements the proposed project would likely involve small amounts of hazardous materials such as fuels, lubricants, solvents, and architectural coating materials but the proposed project does not include the routine transport, use or disposal of hazardous materials.

During operations of the proposed project, hazardous materials may be used for cleaning and maintenance, as well as manufacturing activities associated with the Bowker site, which could have the potential to involve the transport, use, and disposal of hazardous materials that could pose a significant hazard to the public or the environment through potential release of hazardous materials into the environment. The transport of hazardous materials by truck and rail is regulated by the U.S. Department of Transportation ("DOT"). Federal safety standards are also included in the California Administrative Code. Additionally, the California Health Service Department regulates licensed haulers of hazardous waste.

Agricultural operations remain present on lands surrounding portions of the City's developed urban area. The interface between the urban areas and agricultural operations will be expanded, resulting in a greater potential for human exposure to pesticides. The County of Imperial Agricultural Commission, California Environmental Protection Agency, and the Department of Pesticide Regulation are the major enforcement agencies responsible for controlling and monitoring pesticide use. With agricultural uses subject to applicable federal, State, and local pesticides regulations, and residential uses subject to General Plan Conservation Element Policy 6c, requiring the use of buffer zones and physical

boundaries between residential and agricultural uses, potential agricultural hazards would be reduced to less than significant.

During construction and operations, hazardous materials and wastes would be managed, used, and disposed of in accordance with all applicable Federal, State, and local regulations governing hazardous materials management, spill prevention, emergency response, and waste disposal (refer to Section 4.7.2, Regulatory Framework). This includes handling of any soils with potential for ACMs and lead-based paint contamination in accordance with Cal/OSHA requirements and release reporting, initial abatement, and corrective actions for any unauthorized release of hazardous materials with oversight from the RWQCB, DTSC, Calexico Fire Department (CFD), and other regulatory agencies, as necessary. These regulations are intended to minimize risks to public health and the environment associated with the transportation, storage, and disposal of hazardous substances. Compliance with applicable standards would minimize impacts related to hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials to a less than significant level.

4.7.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.5.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.7.6 Issue 2: Accidental Release

Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

4.7.6.1 Impact Analysis

Construction associated with future residential development would involve the temporary use of fuels, lubricants, paints, solvents, and other materials that could be released through accidental spills. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal, State, and local regulations, including but not limited to the CERCLA, the TSCA, the California Health and Safety Code, and the California Fire and Building Codes. In addition, construction projects typically maintain supplies on site for containing and cleaning small spills of hazardous materials which would not be used in large quantities that could generate a significant hazard. Pursuant to the Code of Federal Regulations, Title 29, Part 1910.1200,

the property owner/developer for each project would ensure training would occur for project construction workers on the proper use, storage, and disposal of hazardous materials.

Household operations of future development would generally involve the use of household cleaners and solvents; however, hazardous materials storage, handling, transportation, and disposal activities are regulated by numerous federal, State, and local agencies and these materials would not be used in large quantities that could generate a significant hazard. Household cleaners and solvents are managed through existing municipal solid waste disposal and recycling programs in the City (refer to Section 4.14, Utilities and Service Systems).

However, future development projects would be subject to applicable regulations governing hazardous materials management, spill prevention, emergency response, and worker safety. The CFD and Imperial County environmental regulatory agencies provide oversight and emergency response capabilities for hazardous materials incidents. In addition, any businesses that handle hazardous materials such as hazardous waste or substances at reportable quantities are required to submit a Hazardous Materials Disclosure and Business Emergency Plan to the California Environmental Reporting System. The CUPA then verifies this information and provides it to agencies that are responsible for the protection of public health and the environment. Compliance with all applicable federal, State, and local requirements would reduce potential impacts to less than significant.

4.7.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.6.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.7.7 Issue 3: Emissions Near a School

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

4.7.7.1 Impact Analysis

The Calexico Unified School District operates 11 schools located throughout Calexico, including in established residential neighborhoods where future infill and redevelopment may occur. There are two private schools within the City: Our Lady of Guadalupe Academy, a K-8 school located at the southeast corner of Rockwood Avenue and E. 6th Street, and Calexico Mission School, a K-12 school located adjacent to the US-Mexico border at the southwest corner of Blair Avenue and E 2nd Street.

Implementation of the proposed project would facilitate residential development near existing schools. However, residential land uses do not typically involve the use, handling, storage, or disposal of hazardous or acutely hazardous materials in quantities that would create substantial risks to nearby students or school staff. The Bowker site with a proposed rezone to Industrial is not within a quarter mile of an existing or proposed school. Furthermore, development of the Bowker site would be subject to applicable hazardous materials regulations and City review procedures.

Construction activities would require the operation of heavy equipment (e.g., dozers, excavators, tractors) that would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the housing sites during construction. Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, nearby schools, the public, and the environment. However, construction contractors are required to comply with all applicable Federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the USEPA, DTSC, and the RWQCB. Compliance with existing regulations applicable to the construction and operation of residential and commercial uses would prevent the release of hazardous materials to the extent feasible, and would reduce the potential for the emission of hazardous materials or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts related to emitting or handling hazardous materials within 0.25 mile of a school would be less than significant.

4.7.7.1 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.7.2 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.7.8 Issue 4: Hazardous Materials - Sites

Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

4.7.8.1 Impact Analysis

As detailed in Section 4.7.1.1, Known Hazardous Materials Sites, none of the proposed project housing sites are located on or overlap with listed active EnviroStor or GeoTracker

hazardous materials sites. The Former CA Fun Mart (T10000009970) is located adjacent to housing site 8, however, it does not represent a risk of off-site exposure or hazard based on a review of the GeoTracker case details. As shown in Figure 4.7-1, housing site 48 is the only site to be located on a Voluntary Cleanup Sites, School Cleanup Sites, or Tiered Permit site, however, this site is inactive or need no further action.

However, the presence of nearby hazardous materials sites does not necessarily indicate that contamination has migrated onto an opportunity site or that future residential development would expose residents to hazardous materials. Potential risks, if any, posed by sites with former USTs would be minimized by managing the site according to existing standards contained in California Health and Safety Code and other applicable federal, State, and local regulations.

Future development projects would be subject to site-specific review and would be required to comply with all applicable federal, State, and local environmental regulations. If evidence of contamination is encountered during project implementation, additional investigation and remediation would be required in accordance with regulatory agency requirements. Compliance with existing applicable regulations and policies would minimize risks from the release of hazardous materials, substances, or waste, and oversight by the appropriate regulatory agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of release and exposure of hazardous materials. Therefore, impacts related to hazardous materials sites listed pursuant to Government Code 65962.5 would be less than significant.

4.7.8.1 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.8.2 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.7.9 Issue 5: Airport Hazards

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?

4.7.9.1 Impact Analysis

The southeastern portion of Calexico is located adjacent to the Calexico International Airport. Airport operations include general aviation activities, aircraft takeoffs and landings, overflight activity, and associated noise and safety considerations. As shown on Figure 4.7-2, Calexico International Airport Hazard Zones, housing sites 35, 36, 41-53, and portions of

sites 37 and 40 are located within the 2026 Imperial County Airport Land Use Compatibility Plan (ALCUP) Zone 6. Housing sites 38, 39, and the remaining portions of sites 37 and 40 are located within the more restricted Zone 3 of the ALUCP.

The ALUCP establishes compatibility criteria intended to minimize public exposure to airport-related safety hazards and excessive aircraft noise by regulating the location, density, and intensity of land uses within airport influence areas. Pursuant to State law, local agencies are required to refer certain development proposals within an Airport Influence Area to the Imperial County Airport Land Use Commission (ALUC) for a determination of consistency with the ALUCP prior to project approval.

The Housing Element identifies housing sites and includes planning assumptions regarding potential residential capacity to demonstrate compliance with State housing law; however, it does not approve or authorize residential development on any site. The Housing Element does not establish final residential densities, building locations, site layouts, building heights, or other design characteristics that would determine whether future development would be compatible with airport safety or noise standards. Accordingly, the information necessary to evaluate airport compatibility for individual sites is not available at this programmatic level of environmental review.

Future residential development proposed on housing sites within the Airport Influence Area would undergo separate project-level review. As part of that review, proposed projects would be evaluated for consistency with the applicable ALUCP policies and compatibility criteria, including those related to safety zones, overflight, and aircraft noise. Projects subject to the Airport Land Use Commission's jurisdiction would be referred to the ALUC for a consistency determination, and the City could not approve projects that are inconsistent with applicable airport compatibility requirements unless authorized by State law. Through this review process, project-specific modifications, including changes to site design, density, building placement, or other development characteristics, may be required to ensure compatibility with airport operations.

As discussed in Appendix H (Noise Analysis) and Section 4.10.7.1 of this DEIR, airport noise contours obtained from the Imperial County ALUCP show that adjacent land uses would not be exposed to airport noise that exceeds 60 CNEL.

Additionally, future projects within the Airport Influence Area would be subject to ALUCP review and consistency determinations prior to approval and project-level impacts are not known at this time. Implementation of the proposed project could result in airport-related safety hazards for residents or workers upon buildout. Any potential airport compatibility issues would be addressed through subsequent project-level review and compliance with

the ALUCP, but because site-specific impacts are not known at this program-level review, impacts would be considered significant and unavoidable.

4.7.9.1 Mitigation Framework

The following mitigation measure is recommended for future discretionary and by-right development proposals:

MM HAZ-1: Airport Compatibility Hazards. For any Discretionary or By-Right development project identified in the Housing Element that is subject to review under the Imperial County Airport Land Use Compatibility Plan (ALUCP) and is determined to be inconsistent with the applicable ALUCP, the City shall require the project applicant to implement the following measures, as applicable:

1. Prior to approval of the applicable discretionary development entitlement, the project applicant shall submit the proposed development to the Federal Aviation Administration (FAA) for aeronautical review and obtain the applicable FAA determination prior to approval of the project. If the FAA issues a Determination of No Hazard to Air Navigation with conditions, the project shall comply with all applicable conditions of that determination. The FAA's obstruction evaluation process applies to proposed construction or alterations that may affect navigable airspace.

2. Prior to issuance of building permits, the project applicant shall record an avigation easement over the project property in favor of the applicable airport owner/operator, where required by the ALUCP. The easement shall be in a form acceptable to the City and shall acknowledge the right of aircraft to overfly the property, including associated aircraft noise and other effects of normal airport operations. The applicant shall also provide notice of the property's proximity to the airport and associated aircraft overflight and noise conditions to present and future property owners and occupants, as applicable.

3. Prior to issuance of building permits, the project applicant shall demonstrate to the Calexico Planning and Building Division that the final project design incorporates the following measures to reduce potential hazards associated with aircraft operations:

    a. All outdoor lighting shall be designed, located, and installed so that it is hooded, shielded, or otherwise directed downward to prevent direct light spillage or reflection into the sky and to minimize the potential for confusion with airport or aircraft navigation lighting.

    b. Residential structures shall incorporate noise attenuation measures, as determined by a qualified acoustical consultant, sufficient to achieve an interior aircraft noise level of 45 CNEL or less in habitable rooms. The

acoustical analysis and proposed attenuation measures shall be reviewed and approved by the City prior to issuance of building permits, and the measures shall be incorporated into the final building plans and implemented during construction.

4. If the City Council elects to overrule an ALUC determination that a proposed development is inconsistent with the applicable ALUCP, the project applicant shall enter into a Defense and Indemnification Agreement with the City, in a form acceptable to the City Attorney, as a condition of project approval.

These requirements shall be incorporated into the project's conditions of approval and, where applicable, the project's recorded covenants, conditions, and restrictions (CC&Rs), so that the requirements remain applicable to subsequent property owners and occupants.

4.7.9.2 Significance After Mitigation

Implementation of **MM HAZ-1** would reduce the safety hazard or excessive noise impact for people residing in the project area. However, because the specific characteristics of future development and site conditions are not known at this program level, it cannot be determined whether the mitigation would reduce impacts to less than significant. Site-specific review of future development would determine the applicability and effectiveness of **MM HAZ-1** and whether additional feasible measures are needed. As such, impacts would remain **significant and unavoidable**.

4.7.10 Issue 6: Emergency Response

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

4.7.10.1 Impact Analysis

The proposed project would accommodate future residential growth through infill and redevelopment within the City's existing urbanized area with existing roadway infrastructure. Future development would increase population and vehicle trips, further discussed in Section 4.13.6; however, the proposed project does not propose the closure, relocation, or modification of existing roadways identified as critical emergency response and evacuation routes or propose new roadways that would interfere with an adopted emergency response plan or emergency evacuation plan.

Future development accommodated under the proposed project would be required to maintain adequate emergency access during both construction and operation. Additionally, future development would be required to comply with applicable federal, State, and local regulations such as from the CFC, CBC, MHMP, the General Plan Safety Element, and the

City's roadway design standards and emergency access requirements to ensure adequate access for emergency vehicles.

Therefore, development facilitated by the proposed project would not physically obstruct emergency routes or interfere with implementation of adopted emergency response procedures. The impact related to emergency response and evacuation plans would be less than significant.

4.7.10.1 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.10.2 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.7.11 Issue 7: Wildland Fires

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

4.7.11.1 Impact Analysis

As discussed in Section 4.7.1.2 above and Section 4.15 Wildfire, portions of the City and the proposed project are in Moderate High FHSZs and WUI designation areas identified by CAL FIRE. Impacts associated with wildland fires are discussed in detail in Section 4.15, Wildfire. As described therein, future development would be required to comply with applicable Federal, State, and local regulatory requirements, such as the California Fire Code, California Building Code, MHMP, and City General Plan, and Calexico Municipal Code requirements related to emergency access, water supply, fire flow, and defensible development practices.

Implementation of the applicable Federal, State, and local policies would reduce the risk of significant loss, injury, or death related to wildland fires. As such, implementation of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore impacts related to wildland fires would be less than significant.

4.7.11.1 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.7.11.2 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.8 Hydrology and Water Quality

This section analyzes potential impacts to hydrology and water quality conditions that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

This section addresses potential impacts associated with changes to hydrological conditions resulting from implementation of the project and evaluates the project's consistency with applicable goals and policies. Information in this section comes from secondary source materials including regional and local water improvement plans, existing technical reports prepared for the City like the 2018 Service Area Plan, the adopted General Plan from 2007, the 2015 Draft General Plan, and Municipal Code. For discussion of water supply, see Section 4.14, Utilities and Service Systems. Issues regarding wetlands and waters of the United States are discussed in Section 4.3, Biological Resources.

4.8.1 Existing Conditions

4.8.1.1 Hydrologic Characteristics and Drainage Patterns

The City of Calexico is located in the southern portion of Imperial County adjacent to the United States–Mexico international border. Regional topography is characterized by the relatively flat alluvial plain of the Imperial Valley, with ground surface elevations generally decreasing northward toward the Salton Sea.

Under the California Department of Water Resources (DWR) hydrologic classification system, Calexico is located within the Colorado River Hydrologic Region. The City lies within the Imperial Valley portion of the lower Colorado River drainage area. The City is located within the Salton Sea watershed, part of the East Colorado River Basin Region (SWRCB 2019). The Salton Sea watershed encompasses about 8,360 square miles and contains five (out of a total of six) of the Colorado River Basin Region's impaired surface waterbodies.

The principal surface water feature associated with Calexico is the New River. As shown in Figure 4.8-1: Waterways, the New River originates in Mexico, enters the United States at the international border in Calexico, and flows north through Imperial County before discharging to the Salton Sea. The New River serves as a major conveyance facility for municipal, industrial, agricultural, and stormwater flows generated on both sides of the international border. The Alamo River, located east of Calexico, is another major regional drainage course that ultimately discharges to the Salton Sea. The Salton Sea, located approximately 30 miles

north of Calexico, is the principal receiving water body for regional surface-water drainage originating within the Imperial Valley.

Historically, the Imperial Valley drained internally toward the Salton Sink, however, existing drainage patterns within and surrounding Calexico have been substantially modified through development of the Imperial Irrigation District (IID) conveyance and drainage system, which collects agricultural runoff and conveys flows through a series of drains and channels. Water conveyance features in the vicinity include the IID canal and drainage network, including agricultural drains and stormwater channels that provide irrigation return-flow and flood-control functions throughout the Imperial Valley. This includes the All-American Canal (AAC), running parallel to the U.S.–Mexico border, it passes through the City and branches into other canals and drains to supply agricultural operations to the Imperial Valley. The AAC is a major water conveyance facility operated by the IID. Although the canal functions primarily as a water supply conveyance rather than a natural drainage feature, it is a prominent component of the regional hydrologic system and influences groundwater recharge and water management within the area.

Housing sites 39, 40, 42, and 43 are located proximate to the New River and housing sites 2 through 4, 9, 10, 12, 18, 23 through 27, 29, 30, and 50 are located adjacent to the AAC.

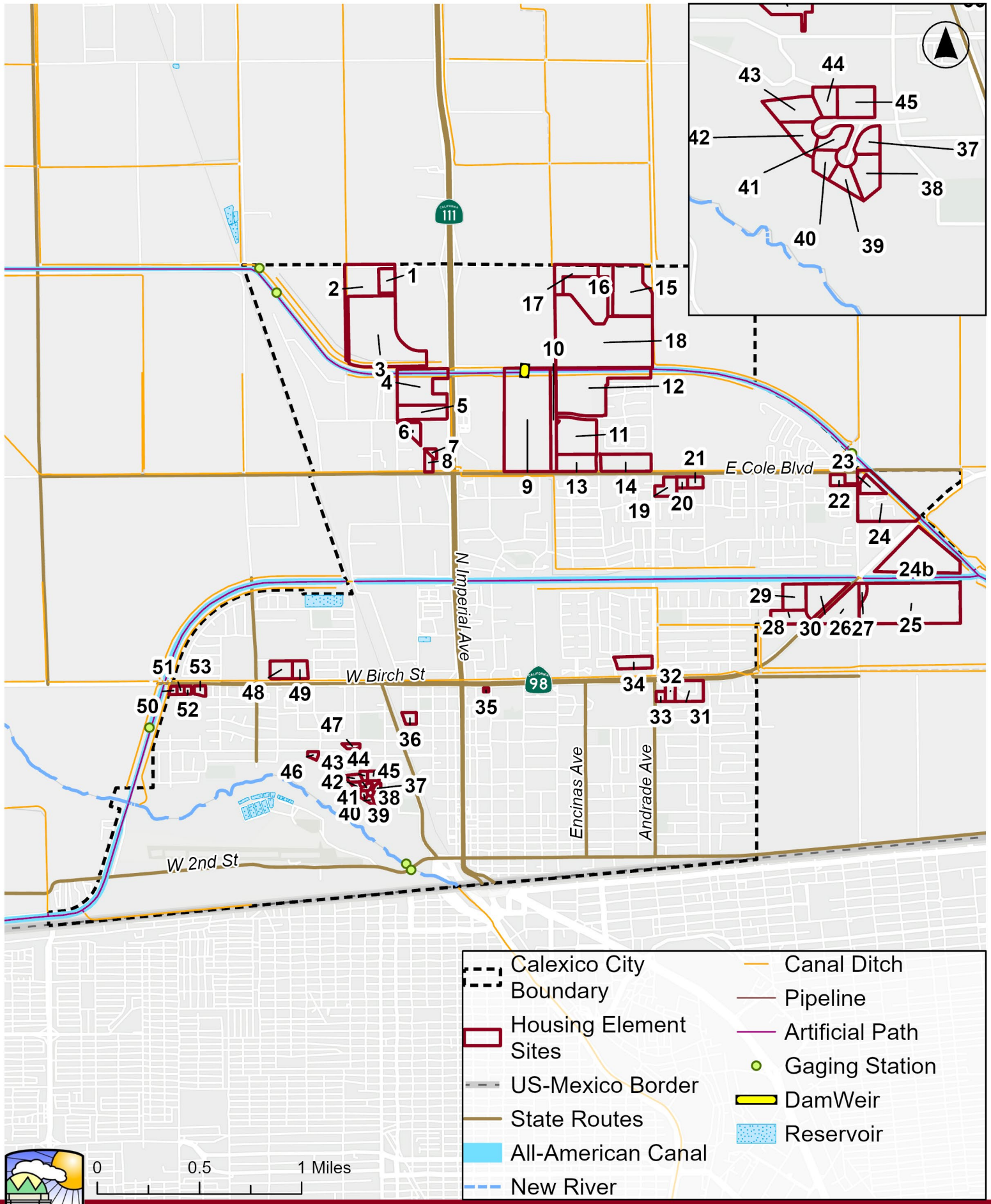


Figure 4.8-1:
Waterways

4.8.1.2 Stormwater

These facilities convey stormwater runoff into the main water drainage system managed by the IID and the majority ultimately drains to the New River, and farther downstream, to the Salton Sea. It should be noted, however, that the primary drainage system managed by IID is not designed to convey all stormwater runoff from urbanized areas (City of Calexico 2018). Because of the highly managed nature of the Imperial Valley hydrologic system, watershed boundaries and drainage patterns are influenced by engineered canals, drains, and flood-control facilities in addition to natural topography.

4.8.1.3 Water Quality

Division 7 of the Water Code (also known as the Porter-Cologne Water Quality Control Act) requires the Regional Water Board to consider past as well as present and probable future beneficial uses when establishing water quality objectives (SWRCB 2019). The existing water quality of the New River limits the presence of beneficial uses, however, with completion of the New River Improvement Project in May of 2025, existing beneficial uses of New River water are expected to increase, particularly fish and wildlife, and non-contact water recreational use.

4.8.1.4 Groundwater

The Imperial Valley Groundwater Basin is identified by DWR as Groundwater Basin No. 7-30 within the Colorado River Hydrologic Region. However, the groundwater has possible water quality issues and contaminants such as salinity, perchlorate and uranium concerns (City of Calexico, 2022). Per the City's Urban Water Management Plan (UMWP) approved in 2022, Calexico does not directly source water from the groundwater supplies and does not assume groundwater to become an available water source through its planning period (2045).

4.8.1.5 Flood Hazards

The Federal Emergency Management Agency (FEMA) has conducted floodplain mapping within the City. A majority of the City has been mapped as "areas determined to be outside of the 500-year floodplain"; however, the area along the New River that flows through the southwest corner of the City is subject to flooding. As shown in Figure 4.8-2: FEMA Floodplains/Floodways Regulatory Framework, areas along the New River are mapped as floodway, areas subject to a one (1) percent annual change of flood hazard (100-year floodplain), and areas subject to a 0.2 percent annual chance of flood hazard (500-year floodplain). No housing sites are within the floodplain areas.

The Imperial Dam is located approximately 60 miles east of the City on the border of California and Arizona. Thus, it is too far from the City to result in damage and will not be discussed further.

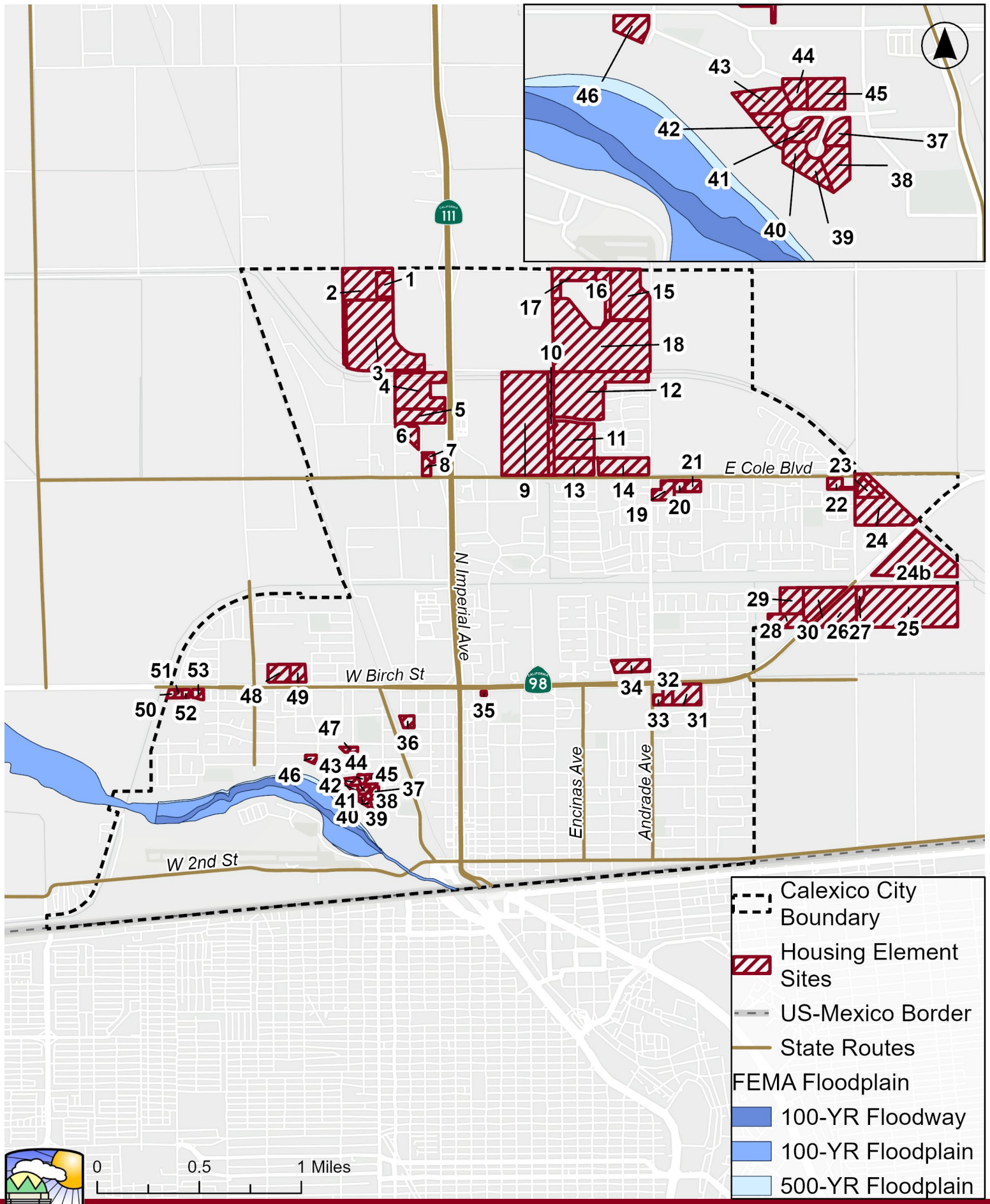


Figure 4.8-2:
FEMA Floodplains/Floodways

4.8.2 Regulatory Framework

4.8.2.1 Federal

Federal Emergency Management Agency

Imperial County (inclusive of the City of Calexico) is a participant in the National Flood Insurance Program (NFIP), a federal program administered by the Federal Emergency Management Agency (FEMA). Participants in the NFIP must satisfy certain mandated floodplain management criteria. The National Flood Insurance Act of 1968 has adopted, as a desired level of protection, an expectation that developments should be protected from floodwater damage of the Intermediate Regional Flood (IRF). The IRF is defined as a flood that has an average frequency of occurrence on the order of one in 100 years, although such a flood may occur in any given year. Imperial County is occasionally audited by the Department of Water Resources (DWR) to ensure the proper implementation of FEMA floodplain management regulations. The Flood Insurance Rate Map(s) (FIRM) for the City were examined as part of this analysis.

Clean Water Act

The federal Water Pollution Control Act, or Clean Water Act (CWA), establishes a broad national program for protecting water quality and regulating discharges of waste and pollutants into waters of the United States (Title 33, United States Code, Section 1251 et seq.). It provides authority for establishment of water quality standards and waste discharge limits for point source discharges (such as those from industrial facilities, sewage treatment plants, and stormwater). The key sections pertaining to water quality regulation are Sections 303, 311, 401, 402, and 404. The act also prohibits discharges of pollutants without a permit or other authorization and allows authorized states to implement provisions of the act in lieu of the U.S. Environmental Protection Agency (U.S. EPA).

Section 303(d)

Under CWA Section 303(d), states are required to identify “impaired water bodies” (those not meeting established water quality standards), identify the pollutants causing the impairment, establish priority rankings for waters on the list, and develop a schedule for development of control plans to improve water quality. The U.S. EPA then approves the state’s recommended list of impaired waters, or adds to, or removes water bodies from the list. Each Regional Water Quality Control Board (RWQCB) must update the CWA Section 303(d) list every two years, with the most recent update includes the 2024 reporting cycle, dated December 2024. The CWA Section 303(d) list identifies priorities for development of pollution control plans for each listed water body and pollutant. The pollution control plans triggered by the CWA Section 303(d) list are called “total maximum daily load”, or TMDLs. The TMDL is a “pollution budget” designed to restore the health of a polluted body of water

and ensure the protection of beneficial uses. The TMDL also contains the target reductions needed to meet water quality standards and allocates those reductions among the pollutant sources in the watershed (point sources, nonpoint sources, and natural sources) (40 Code of Federal Regulations [CFR] 130.2).

Section 311 Oil and Hazardous Substance Liability

Section 311 of the CWA prohibits the discharge of oil or hazardous materials to waters of the U.S. Some hazardous materials including diesel and oil would be present in heavy equipment during construction. Diesel generators are also proposed for each of the four cultivation and manufacturing facilities to provide emergency back-up power in the event of a power outage.

Section 401 Water Quality Certification

Under Section 401 of the CWA, the RWQCBs have regulatory authority over actions in waters of the United States and/or the State of California through the issuance of water quality certifications, which are issued in conjunction with a federal permit (e.g., permits issued by the USACE under Section 404 of the CWA, described below). Section 401 of the CWA provides the State Water Resources Control Board (SWRCB) and the RWQCBs with the regulatory authority to waive, certify, or deny a proposed activity that could result in a discharge to surface waters of the state. To waive or certify an activity, these agencies must find that the proposed discharge would comply with state water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued. This water quality certification is generally required for projects involving the discharge of dredge or fill material to wetlands or other bodies.

Section 402 National Pollutant Discharge Elimination System

Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES) permit program to regulate the discharge of pollutants from point sources and discharge pollutants into waters of the United States. In the state of California, the EPA has authorized the State Water Resources Control Board (SWRCB) and its nine RWQCBs to implement the NPDES program and issue permits, develop waste discharge requirements, administer 401 certifications and provide enforcement. CWA regulation calls for the implementation of best management practices (BMPs) to reduce or prevent the discharge of pollutants from MS4s to the Maximum Extent Practicable and Control Technology standards for construction stormwater.

Section 404 Permits for Dredged or Fill Material

Section 404 of the CWA regulates the discharge of dredged and fill materials into waters of the United States, which include all navigable waters, their tributaries, as well as some wetlands adjacent to the aforementioned waters (33 CFR Part 328.3).

Areas meeting the regulatory definition of waters of the United States are subject to the jurisdiction of the U.S. Army Corps of Engineers under provisions of Section 404. Construction activities involving placement of fill into jurisdictional waters of the United States are regulated by the U.S. Army Corps of Engineers through permit requirements. No U.S. Army Corps of Engineers permit is effective in the absence of the state water quality certification pursuant to Section 401.

4.8.2.2 State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act, also known as the California Water Code, is California's statutory authority for the protection of water quality. Under this Act, the State must adopt water quality policies, plans, and objectives that protect the waters of the State. The Act sets forth the obligations of the SWRCB and RWQCBs pertaining to the adoption of Water Quality Control Plans and establishment of water quality objectives. Unlike the CWA, which regulates only surface water, the Porter-Cologne Act regulates both surface water and groundwater.

California Department of Water Resources

The Department of Water Resources (DWR) is responsible for managing and protecting California's water resources, systems, and infrastructure, including the State Water Project (SWP). Some responsibilities of the DWR include preventing and responding to floods, droughts and catastrophic events, informing and educating the public on water issues, developing scientific solutions, restoring habitats, planning for future water needs and climate change impacts, constructing and maintaining facilities, generating power, ensuring public safety, and providing recreational opportunities. The DWR works with other agencies (e.g., United States Army Corps of Engineers) to benefit the State's people and to protect, restore, and enhance the natural and human environments.

Regional Water Quality Control Board

The RWQCBs serve as the frontline for State and federal water pollution control efforts. It is composed of nine control boards, each including seven members. Regional boundaries are based on watersheds; and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed. Each Regional Board makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and

taking appropriate enforcement actions. The City of Calexico is located in Region 7, the Colorado River Region.

4.8.2.3 Regional

Colorado River Regional Water Quality Control Board

The Colorado River Basin RWQCB has adopted the Water Quality Control Plan for the Colorado River Basin in accordance with criteria contained in the CWA, Porter-Cologne Act, and other pertinent State and federal rules and regulations. The intent of the Basin Plan is to provide definitive guidelines and give direction to the scope of Colorado River Basin RWQCB activities that will optimize the beneficial uses of the waters of the State within the Colorado River Basin by preserving and protecting the quality of these waters. The intended beneficial use of water determines the water quality objectives. The Colorado River Basin RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements for appropriate persons and groups; these can include individuals, communities, or businesses whose waste discharges may affect water quality. These requirements can be either State Waste Discharge Requirements for discharge to land, or federally delegated NPDES permits for discharges to surface water.

Water Quality Control Plan for the Colorado River Basin

The Water Quality Control Plan for the Colorado River Basin (or Basin Plan) prepared by the Colorado River RWQCB (Region 7) identifies beneficial uses of surface waters within the Colorado River Basin region, establishes quantitative and qualitative water quality objectives for protection of beneficial uses, and establishes policies to guide the implementation of these water quality objectives (RWQCB 2019).

Construction General Permit

Construction site stormwater management is enforced by the Colorado River Basin RWQCB and other Regional Water Boards in accordance with the State's Water Quality Order 99-08-DWQ/NPDES General Permit No. CAS000002 and Phase II Small MS4 General Permit (Order No. 2013-0001 DWQ) and NPDES Permit No. CAS000004. This State General Permit prohibits discharges of stormwater to waters of the U.S. from construction projects that encompass 5 or more acres of soil disturbance unless the discharge is in compliance with an NPDES permit. This process requires preparation and implementation of a SWPPP, which specifies Best Management Practices (BMPs) to prevent construction pollutants from contacting stormwater so that all products of erosion will be prevented from moving off-site into receiving waters. In addition, the BMPs must eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the U.S. and inspections must be performed on all BMPs implemented for the project to eliminate or reduce discharges.

Industrial General Permit

The Industrial General Permit *(SWRCB Order No. 2014-0057-DWQ)* applicable to certain categories of industrial activity, which includes facilities that store, treat, recycle, and reclaim sewage. The Industrial General Permit is applicable to treatment facilities and may be applicable to pump stations and other ancillary facilities. Final design of pump stations and ancillary facilities shall make the evaluation and determination of applicability. The Industrial General Permit requires stormwater dischargers to eliminate unauthorized non-stormwater discharges, develop and implement Storm Water Pollution Prevention Plans (SWPPPs), implement BMPs, conduct monitoring, compare monitoring results to numeric action levels, perform appropriate exceedance response actions when numeric action levels are exceeded, and certify and submit all permit registration documents.

Imperial Irrigation District

The Imperial Irrigation District (IID) is organized under the California Irrigation District Law, codified in Section 20500 et seq. of the California Water Code. Critical functions of IID include diversion and delivery of Colorado River water to the Imperial Valley; operation and maintenance of the drainage canals and facilities, including those in the project area; and generation and distribution of electricity. Several policy documents govern IID operations and are summarized below:

- The Law of the River and historical Colorado River decisions, agreements, and contracts .
- The Quantification Settlement Agreement and Transfer Agreements.
- The Definite Plan, now referred to as the Systems Conservation Plan, which defines the rigorous agricultural water conservation practices being implemented by growers and IID to meet the Quantification Settlement Agreement commitments.
- The Equitable Distribution Plan, which defines how IID will prevent overruns and stay within the cap on the Colorado River water rights.
- Existing IID standards and guidelines for evaluation of new development and define IID's role as a responsible agency and wholesaler of water.
- The Imperial Integrated Regional Water Management Plan (IRWMP) serves as the governing document for regional water planning to meet present and future water resource needs and demands.

4.8.2.4 Local

City of Calexico General Plan

The adopted 2007 Safety Element of the Calexico General Plan establishes policies and programs to protect the community from risk associated with geologic hazards (including earthquakes and secondary hazards), flooding, fire (both wildland and urban), hazardous

materials, the New River, peak load water supply and emergency access. The goals, objectives, and policies provide direction for development. Policies applicable to the project include:

2007 Land Use Element

- **Policy 4.a**: Floodways shall be kept free and clear of any structure or other obstructions.
- **Policy 4.b**: Development that encroaches into a floodplain shall meet the Federal Emergency Management Administration ("FEMA") requirements.

2007 Public Facilities/Services Element

- **Policy 4.a**: The City shall continue to require developers to construct or finance the necessary storm water runoff facilities such as underground storm drains and retention basins.
- **Policy 4.b**: The City should continue to work with the appropriate agencies to develop new arrangements for the discharge of storm water into the New River. To the extent feasible, these arrangements shall be consistent with the New River Improvement Project referenced and described in Section 5.2.5 of the Conservation/Open Space Element.
- **Policy 4.c**: The City shall continue to work with IID to provide adequate storm water discharge in areas where applicable and in new development.
- **Policy 4.d**: Continually monitor the existing storm water system to identify any necessary improvements to maintain high quality service.

2007 Conservation/Open Space Element

- **Policy 1.e**: Promote water conservation, reduce urban runoff, and prevent groundwater contamination within development projects, property maintenance, City operations, and all other related activities requiring City discretionary approval.
- **Policy 1.f**: Adopt and enforce regulations and engage in educational efforts to eliminate pollution from runoff.
- **Policy 1.g**: Participate in any pertinent local, regional, state, and federal programs to protect and enhance water quality.
- **Policy 1.h**: Support efforts to improve the water quality of the New River or other proposals aimed at improving the area surrounding the River, such as the development and implementation of an integrated regional water quality management plan that meets the goals and objectives of the Colorado River Basin Regional Water Quality Control Board (Region 7) for the New River.

- **Policy 2.c**: Soils with moderate or high permeability capacity should be left in undeveloped (perhaps used as open space where appropriate) to reduce runoff and facilitate groundwater recharge.

2007 Safety Element

- **Policy 3.a**: The City shall ensure the adequacy of existing emergency preparedness plans to handle effectively and efficiently known hazards and emergencies.
- **Policy 3.b**: The City shall review evacuation procedures to make sure that in case of an evacuation, the residents of Calexico will be quickly notified and the evacuation will be orderly.
- **Policy 3.c**: The City shall work with the Calexico Water Department to ensure that an adequate supply of water will be available in the event of an emergency and to help create and maintain an emergency water supply.
- **Policy 3.f**: The City shall cooperate with IID to prepare or update an emergency plan for the rapid removal and repair of downed power lines and/or damaged/ breeched water facilities in the event of an earthquake.
- **Policy 4.a**: The City shall continue to restrict access to the river and maintain bilingual signs that warn of the dangers of contact with the water.
- **Policy 4.b**: The City shall continue to seek county, state, or federal funds to cover costs incurred by the City for work done to restrict public access to the river or any other measure associated with the river due to its pollution or risk to public safety.
- **Policy 4.c**: The City shall cooperate with international, federal, state and regional responsible agencies in projects aimed at cleaning up or encasing the New River through the implementation of the New River Improvement Project as described in 5.2.5 of the Conservation Element.
- **Policy 4.d**: The City shall prohibit land development near the New River in order to reduce exposure of its residents to the potential contact with the water, odors, and airborne foam.

Municipal Code

Title 3 Chapter 3.32 Development Impact Fees

There are several development impact fees in the Municipal Code. These fees impose on new development the costs of constructing public facilities, which are reasonably related to the impacts of the new development. The fee for drainage improvements is calculated on a project-by-project basis. Future projects would be required to pay the appropriate development impact fees determined by the City during the entitlement review process and prior to any issuance of building permits.

Title 13 Chapter 13.50 Urban Storm Water Quality Management and Discharge Control

Calexico Municipal Code Title 13, Chapter 13.50 (Urban Storm Water Quality Management and Discharge Control) implements the City's legal authority under CWA Section 402 and the Porter-Cologne Water Quality Control Act, as reflected in the city's current NPDES permit. The chapter is intended to improve storm water quality within MS4 and receiving waters and protect public health, safety, and general welfare; reduce pollutant discharges through management practices applicable to the city, residents, businesses, and property owners; support the beneficial use of storm water as a resource; and, ensure compliance with state and federal law. This chapter accomplishes this by establishing the City's authority to prohibit illicit discharges and connections to the MS4, adopt minimum storm water management and source control requirements to prevent and reduce pollution, require development project site design measures that reduce storm water pollution and erosion, and regulate storm water flows from development projects to prevent erosion and protect water-dependent habitats. Additionally, this section of the code directs conditions of approval to utilize the CASQA's Construction Best Management Practice Manual for construction activities guidance.

Title 15 Chapter 15.54 Flood Damage Prevention

Calexico Municipal Code Title 15, Chapter 15.54 (Flood Damage Prevention) establishes the City's regulatory authority to adopt flood hazard regulations to promote public health, safety, and general welfare by minimizing public and private losses due to flood conditions. The standards apply to areas of special flood hazard within the city as defined in Section 15.54.050. Specifically, Section 15.54.140 provides detailed standards of construction applicable to all areas of special flood hazard including types of construction materials, elevation requirements, and floodproofing design standards. It also includes standards for flood hazard reduction within floodways.

Calexico Storm Water Program

The proposed project lies within the jurisdiction of the Colorado River Basin Regional Water Quality Control Board and is subject to the waste discharge requirements of the Phase II Small MS4 General Permit (Order No. 2013-0001 DWQ) and NPDES Permit No. CAS000004. The Cities of Imperial and El Centro, Calexico, Brawley and the County of Imperial are enrolled under the State Water Board General Order for Phase II MS4s. These Phase II MS4s (municipalities) are required to implement various storm water management programs, one of which is to require certain new development and applicable redevelopment projects to incorporate post-construction storm water control measures into their design that include LID and hydromodification techniques.

Small projects (2,500 to < 5,000 square feet) within the City are conditioned to implement one or more Site Design Measures that "treat" storm water runoff using methods to evapo-transpire, infiltrate, harvest and reuse, or biotreat, while large projects (5,000 square feet or more) are required to implement into their design and on-going activities specific Source Control Measures to minimize the impact of pollutant-generating activities. Because much of the City's storm drain system connects directly to streams and rivers, pollutants such as oils, grease, litter, pesticides, fertilizers, and animal waste can enter receiving waters, including the New River and the Salton Sea, if not properly managed. To reduce these discharges, the City implements, and requires residents, businesses, municipal facilities, and property owners to implement, a variety of best management practices (BMPs).

Calexico Urban Water Management Plan

The City's Urban Water Management Plan (UWMP) serves as a long-range planning document for water supply, a source of data for development of a regional water plan, and a source document for the City for the purpose of preparing General Plan Updates.

The UWMP discusses the quality of the City's potable water supply sources, including imported water from the Colorado River. The UWMP well as provides drinking water standards and the effect that water quality has on management strategies and supply reliability.

The UWMP states that the City currently does not pump groundwater, however it recommends the City implement water operation management tools that maximize the use of local groundwater production and decrease the need for imported water.

4.8.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts to public services and recreation would be significant if the proposed project would:

1) Threshold 1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2) Threshold 2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3) Threshold 3: 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:
    a. result in a substantial erosion or siltation on- or off-site;
    b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
d. impede or redirect flood flows.

4) Threshold 4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5) Threshold 5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.8.4 Methodology

The potential for significant impacts associated with the project is based upon review of existing secondary source information and data relative to the available hydrology and water quality data, plans, and policies applicable to the City.

4.8.5 Issue 1 and 5: Water Quality

Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

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

4.8.5.1 Impact Analysis

Construction

The proposed project is a programmatic planning effort consisting of the Housing Element Update and associated rezoning actions. These actions establish the policy and regulatory framework for future development but do not approve or authorize specific development projects. Buildout of the proposed project would, however, involve the construction of additional residential and industrial land uses throughout the project area. Construction activities, such as excavation, grading, soil compaction, and soil stockpiling could increase soil erosion. These earthmoving activities in areas with a history of commercial or agricultural use may release existing contaminants such as nutrients, pesticides, and oils. Exposed soils could be eroded and deposited into the surrounding water bodies, increasing sediment loads and turbidity, while accidental spills or releases of construction-related chemicals and fuels could adversely alter the chemistry of receiving waters.

Any development involving clearing, grading, or excavation that causes soil disturbance of one (1) or more acres is subject to the NPDES Construction General Permit provisions. Compliance with the NPDES Construction General Permit would trigger preparation of an erosion and sediment control plan or a SWPPP where a project is required to prepare a SWPPP. The erosion and sediment control plan shall contain at a minimum, appropriate site-

specific construction site BMPs, the rational used for selecting or rejecting BMPs, a quantification of expected soil loss from the BMPs, a list of applicable permits, and evidence that permits have been obtained. The minimum standard BMPs include: erosion and sedimentation prevention; protection of stockpiled materials; proper storage and handling of potentially hazardous materials such as fuels, oils, and solvents; containment of non-stormwater runoff (e.g., equipment washing); proper trash and debris disposal; and slope stabilization. As a condition of approval for a grading or building permit the property owner must show compliance with these requirements during construction.

All construction associated with buildout of the proposed project would comply with existing State and City regulations through the implementation of BMPs for stormwater pollution prevention. Construction activities would minimize pollutant discharge from construction activities to the extent feasible. Therefore, construction of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

Operations

As part of long-term operation of projects, water quality impacts could result from use of common household materials used in landscaping and residential uses that may result in the generation of runoff pollutants such as sediments, oils and grease, heavy metals, pesticides, fertilizers, trash and debris, oxygen-demanding substances, and bacteria and viruses, which are typical for residential and mixed uses. In addition, new development would result in greater vehicular use of roadways, which could potentially increase contaminants that would be carried in runoff and discharged into receiving waters. Therefore, nonpoint source pollutants would be the primary contributors to potential water quality degradation as a result of project buildout. Nonpoint source pollutants could be washed by rainwater from rooftops, landscaped areas, parking areas, and other impervious surfaces into the on-site drainage system.

Future development, whether discretionary or by right, would be required to adhere to all applicable water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's General Plan, Municipal Code, and Storm Water Program (including WQIP and MS4 Permit), BMP Design Manual, NPDES General Construction Permit, as well as all regulations related to water quality. The General Construction Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan, which must include erosion and sediment control BMPs that would meet or exceed measures required by the NPDES General Permit, as well as BMPs that control hydrocarbons, trash and debris, and other potential construction-related pollutants.

Therefore, through regulatory compliance impacts related to water quality standards and waste discharge requirements would be less than significant. Likewise, future development as a result of the proposed project would not conflict with or obstruct implementation of a water quality control plan.

4.8.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.8.5.3 Significance After Mitigation

While implementation of the proposed project has the potential to increase the amount of pollutants discharged into surface waters, all future development, whether discretionary or by right, would be subject to federal, State, and local regulations aimed at controlling water quality impacts. Therefore, potential water quality impacts would be **less than significant**.

4.8.6 Issue 2: Groundwater

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

4.8.6.1 Impact Analysis

The proposed project is located within Groundwater Basin No. 7-30, also known as the Imperial Valley Groundwater Basin, which is part of the Colorado River Hydrologic Region. As described previously, the City of Calexico does not utilize groundwater due to potential water quality concerns, including salinity, perchlorate and uranium concerns (Calexico 2022). Consistent with the UMWP, Calexico does not directly source water from the groundwater supplies and does not assume groundwater to become an available water source through its planning period (2045).

The housing sites consist of properties that are currently undeveloped but were previously used for agriculture, and all are within an urbanized area. Future development is expected to result in only minor changes to groundwater recharge, with effects varying depending on existing site conditions. Sites that are currently developed could see increased infiltration where new landscaping and more stringent site design regulations are implemented, while currently undeveloped sites could see reduced infiltration where new impervious surfaces are introduced. Additionally, construction of any given future project is not anticipated to use groundwater.

Therefore, construction and operation of the propose housing sites would not substantially decrease the groundwater supplies or interfere substantially with groundwater recharge

than it is already impacted. The impacts would be less than significant at this programmatic level of review.

4.8.6.2 *Mitigation Framework*

Impacts would be less than significant. No mitigation is required.

4.8.6.3 *Significance After Mitigation*

Impacts would be **less than significant**. No mitigation is required.

4.8.7 Issue 3: Drainage Patterns/Stormwater Runoff

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

a. *result in a substantial erosion or siltation on- or off-site;*
b. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*
c. *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
d. *impede or redirect flood flows?*

4.8.7.1 Impact Analysis

(a) result in a substantial erosion or siltation on- or off-site;

Construction activities associated with implementation of the proposed project would temporarily alter localized existing drainage patterns. As discussed in Issue 1, construction activities could increase soil erosion due to earthmoving activities such as excavation, grading, soil compaction and moving, and soil stockpiling, resulting in sediment transport in runoff. Any proposed development involving a construction activity must create an erosion and sediment control plan that utilizes site-specific construction site BMPs, that is consistent with the C ASQA Construction Best Management Practice Manual, as adopted by resolution of the city council. If the project disturbs one acre or more of soil or disturbs less than one acre but is part of a larger common plan of development or sale of one or more acres of disturbed surface land is subject to the NPDES Construction General Permit provisions requiring development and implementation of a SWPPP with associated BMPs to control erosion. If a project requires a SWPPP, it can substitute for the erosion and sediment control plan. Approvals of construction permits require the property owner's commitment to implement City-approved BMPs to prevent discharges that cause or contribute to soil erosion or siltation. Compliance is monitored through documentation such as notices of intent, SWPPPs, inspection reports, and monitoring results, which the City may require to

verify adherence to applicable city ordinances and the City's NPDES permit governing MS4 discharges.

Future development has the potential to alter drainage patterns by increasing impervious surfaces, which have a lower absorption rate for rainfall than that of vacant natural lands. However, strict compliance with the City's Post-Construction Standards Plan, CMC Chapter Title IV Chapter13.50, and the Phase II MS4 Permit would require the retention and infiltration of waters on-site and avoidance of changes to drainage velocities during both construction and operation, thereby avoiding notable increases in erosion and siltation. Therefore, through regulatory compliance, impacts related to erosion and siltation associated with implementation of the proposed project would be less than significant.

(b) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Future development could result in increased surface runoff due to the construction of additional structures, walkways, and parking areas within the housing sites. Consistent with the City's relevant General Plan policies and Municipal Code provisions (CMC Chapter Title IV Chapter 13.50), all future development, whether discretionary or by right, would be required to ensure the maintenance of stormwater facilities and flows to ensure the project would not result in increased surface runoff or redirect existing flood flows. Implementation of applicable storm water BMPs and erosion control measures would be required to retain flows on-site and minimize the velocity of storm water runoff. Such BMPs could include planting trees, rooftop drains directed to permeable areas or rainwater collection systems, use of porous pavement, or vegetated swales. Additionally, the inclusion of LID design standards as outlined in the Post-Construction Standards Plan would assist in the slowing of runoff flows, and even potentially treat polluted runoff prior to entering the storm drain system. Project-specific studies would be required to ensure that volume-based treatment LID BMPs are properly sized to infiltrate, filter, or treat the remaining portion of the runoff volume that was not retained or treated by other BMPs to maintain flows and ensure future projects would not redirect flood flows or alter the course of a stream or river. Through these project-specific measures, impacts related to increased or redirected surface runoff associated with development of the housing sites would be less than significant.

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

Implementation of the proposed project would not result in substantial changes to the overall drainage patterns within the City, as storm water runoff from the project areas would be collected by the existing storm water conveyance system, and ultimately discharged into

the New River, which connects to the Salton Sea. Future development, whether discretionary or by right, would be required to comply with applicable state and local regulations, including preparation of project specific Stormwater Quality Management Plans, erosion and sediment control plans, drainage plans, and pollution control plans. Projects classified as regulated projects would be required to reduce runoff volume by sizing each treatment facility to meet one of two hydraulic design criteria specified in the Phase II MS4 Permit. The City's Post-Construction Standards Plan establishes how a project determines facility sizing and which site design and treatment control measures to use, such as retention and detention basins and soil quality improvement measures, to reduce the volume of runoff directed to the storm water drainage system and prevent it from being overwhelmed. Additionally, the Development Impact Fee (DIF) requires new development to provide funds for the installation of drainage improvements commensurate with a development application. Through compliance with these regulatory requirements and payment of the DIF, impacts related to exceeding the capacity of the storm water system associated with implementation of the proposed project would be less than significant.

(d) impede or redirect flood flows?

As discussed in the Existing Conditions, the housing sites are located outside the 500-year flood area per FEMA's flood map and future development on these sites would not impeded or change the direction of the floodway. Implementation of site specific BMPs and Site Design Measures required under the Municipal Code and the Phase II MS4 Permit would help maintain flood flows consistent with existing conditions. Combined with continued management of storm drain facilities, including the AAC and tributary canals, these measures would ensure that future buildout of the housing sites would not substantially increase the rate or amount of surface runoff in a manner that could result in on- or off-site flooding or exceed the capacity of the drainage system. Therefore, impacts would be less than significant.

4.8.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.8.7.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.8.8 Issue 4: Flood Hazard/Tsunami Inundation

Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

4.8.8.1 Impact Analysis

As shown in Figure 4.8-2, the housing sites are located outside the floodplain and any flood hazard area of the New River. It is plausible that flooding impacts could occur from increases in the amount of runoff delivered to the canals and river. However, the potential for river flooding impacts is typically addressed through management of local surface runoff. The City's General Plan Land Use Element specifically prohibits development within floodways (Policy 4.a) and requires that any development encroaching into a floodplain meet the FEMA requirements (Policy 4.b). Additionally, Municipal Code Chapter 15.54, Flood Damage Prevention, reduces flood hazards within floodways by prohibiting encroachments unless a registered professional engineer or architect certifies that the encroachment would not increase in flood levels during the occurrence of the base flood discharge. The project does not propose construction of new housing or other development; rather, it provides capacity for future development consistent with state housing element law. Buildout of the housing sites would require adherence to all applicable state and local development regulations, including the City's General Plan and Municipal Code (Chapter 15.54), which establishes flood damage prevention standards and development prohibitions within floodways. With these regulatory requirements in place, along with the storm water retention and on-site infiltration measures discussed previously, future development at the housing site would not be expected to contribute to flooding issues. Therefore, at this programmatic level of review, impacts related to flood hazards associated with development of the housing sites would be less than significant.

The City is located approximately 100 miles inland from the Pacific Ocean as in not in a tsunami zone. There are no known state-designated seiche hazard zones located in or immediately adjacent to Calexico. Calexico is relatively flat and is not adjacent to a large natural lake or reservoir where earthquake-induced seiches are a recognized planning concern. Therefore, there is no potential for the Project parcels to be inundated by seiches, tsunamis, or mudflows.

4.8.8.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.8.8.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.9 Land Use and Planning

This section analyzes potential impacts related to land use that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). The analysis in this section contains an evaluation of the project's consistency with local and regional plans and policies as well as state planning initiatives. It also evaluates compatibility in the context of existing and planned land uses in the surrounding area.

4.9.1 Existing Conditions

The City encompasses approximately 5,517 acres (8.62 square miles) and is located within the County of Imperial (County), about 200 miles southeast of Los Angeles 120 miles east of San Diego, and 60 miles west of Yuma. Regional access to the City is primarily provided by State Route (SR) 111, which intersects the City in a north-south orientation, and SR 98, which provides east-west connectivity. Interstate 8 is located approximately 10 miles north of the City and provides regional access to San Diego, Yuma, and the broader Southern California and southwestern United States region. Beyond City limits, the City's Sphere of Influence also includes approximately 4,356 acres, along the City's north, east, and western boundaries.

The regional location of Calexico is shown in Figure 2-1, Regional Location, in Chapter 2, Environmental Setting. Urban development within the City generally consists of residential, commercial, industrial, public facility, transportation, and border-related land uses concentrated near the downtown area and along major transportation corridors and ports of entry. The City is located within the relatively flat desert terrain of the Imperial Valley at an elevation of approximately 10 to 50 feet below mean sea level. The climate is characterized by hot, arid conditions with limited annual rainfall and high summer temperatures typical of the Colorado Desert region.

As discussed in Chapter 2, Environmental Setting, surrounding land uses outside the City limits are predominantly agricultural and include irrigated farmland and associated agricultural infrastructure characteristic of the Imperial Valley region. Under the Imperial County General Plan, lands within the City's Sphere of Influence are designated Urban to the west, Specific Plan Area to the northwest (covering the Heber community), and Urban and Agriculture to the east. The New River traverses the southwestern portion of the City and serves as a prominent physical and environmental feature within the urban area.

4.9.1.1 Existing City-wide Land Uses and Development Patterns

The City's General Plan Land Use Map is shown in Figure 4.9-1, General Plan Land Use Map, with enlarged excerpts focused on the housing sites in Figure 4.9-1a-e, Land Use Map Sites. The existing land uses are shown in Figure 2-3, Existing Land Uses, and the Zoning Map is shown in Figure 2-4, Existing Zoning Map. As shown therein, residential uses make up most City land uses. The remaining land uses include commercial, industrial, public facilities, and open space-type uses.

Parcels that comprise the rezone sites consist of vacant, or nonvacant but underutilized sites. 40 sites are vacant, with 13 sites identified as non-vacant. Additionally, the Bowker site is identified as being vacant. The non-vacant sites are primarily agricultural row crops and mostly vacant sites without permanent structures that are occupied by intermittent uses, such as outdoor storage.

A summary of the General Plan land use designations is provided below. Existing land use designations on the housing sites include Low, Medium, and High Residential, Neighborhood Commercial, Commercial Highway designations, Industrial, and Public Services designations.

Agriculture Use

Agriculture uses in the City represent a continuing connection with the heritage of the City while also providing a holding area for future development. Any change in the land use in this area will be accompanied by a Specific Plan which details the development, facility phasing, and cost/benefit to the community (Calexico 2007).

Residential Land Uses

Residential development in Calexico is governed by the maximum allowable density established for each residential land use designation. These density standards are measured by the maximum number of dwelling units permitted per net acre. The residential land uses in the City include the following:

- **Rural Residential**: The Rural Residential land use designation is intended to permit the continuation of agricultural and farm uses while allowing the development of single-family residential units at a very low density. The density range applicable to this category is 0.5 to 1 dwelling unit per net acre.
- **Low Density Residential**: The Low Density Residential land use designation covers some of the existing single-family residential areas within the City limits and allows for low density residential development in portions of the Sphere of Influence and within residential specific plans. The density range of this category is 1 to 5 dwelling units per acre with no more than one (1) dwelling unit per lot.

- **Medium Density Residential**: The Medium Density Residential land use designation is intended to bridge the gap between detached single-family residential and attached owner-occupied units. This category includes densities ranging from 5.1 to 12 dwelling units per acre.
    - This land use designation also supports Mobile Home Parks.
- **High Density Residential**: The High Density Residential land use designation allows for the greatest diversity and highest density of residential development, providing for a full range of multi-family dwellings, including, but not limited to, condominiums, apartments, duplexes, triplexes, fourplexes, and other multiple-unit buildings. This category has a density range from 12.1 to 20 dwelling units per acre and is generally, but not always, developed as an attached product.

Existing residential uses in the City are primarily composed of low density, single-family detached units on standard subdivision lots. This type of residential development is found in all sections of the City. A small percentage of single-family attached housing units, multi-family housing, including apartments and condominiums, and mobile homes, comprises the rest of the housing units present in the City.

Commercial

The Commercial land use designation accommodates a range of retail, service, office, and mixed-use development intended to serve neighborhood, community, and regional needs. These areas support economic activity, provide access to goods and services, and promote strategically located commercial centers that enhance community connectivity and support local employment opportunities.

Existing commercial uses in the City are primarily concentrated along W 2nd Street and N Imperial Ave., with small retail stores and commercial services dispersed throughout the City. There are three types of commercial land use in the City:

- **Commercial Neighborhood:** Provides neighborhood-serving retail centers, typically 10–15 acres in size, located near residential areas and major intersections. Intended to accommodate grocery stores, pharmacies, and other daily shopping and service needs.
- **Commercial Highway:** Accommodates auto-oriented commercial uses such as automobile dealerships, restaurants, hotels, motels, and large retail establishments. Commercial Highway is designed to concentrate commercial activity in planned shopping centers, enhance corridor aesthetics, and reduce traffic conflicts along major highways.
- **Community Core Commercial:** Supports a mix of commercial, office, civic, and community-serving uses within and around the downtown core. Community Core

Commercial encourages pedestrian-oriented development, mixed-use residential, public services, transit facilities, and neighborhood-serving retail, while excluding hotels and motels.

Industrial

The Industrial land use designation is intended to accommodate a range of industrial and employment-generating uses while minimizing potential conflicts with existing and future residential areas. Industrial development is concentrated in strategic locations throughout the City, including areas near the airport, major transportation corridors such as Heber Road and Interstate 7, the East Port of Entry, and along railroad lines to support businesses that rely on air, truck, or rail access. Permitted uses include light industrial operations, research and development facilities, industrial incubators, warehousing and distribution centers, and activities such as fabrication, assembly, processing, packaging, and storage, with limited supporting retail. The designation also reinforces Calexico's agricultural economy by preserving opportunities for rail-served agricultural and industrial operations, including businesses associated with cross-border manufacturing and maquiladora-related industries.

Existing industrial development in the City is comprised of light industrial use concentrated in the western area surrounding N Imperial Ave and Cesar Chaves Blvd./the railroad.

Airport

The Calexico International Airport is in the southwest region of the City, above W 2nd St. and to the west of Cesar Chavez Blvd/the railroad. The Unites States Customs and Border Protection checkpoint also occurs in this area of the City. In addition to these transportational uses, two water towers are located in this vicinity.

Business Park

Accommodates low-intensity, nonpolluting industrial, research and development, and business uses within campus-style business park settings. Intended to support employment growth through clean industries that minimize noise, emissions, truck traffic, and waste, with key locations near Highway 98 and the Eastern Port of Entry as well as the northwest portion of the city.

Public Facilities

The Public Facility land use designation serves as a prefix for a variety of public delineated land use areas. It is used to recognize such uses as the Civic Center and governmental offices, library, schools, hospitals, parks, police and fire stations, and other publicly-owned facilities. Such uses should be provided at levels adequate to serve the community. Public facility uses are generally spread out among the City.

Open Space

The Open Space land use designation protects open space areas that are not intended for public recreational use. Typical uses include environmentally sensitive lands, retention basins, irrigation and drainage canals, and other natural or publicly owned areas preserved for resource protection, flood control, or conservation purposes.

Palazzo Specific Plan

In 2007, the City processed the Palazzo Specific Plan and Tentative Map to construct a maximum of 1,231 residential units, a mixed-use village center, a regional park, pedestrian linkages and streets, retention basin, and an optional school facility. The Palazzo Specific Plan applies to Housing Element sites 15, 16, 17, and 18. Under the Palazzo Specific Plan, the residential density would range between 12 and 18 dwelling units per acre (du/ac). The Palazzo Specific Plan has yet to be implemented, however, the proposed land use and zoning designations as part of this project remain consistent with the Palazzo Specific Plan.

4.9.1.2 Existing Project Area Zoning

Table 3-2, Sites Inventory, lists the existing land use designations and zoning for the rezone sites. All sites are proposed to be rezoned to allow residential uses (or increase allowable residential density), except for one site located on Bowker Road which will be rezoned for industrial use. Approximately half of the rezone sites are currently zoned for residential uses, while the other half are currently zoned Commercial Highway (CH), Neighborhood Commercial (NH), Public Facilities (PF), Commercial Office (CO), and Industrial (I).

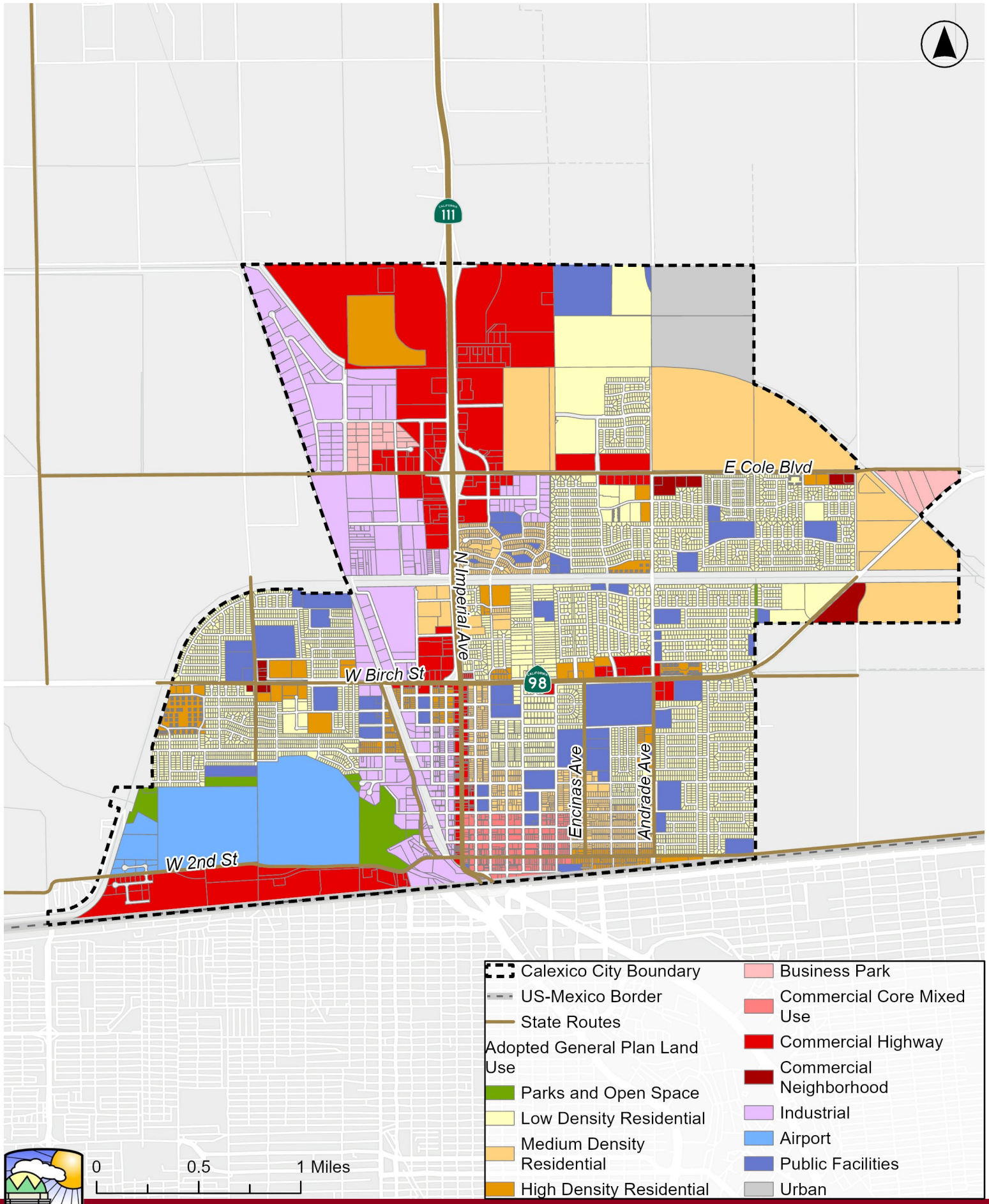


Figure 4.9-1:
General Plan Land Use

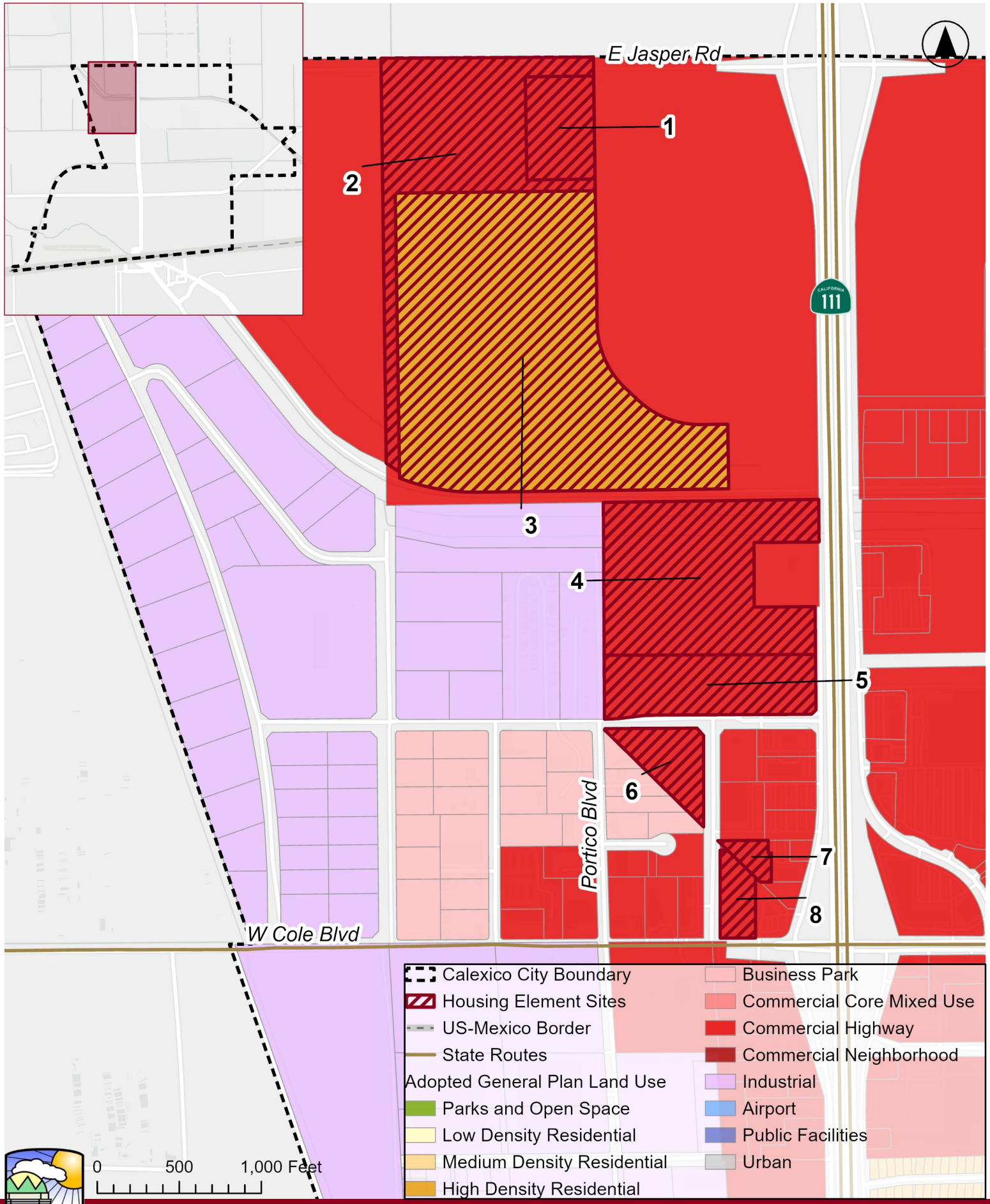


Figure 4.9-1a:
Land Use Sites 1-8

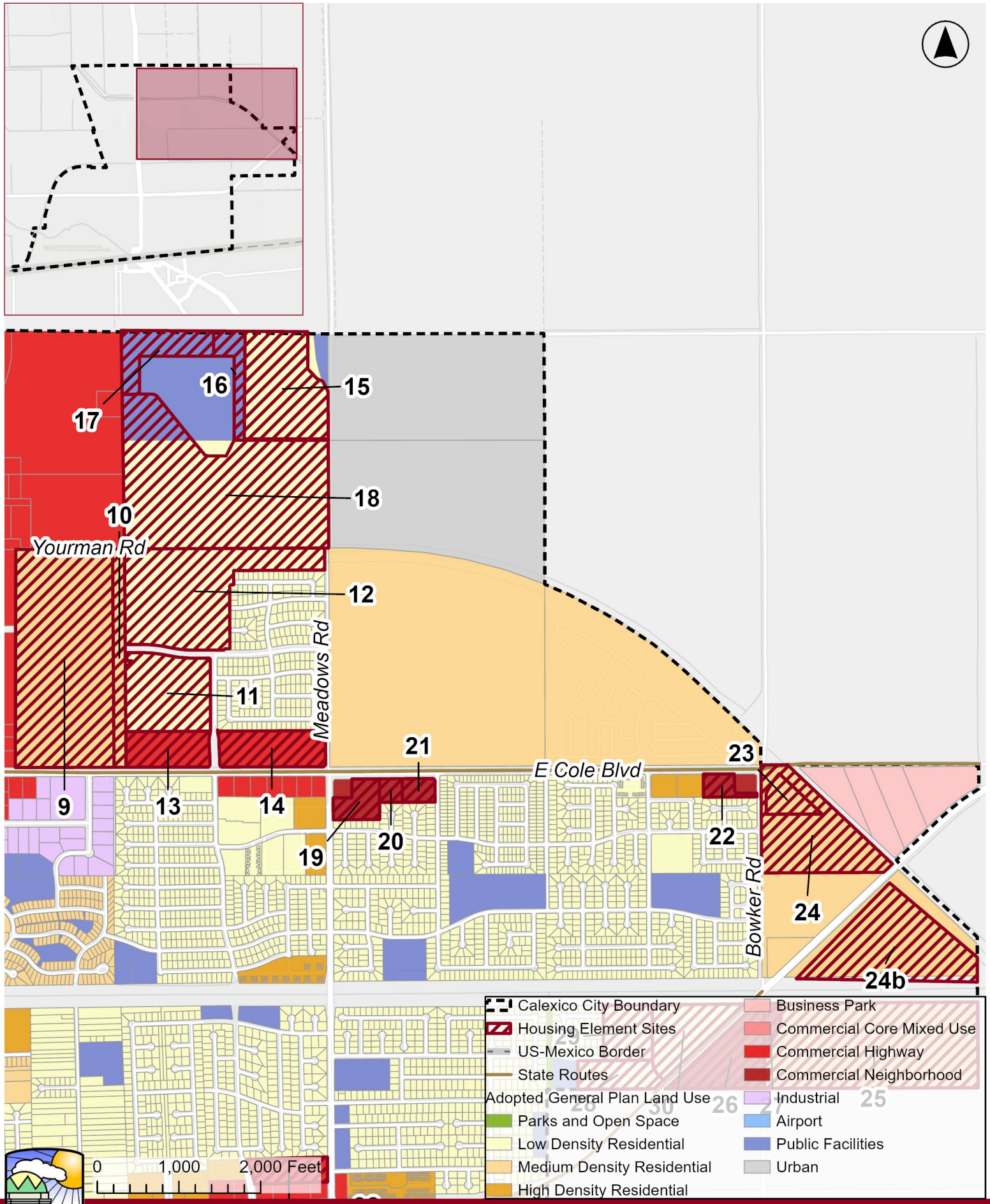


Figure 4.9-1b:

Land Use Sites 9-24b

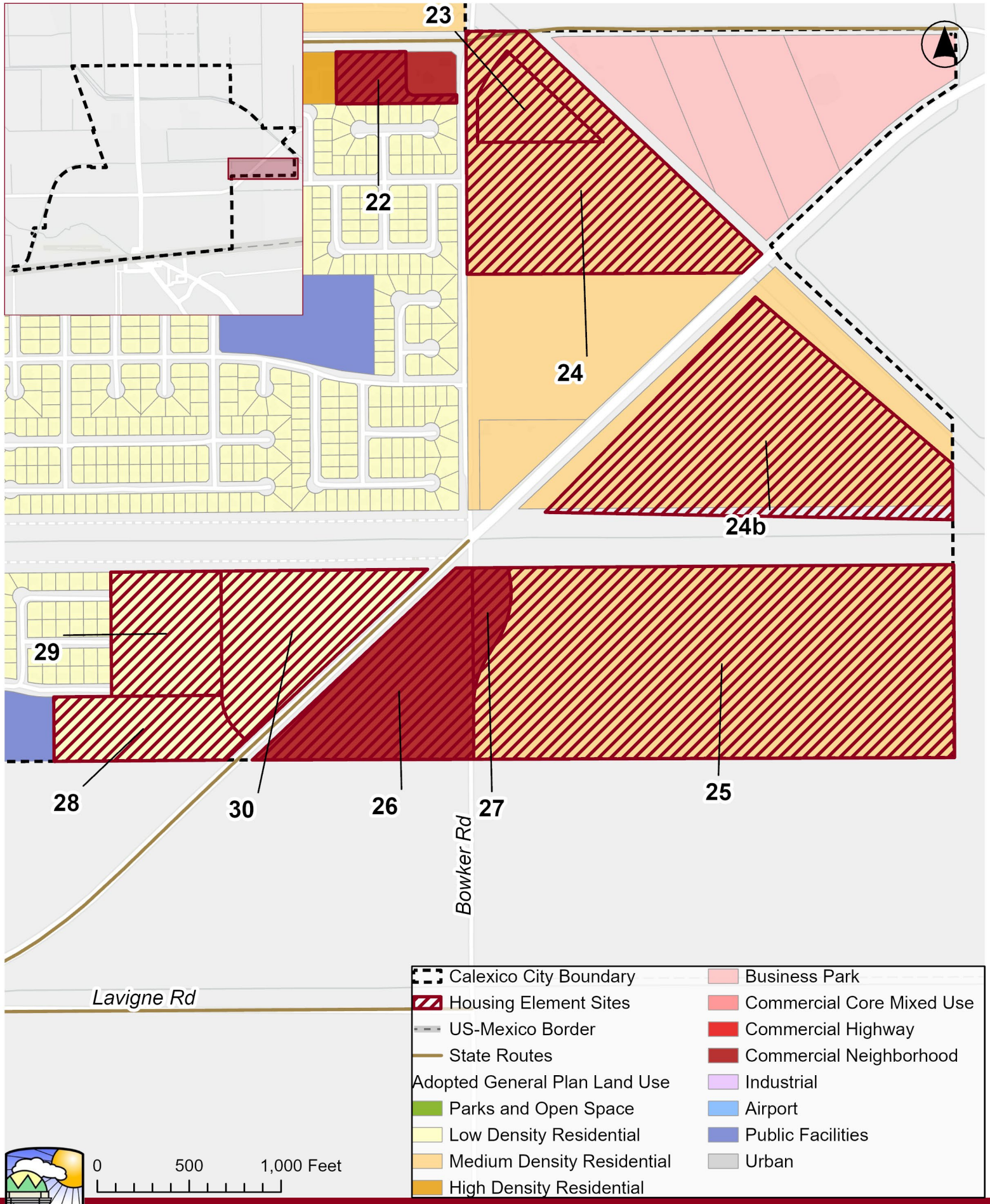


Figure 4.9-1c:
Land Use Sites 25-30

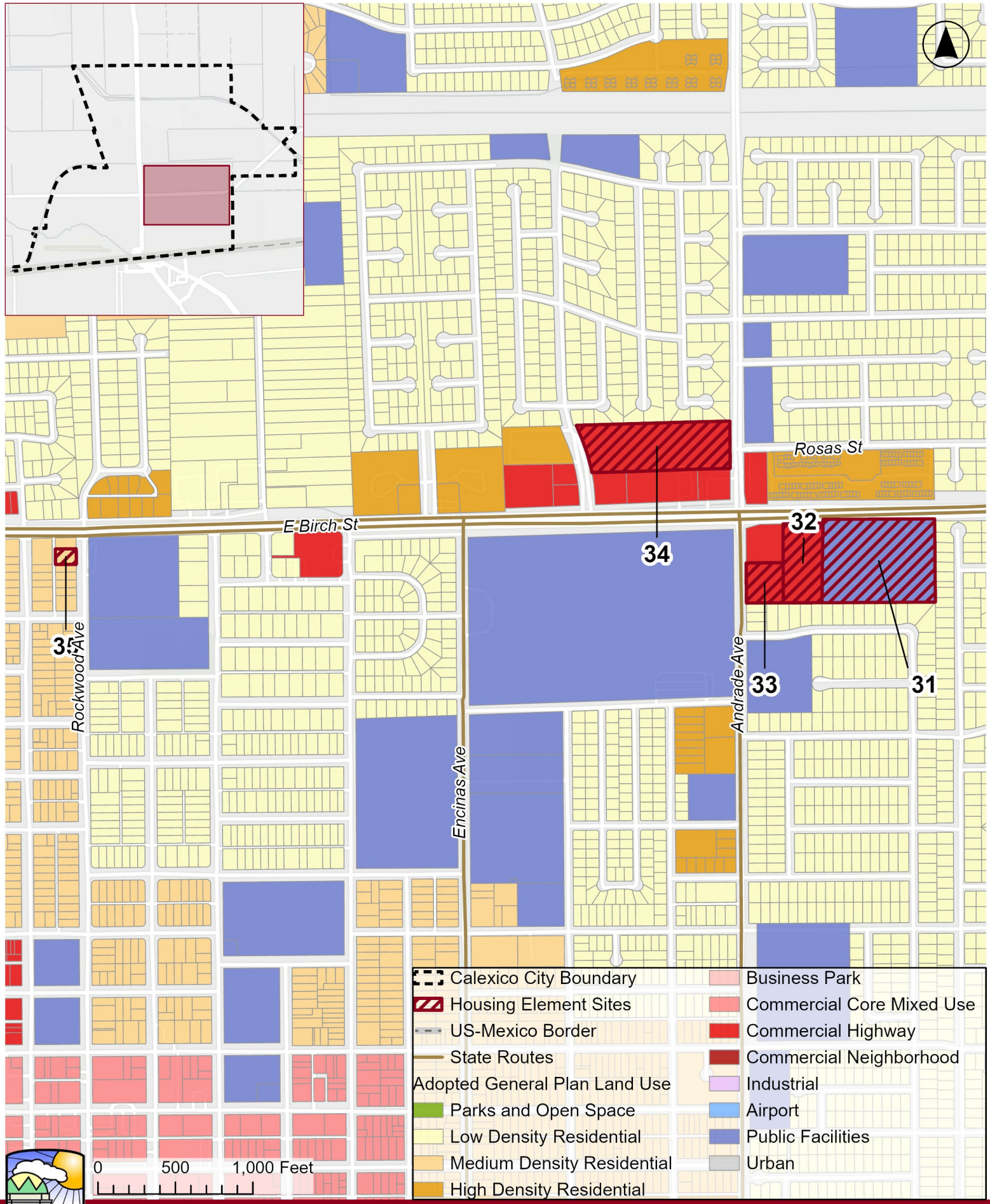


Figure 4.9-1d:
Land Use Sites 31-35

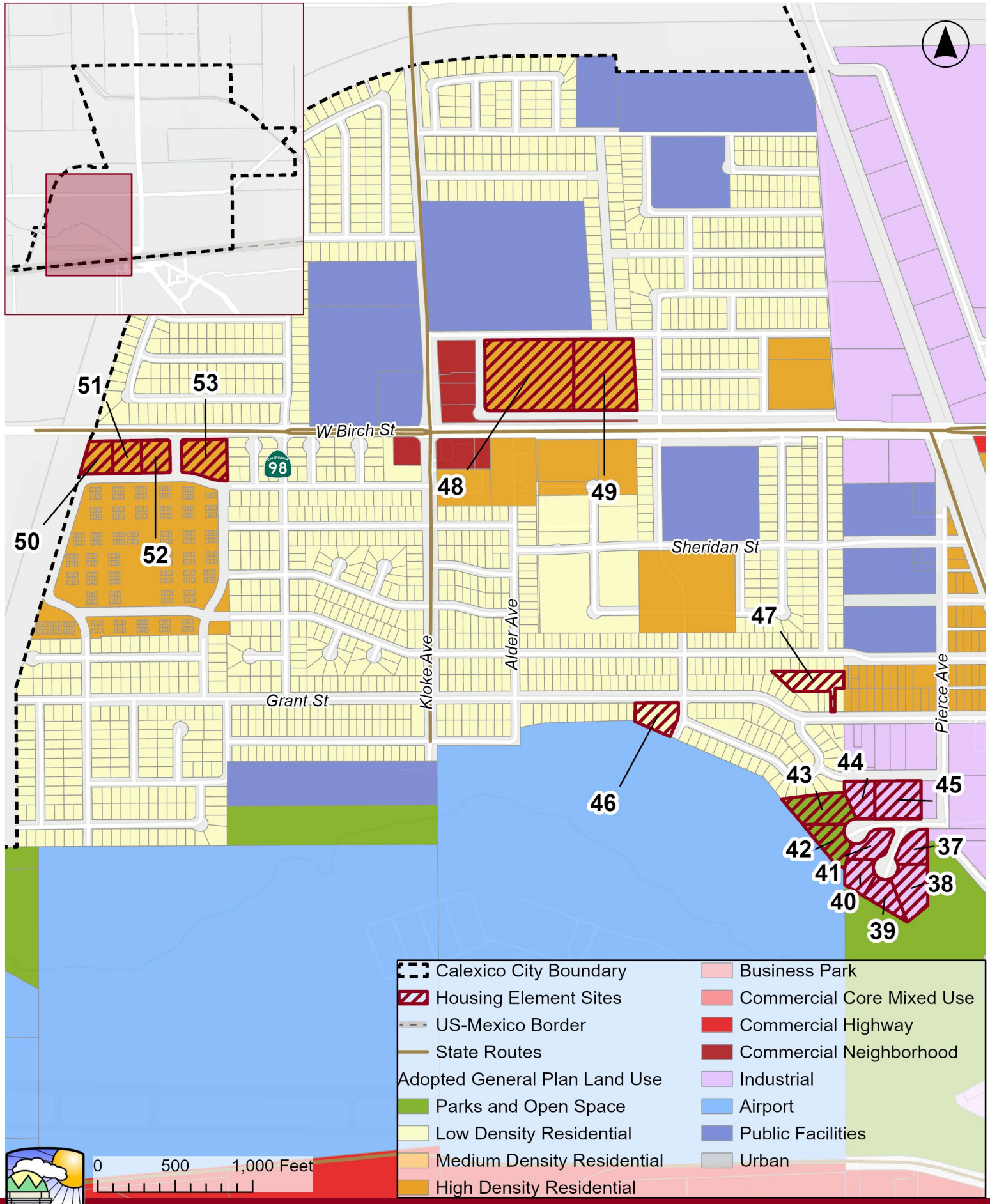


Figure 4.9-1e:
Land Use Sites 36-53

4.9.1.1 Surrounding Communities/Land Uses

Land uses surrounding the City vary by direction. To the north, the City is bordered primarily by farmland in Imperial County, with the unincorporated community of Heber located approximately two to four miles farther north. To the south, the City is bounded by the U.S.-Mexico border and adjacent urban land uses in Mexicali, including residential, industrial, and commercial uses. To the east, the City is bordered primarily by farmland in Imperial County. To the west and northwest, the railroad separates the City from industrial and agricultural land. To the southwest, the All-American Canal separates Calexico from farmland and the Mt. Signal solar farm.

Imperial County Agricultural Land

Outside the City's developed urban area, the surrounding land is largely characterized by active agricultural operations in unincorporated Imperial County. Agricultural uses include irrigated cropland and associated agricultural infrastructure that support the regional economy. These agricultural areas are generally located north, east, and west of the City limits and are interspersed with irrigation canal and drainage facilities, managed by the Imperial Irrigation District (IID), and rural roadways managed by the County of Imperial. Future development within the City is generally intended to occur within the existing urbanized footprint to reduce encroachment into and preserve productive agricultural lands.

Heber Unincorporated Community

The unincorporated community of Heber is located approximately 2-4 miles north of Calexico and consists primarily of low-density residential, agricultural, commercial, and community-serving land uses. Heber serves as a nearby residential and agricultural community within Imperial County and is connected to Calexico by regional transportation corridors including State Route 111.

City of Mexicali, Baja California, Mexico

The southern boundary of Calexico is defined by the international border with Mexicali, a major urban center that forms part of the Calexico–Mexicali binational metropolitan region. Mexicali has an estimated population of approximately 870,000 and contains a mix of residential, commercial, industrial, governmental, and manufacturing land uses, serving as an important economic and employment center for the region. The Calexico East and Downtown Ports of Entry facilitate substantial daily cross-border movement of people and goods between the two cities. The international border and associated port-of-entry infrastructure are important regional planning considerations due to traffic circulation, air quality, infrastructure demand, and economic connectivity.

The Calexico East Port of Entry is located east of downtown Calexico and functions as a major commercial and passenger border crossing facility between the United States and

Mexico. Surrounding land uses include transportation, warehousing, industrial, and commercial uses associated with cross-border trade and logistics activity.

Calexico International Airport

Calexico International Airport is located in the southern portion of the City near the U.S.–Mexico border. The Airport primarily serves general aviation operations and is governed by the Imperial County Airport Land Use Compatibility Plan (ALUCP). As shown in Figure 4.7-2 Calexico International Airport Safety Zones, most of the City and some housing sites are located within Safety Zone 6, Traffic Pattern Zone, and Zone 7, Part 77 Conical Surface, requiring consideration of airport compatibility policies related to safety, noise, height restrictions, and overflight activity.

New River Corridor

The New River intersects the southwestern portion of Calexico and continues northward through Imperial County before flowing into the Salton Sea. Land uses adjacent to the New River corridor include industrial, commercial, transportation, public utility, and residential uses. The River corridor is a major environmental and infrastructure feature within the City and is subject to ongoing improvement and revitalization planning efforts intended to improve water quality, aesthetics, recreation opportunities, and adjacent land use compatibility.

4.9.2 Regulatory Framework

4.9.2.1 State

State Housing Element Law

State Housing Element law requires cities to regularly update their housing elements every eight years to identify and analyze housing needs; establish reasonable goals based on those needs; and set forth a comprehensive list of actions to achieve those goals. In the face of increasing housing costs and the lack of affordable housing throughout the state, the legislature has prioritized the provision of a decent home and suitable living environment to each Californian, with particular focus on housing affordable to low and very low-income households. As a result, state Housing Element law (Government Code Section 65583 et seq.) now requires all incorporated cities and unincorporated counties to regularly update their General Plan Housing Element to ensure each city and county in the state provides its fair share of housing at all economic levels. The proposed project will adopt the City's 6th Cycle Housing Element, subject to the approval of the State Department of Housing and Community Development (HCD).

Senate Bill 375 – Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act (SB 375) supports the State's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Communities Strategy (SCS), as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet the California Air Resources Board's targets. SB 375 establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a region's SCS that meets the targets (see California Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28).

Senate Bill 743 – Environmental Quality

SB 743 (2013) created a process to change the way projects analyze transportation impacts pursuant to CEQA. Environmental review of transportation impacts typically focuses on the delay that vehicles experience at intersections and on roadway segments. That delay was previously measured using a metric known as "level of service," or LOS. Under SB 743, the focus of transportation analysis shifts from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. In response to SB 743, the CEQA Guidelines were amended to provide an alternative to LOS for evaluating transportation impacts. The alternative criteria promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses (Governor's Office of Land Use and Climate and Innovation (formerly Planning and Research) 2014).

4.9.2.2 Regional

Southern California Association of Governments (SCAG)

SCAG is the designated Metropolitan Planning Organization (MPO) for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City of Calexico is within Imperial County, which is one of the many jurisdictions that fall under SCAG. SCAG has developed regional plans to achieve specific regional objectives.

Regional Housing Needs Assessment

Through the Regional Housing Needs Assessment (RHNA) planning process (see Section 3.2 for details of the assessment process), SCAG distributes to the cities and county within its purview, their fair share of the total regional housing needed for each income category. As described in greater detail in Chapter 3.0 and Table 3-1, Calexico Regional Housing Needs Allocation, the City has been assigned a RHNA of 4,868 new units for the 6th Cycle 2021-2029 planning period; with 26.3 percent (1,279 units) allotted to very low income and below, 13.5 percent (655 units) to low income, 12.6 percent (614 units) to moderate income, and 47.7 percent (2,320 units) to above-moderate income categories.

Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (also known as the Connect SoCal Plan) was adopted in April 2024 and presents the land use and transportation vision for the region through the year 2050, providing a long-term investment framework for addressing the region's challenges (SCAG, 2025). The RTP/SCS explicitly lays out goals related to housing, transportation, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RTP/SCS development process involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Imperial County

Imperial County Airport Land Use Compatibility Plan

The Airport Land Use Compatibility Plan (ALUCP), adopted pursuant to the State Aeronautics Act, establishes policies intended to promote the orderly development of airports and surrounding land uses within areas subject to Airport Land Use Commission (ALUC) jurisdiction. The primary purpose of the ALUCP is to protect public health, safety, and welfare by minimizing exposure to excessive aircraft noise, safety hazards, and land use incompatibilities in the vicinity of airports. Appendix B of the ALUCP addresses the Calexico International Airport and identifies Airport Influence Area (AIA) compatibility zones applicable to portions of the City of Calexico. Some housing sites may be located within or near the Airport Influence Area and would therefore be subject to applicable compatibility criteria related to noise, safety, building height, and airspace protection. Future development projects implemented under the Housing Element Update would be reviewed for consistency with the ALUCP and, where applicable, would be subject to review by the

Imperial County Airport Land Use Commission to ensure compatibility with airport operations.

Imperial County Hazard Mitigation Plan

The 2021 Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) identifies the natural and human-caused hazards affecting the region and outlines strategies to reduce risks to public safety, infrastructure, and property. It addresses hazards such as wildfire, flooding, extreme heat, drought, and earthquakes, and includes measures such as emergency preparedness, fuel management, infrastructure improvements, defensible space, and interagency coordination. The MHMP also helps maintain regional eligibility for FEMA hazard mitigation funding.

Calexico is an active participating jurisdiction with its own dedicated sections, hazard assessments, and mitigation strategies outlined in the county-wide document. The MHMP evaluates regional threats such as earthquakes, floods, and hazardous materials incidents specifically affecting Calexico.

The MHMP contains the following goals, objectives, and policies relevant to land use:

- **Objective 7:** Low and medium density single-family residential land uses should be encouraged, in new and in-fill areas, to provide family-oriented housing in a wide range of sizes and costs.
- **Policy 7a:** Single-family residential land uses shall be located in areas adjacent to equivalent densities in in-fill situations.
- **Policy 8a:** Multiple-family residential land uses shall be located in areas where compatible with existing land uses and in close proximity to circulation, transit availability, commercial areas, and provision of public services and facilities.
- **Policy 15c:** The land use pattern should encourage the use of public transportation by City residents and visitors.
- **Policy 16a.** The City should encourage agricultural uses on vacant lands master planned for other land uses, as an interim use.
- **Policy 16d**: Agricultural land should not be annexed into the City until development is eminent. Agricultural uses should cease no later than two years after annexation of the property into the City of Calexico.
- **Objective 21:** The City shall encourage infill and adjacent new development to provide for the efficient use of existing infrastructure, avoid “leapfrog” new development and to reduce impacts to agriculture.

4.9.2.3 Local

2007 Adopted Calexico General Plan

The purpose of the City of Calexico General Plan is to guide growth throughout the City. Under the General Plan, urban development is directed to areas where infrastructure exists or can be provided and where public health and safety hazards are limited. Development should avoid natural, cultural, and economic resources.

The City of Calexico General Plan includes nine adopted elements: Land Use; Circulation; Public Facilities and Services Element; Conservation and Open Space Element; Parks and Recreation Element; Noise Element; Safety Element; and Economic Development Element. Together, these elements satisfy the California Code requirements for general plan elements. Each element includes goals, objectives, and implementing policies and action programs. Relevant elements are outlined below:

Land Use Element

Figure 4.9-1, General Plan Land Use Map, shows the land use designations in the adopted General Plan for the City. The Land Use Element is intended to be the guide to the ultimate pattern of development in the community. It specifies the location, type, and amount of housing, commercial services, industrial uses, parks and public facilities, and open space that would compose the City at buildout. Compatibility between adjacent land uses in the City is of primary importance to achieve a safe, livable and functional community and to ensure a high quality of life. To minimize conflicts, land uses must be located in a pattern that considers generic land use characteristics, limitations and requirements, such as traffic and access, noise, public services, siting and visual appearance, and public safety. The Land Use Element provides goals, objectives, and policies that guide City decision makers in directing future growth and development and regulates the types of land uses and land use intensities within the City (City of Calexico 2007).

6th Cycle Housing Element

The proposed 6th Cycle Housing Element Update provides the City with a coordinated and comprehensive strategy for promoting the production of safe and affordable housing within the community.

Municipal Code

Chapter 17 – Zoning

The City Zoning Ordinance is consistent with the City's General Plan and is the primary implementation tool for the Land Use Element. Zoning regulations for the City are adopted and established to serve the public health, safety, and general welfare and to protect the

physical, social, and economic stability for residential, commercial, industrial, and other land uses in the City to ensure its orderly and beneficial development. The Zoning Ordinance and Map identify specific types of land uses, intensity of uses, and development performance standards applicable to specific areas and parcels of land within the City. The existing zone assigned to each of the proposed rezone sites is listed in Table 3-2, Sites Inventory, and Figure 2-4, Existing Zoning, and the proposed zones are shown on Figure 3-3, Proposed Zoning.

4.9.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts related to land use would be significant if the project would:

1) Threshold 1: Physically divide an established community.
2) Threshold 2: Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.9.4 Methodology

The Housing Element is a policy document that guides the development of residential units within the City throughout the 6th Cycle RHNA. The land use analysis in this section evaluates the potential for the project to physically divide a community or to cause an inconsistency with applicable plans and policies which could result in environmental impacts. The land use analysis below provides a brief overview of the most relevant policies and development standards from the various planning documents. The analysis relies upon land use and technical data developed by the City, and secondary source information including the adopted General Plan, Municipal Code regulations, as well as data from SCAG and the U.S. Census Bureau.

4.9.5 Issue 1: Physically Divide an Established Community

Would the project physically divide an established community?

4.9.5.1 Impact Analysis

The physical division of an established community typically refers to the construction of a linear feature, such as a new interstate, highway, roadway, railroad tracks, or proposes the construction of any physical feature that would impede the connectivity between parts of a cohesive neighborhood or community. The proposed project does not propose the construction of a linear feature that would impact mobility within the existing community and surrounding area that could physically separate or isolate portions of the community.

The housing sites identified in the Housing Element are located within the City's existing established communities and are currently served by existing roadway networks, utilities,

and municipal infrastructure. While future development could increase residential density and population in certain areas of the City, such development would occur within the context of the existing urban environment and would not disrupt established access, circulation patterns, or community cohesion. Therefore, the proposed project would not introduce land uses or physical features that would divide existing neighborhoods or communities.

4.9.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.9.5.3 Significance After Mitigation

None of the housing sites would require any new major infrastructure or improvements that could physically divide an established community. Therefore, the project would not physically divide an established community, and impacts would be **less than significant**. No mitigation is required.

4.9.6 Issue 2: Conflicts with Plans and Policies

Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact?

4.9.6.1 Impact Analysis

Under CEQA, conflicts with applicable plans, policies, or regulations are not considered significant environmental impacts in and of themselves. A policy inconsistency may constitute a significant impact only where the policy was adopted for the purpose of avoiding or mitigating an environmental effect and the inconsistency would result in a significant adverse physical change in the environment based on the significance criteria established for the resource area being analyzed.

The proposed rezones were strategically planned within the City's established urban development framework, surrounded by compatible land uses, supporting infill development patterns consistent with the City of Calexico General Plan Land Use Element, SCAG regional planning objectives, and state housing policies. Although future development projects could result in localized environmental impacts associated with site-specific construction and redevelopment activities, such impacts would be evaluated through subsequent environmental review processes and subject to applicable mitigation and regulatory compliance requirements. As described in Table 4.10-1, Project Consistency with Land Use Plans and Policies, adoption and development under the proposed project would not conflict with applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect. Relevant and applicable planning documents pertaining

to the other environmental resource topics are discussed in their respective sections of this DEIR; see sections 4.2 Air Quality; 4.3 Biological Resources; 4.6, Greenhouse Gas Emissions; 4.7 Hazards and Hazardous Materials; 4.8 Hydrology and Water Quality; 4.10 Noise, 4.12, Public Services and Recreation; and 4.13 Transportation.

Table 4.9-1 Project Consistency with Land Use Plans and Policies, summarizes applicable land use plans, policies, and regulations relevant to the project and demonstrates the project's overall consistency with those requirements.

Table 4.9-1 Project Consistency with Land Use Plans and Policies

Land Use Policies	Project Consistency
State Regulations, Plans, and Policies	
State Housing Element Law (California Government Code Section 65583 et seq.): Cities are required to update their Housing Elements every eight years. Cities are also required to demonstrate in their Housing Element that the land inventory is adequately zoned to accommodate that jurisdiction's share of the regional growth.	The Housing Element Update identifies adequate residential sites and includes proposed rezoning actions intended to accommodate the City's RHNA allocation for the 2021–2029 planning period. The proposed rezones would increase residential development capacity and support compliance with State Housing Element Law. Implementation of future development projects would remain subject to site-specific review and applicable development standards. As such, the proposed project is consistent with this regulation.
Regional Regulations, Plans, and Policies	
SCAG 2024-2050 Connect SoCal RTP/SCS Goals: The RTP/SCS supports the development of resilient and thriving communities while promoting a healthy region for current and future generations. By balancing agricultural conservation with strategic growth, the Plan will help foster a sustainable, efficient, and productive regional economy that creates opportunities for residents and supports long-term community well-being. Specific goals are included below:	
Goal 1: Support investments that are well-maintained and operated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	The Housing Element Update facilitates residential development within existing urbanized areas of Calexico that are generally served by existing infrastructure, public facilities, and transportation networks. By promoting infill development and efficient use of and access to existing infrastructure and land uses, the proposed project supports regional efforts to improve air quality, reduce vehicle

Land Use Policies	Project Consistency
	travel, and minimize greenhouse gas emissions associated with dispersed development patterns. As such, the proposed project is consistent with this goal.
Goal 3: Support planning for people of all ages and backgrounds.	The Housing Element Update identifies adequate sites and implements programs intended to accommodate the City's RHNA allocation across all income categories. The project supports the provision of housing opportunities across a range of housing types for a diverse population, including lower-income households, seniors, families, and individuals with special housing needs. Therefore, the proposed project is consistent with this goal.
Goal 4: Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	The rezones associated with the Housing Element Update, focus on sites located within the City's existing developed area, many of which are located near employment centers, commercial services, schools, and transportation corridors. Concentrating future housing opportunities in these areas supports walkability, multimodal transportation options, and reduced travel distances for residents. Therefore, the proposed project is consistent with this goal.
Goal 5: Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	The primary purpose of the Housing Element Update is to increase residential development capacity and facilitate housing production across a range of income levels. The project supports a variety of housing types and densities to address existing and future housing needs while improving housing affordability and accessibility within the City. Therefore, the proposed project is consistent with this goal.
Goal 6: Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	The Housing Element Update promotes development patterns that support efficient infrastructure use, reduced vehicle travel, and implementation of State and local sustainability initiatives. Future development

Land Use Policies	Project Consistency
	facilitated by the project would be subject to applicable building codes, environmental regulations, and General Plan policies intended to promote long-term community resilience and climate adaptation. As such, the proposed project is consistent with this goal.
Goal 7: Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	The project supports coordinated land use and transportation planning by directing future housing opportunities to areas served by existing transportation infrastructure and public services. The project's approach is consistent with regional objectives to improve mobility, reduce greenhouse gas emissions, and encourage efficient use of energy and water resources.
Goal 8: Conserve the region's resources.	The Housing Element primarily accommodates future growth through infill development and redevelopment of vacant and underutilized sites within the City's existing urban footprint. By directing growth to already developed areas, the project promotes efficient land use and helps conserve regional resources, including agricultural land, open space, infrastructure capacity, water resources, and energy resources. Therefore, the proposed project is consistent with this goal.
Other Regional Regulation, Plans, and Policies	
2026 Imperial County Airport Land Use Compatibility Plan (ALUCP): **The ALUCP establishes land use compatibility criteria intended to minimize hazards to aircraft operations and protect public health and safety within the Airport Influence Area (AIA) of the Calexico International Airport. The ALUCP evaluates compatibility related to noise exposure, safety zones, overflight activity, building height restrictions, and hazards to air navigation. Residential development within airport influence areas must be reviewed for**	Some housing sites may be located within or near one of the seven safety zones for the Calexico International Airport. However, the Housing Element itself does not approve specific development projects or authorize construction inconsistent with airport land use compatibility requirements. Future development projects within the safety zones would be subject to project-level review for consistency with the Imperial County ALUCP, FAA review and determination, and per **MM HAZ-1** recordation of an avigation easement and project design requirements. Compliance

Land Use Policies	Project Consistency
consistency with applicable compatibility zone criteria and Federal Aviation Administration (FAA) requirements	with these requirements would reduce safety hazards, however, would not avoid a conflict with the ALUCP. Therefore, the proposed project is inconsistent with this goal.
Local Regulations, Plans, and Policies	
2007 General Plan Land Use Element[1]: The Land Use Element provides goals, objectives, and policies that guide City decision makers in directing future growth and development and regulates the types of land uses and land use intensities within the City. Specific policies are included below:	
Policy 1(a): Encourage compact urban development patterns and efficient use of land resources.	The proposed rezoning program identified in the Housing Element Update focuses primarily on vacant and underutilized parcels located within developed portions of the City, consistent with this policy encouraging compact urban development and efficient land utilization.
Policy 1(b): Encourage infill development within existing developed areas where public facilities and infrastructure are available.	Housing sites identified in the Housing Element are generally located within areas served by existing public infrastructure and municipal services, consistent with this City infill development policy.
Policy 1(c): Promote development patterns that reduce dependence on automobiles and encourage alternative transportation opportunities.	Several housing sites are located near transportation corridors, commercial uses, and community services, which would support walkability and alternative transportation opportunities consistent with this policy.
Policy 2(a): Where land uses may result in conflicting activities, traffic, noise levels, or visual character, adequate buffering and/or setbacks shall be required.	Future residential and mixed-use development projects would be subject to City development standards and design review requirements intended to minimize land use incompatibilities and potential environmental conflicts. Therefore, the proposed project is consistent with this goal.
Policy 2(b): The Land Use Compatibility Matrix (Table LU-G) shall be used to determine general levels of compatibility.	Future development facilitated by the project would be reviewed for consistency with applicable land use compatibility standards and zoning requirements to ensure compatibility between adjacent uses.

[1] The proposed project includes General Plan Amendments to the Land Use Element to remain consistent with the 6th Cycle Housing Element, such as land use map edits.

Land Use Policies	Project Consistency
Policy 2(c): In cases where compatibility between land uses is uncertain, the lower intensity use shall take precedence.	The preparation of the Housing Element included strategic evaluation of site placement to ensure compatibility with surrounding land uses. The Housing Element itself does not approve specific development projects; future projects would undergo site-specific review to evaluate compatibility with surrounding uses and compliance with General Plan policies. As such, the proposed project is consistent with this goal.
Policy 3(a): The number of dwelling units in the City shall be limited to those which can be adequately served by public services and facilities.	The preparation of the Housing Element included strategic evaluation of site placement to consider infrastructure access and availability. Development facilitated by the Housing Element would remain subject to City review for adequate public services, utilities, and infrastructure capacity prior to project approval. As such, the proposed project is consistent with this goal.
Policy 3(b): Urban development shall be directed to areas where public facilities and infrastructure are available or can be economically extended.	The proposed housing sites are generally located within the City's existing urbanized area where infrastructure and public services are currently available or planned for extension. As such, the proposed project is consistent with this goal.
Implementation Policy: The Zoning Ordinance and Official Zoning Map shall remain consistent with the General Plan Land Use Map.	The proposed rezoning program and associated General Plan Amendments would maintain consistent between planned land uses and zoning classifications for housing sites identified in the Housing Element.
Other Local Regulations, Plans, and Policies	
City of Calexico Urban Water Management Plan: Plans for long-term water supply reliability to serve existing and future development.	Future residential development facilitated by the Housing Element would occur incrementally and would be subject to verification of adequate water service and infrastructure capacity during subsequent project-level review. The Housing Element itself does not directly increase water demand beyond planned growth assumptions. See Appendix H, Water Supply Assessment for

Land Use Policies	Project Consistency
	further analysis on long-term water supply reliability to serve the proposed project. The proposed project is consistent with this goal.
Municipal Code Zoning Ordinance: The Zoning Ordinance implements the City's General Plan by establishing site specific development use regulations and development standards.	The proposed rezoning program and would amend the Zoning Ordinance to establish zoning classifications consistent with Housing Element goals and planned residential land uses. Future development would continue to be subject to applicable zoning regulations and development standards. As such, the proposed project is consistent with this goal.

The proposed project would update the City's Housing Element according to State law, and update other Elements of the General Plan for internal consistency. The Calexico Zoning Ordinance will be updated to reflect the Housing Element policies. However, the project would result in a conflict with the applicable ALUCP due to potential development within the Safety Zones that would exceed the density levels cited in the ALUCP. Therefore, the project would potentially cause a significant environmental impact related to safety hazards due to the conflict with the ALUCP.

4.9.6.2 Mitigation Framework

Implementation of **MM HAZ-1** (see Section 4.7.9.1) would reduce the project's potential exposure to aircraft safety hazards and/or would ensure appropriate coordination with the applicable airport land use authority. However, **MM HAZ-1** would not entirely eliminate the proposed project's potential risks associated with the underlying inconsistency with the ALUCP.

4.9.6.3 Significance After Mitigation

Implementation of **MM HAZ-1** would reduce, but would not fully eliminate, the potential environmental effects associated with the project's inconsistency with the applicable ALUCP. Because the proposed project would remain inconsistent with applicable ALUCP compatibility criteria after implementation of the mitigation measure, the impact would remain **significant and unavoidable**.

4.10 Noise

This section analyzes potential noise impacts that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker Site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). This section addresses potential noise impacts related to compliance with applicable noise ordinance standards, generation of groundborne noise and vibration ordinance standards, temporary and permanent increases in ambient noise levels, and airport noise. Noise modeling data are contained in Appendix H, Noise Analysis for the City of Calexico Housing Element Update, of this Draft Program Environmental Impact Report (DEIR). Impacts are assessed in accordance with standards established in the City's General Plan Noise Element and the City's Municipal Code.

4.10.1 Existing Conditions

The City is subjected to variable levels of noise in terms of intensity and duration. The major sources of noise include traffic, particularly on SR-98/Birch Street and State Route 111 (SR-111)/Imperial Avenue, freight trains aircraft from Calexico International Airport, agricultural noise, commercial/industrial noise, and community activities. For the purpose of this discussion, noise levels refer to the combination of the ambient (background) noise and local noise sources.

4.10.1.1 Measured Noise Levels

As further defined in Appendix H, existing noise levels within the City were measured on May 6, 2026, using one Larson-Davis Model LxT, Type 1 Integrating Sound Level Meter, serial number 3897. The following parameters were used:

Filter:	A-weighted
Response:	Slow
Interval Period	1 minute
Time History Period:	5 seconds

The meter was calibrated before measurements. The meter was set five feet above the ground level for each measurement. The weather was warm and sunny with a slight breeze during the measurement period. The noise meter was brought to the ,measurement locations shown in Figure 4.10-1 Noise Measurement Locations. These noise measurement

locations captured the general vicinity of clusters of housing sites, nearest to intersections or other noise sources. Based on these measurements, daytime noise levels in the project area range from approximately 44 to 68 dB(A) L_{eq}.

Image Source: NearMap (flown September 2025)

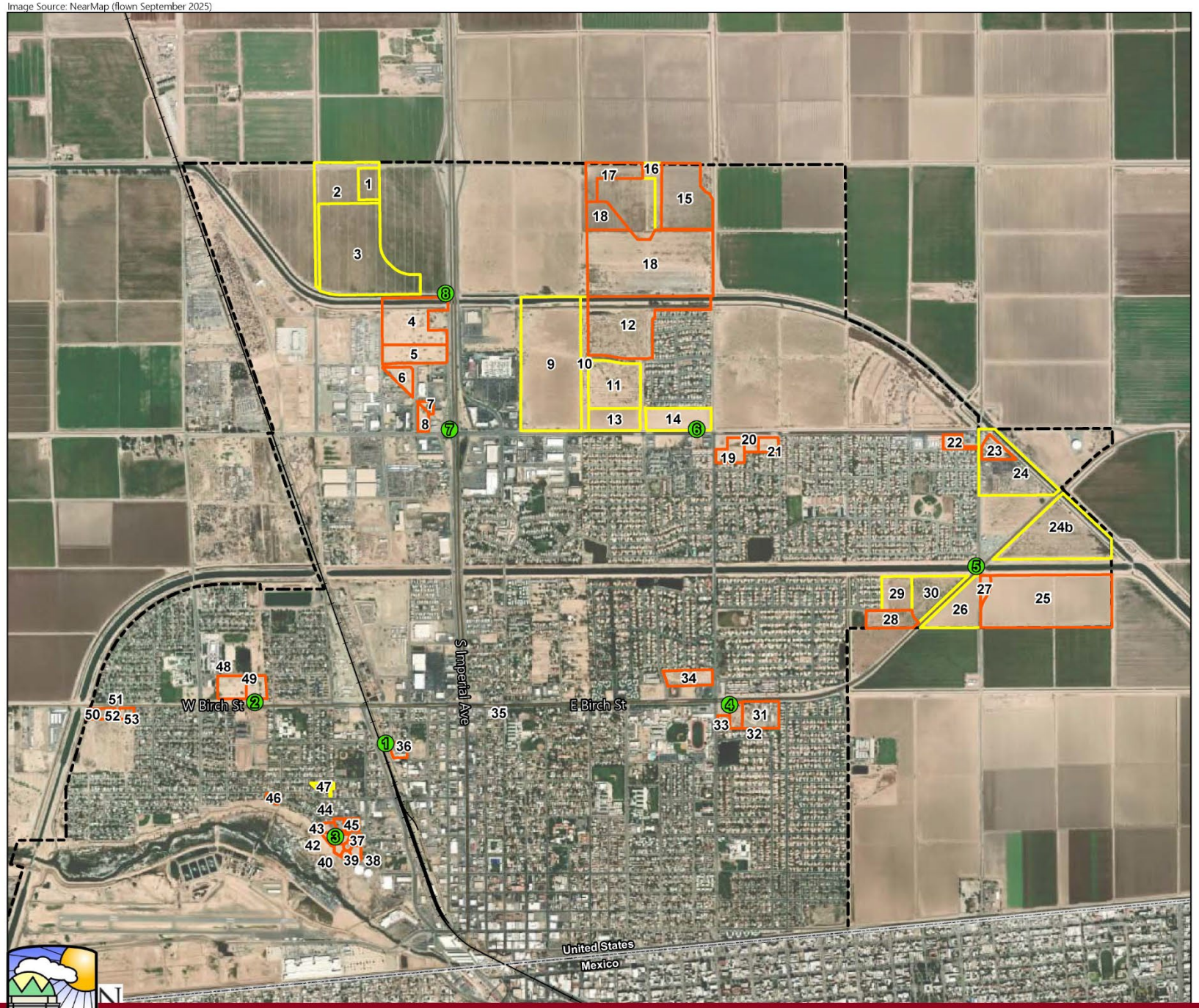


Figure 4.10-1:
Noise Measurement Locations

4.10.1.1 Vehicle Traffic Noise

Major roads generating the greatest noise levels in the City are SR-98/Birch Street and SR-111/Imperial Avenue. SR-111/Imperial Avenue also carries significant traffic at the U.S./Mexico international border crossing at the City's southern boundary. Additionally, numerous other roads within the City are also major sources of noise. Generally, higher noise levels result from higher traffic volumes and higher traffic speeds. The mix of vehicles using the roadway also affects noise levels. For example, a truck route would have higher noise levels compared to another street where truck traffic was prohibited. Figures 4.10-2a, Existing Vehicle Traffic Noise Contours – AM Peak Hour Traffic, and 4.10-2b, Existing Vehicle Traffic Noise Contours – PM Peak Hour Traffic, show the existing vehicle traffic noise contours for the City. The noise contour distances represent the predicted noise level for each roadway without the attenuating effects of noise barriers, structures, topography, or dense vegetation. As intervening structures, topography, and dense vegetation would affect noise exposure at a particular location, the noise contours should not be considered site-specific but are rather guides to determine when detailed acoustic analysis should be undertaken.

4.10.1.2 Railroad Noise

The Southern Pacific Railroad Company operates freight trains on the railroad tracks that travel north-south in the western portion of the City from the U.S./Mexico international border, parallel to Cesar Chavez Boulevard and the western City boundary. The railroad is significant in its contribution to the nuisance noise level. It is also an important part of the industrial, commercial and agricultural economic base of the community. Based on U.S. Department of Transportation (DOT) Federal Railroad Administration crossing inventories for at-grade crossings within the City, typically one freight train travels at 10 miles per hour (mph) through the City each day. The train typically operates in the morning hours around 6 a.m. Railroad noise contours based on this train activity are shown in Figure 4.10-3: Railroad Noise Contours.

4.10.1.3 Aircraft Noise

The Calexico International Airport is located in the western portion of the City on Anza Road, adjacent to the U.S./Mexico international border. The airport encompasses approximately 284 acres and consists of a single runway. The airport is used mostly for general aviation and to facilitate border crossing. Aircraft noise generally affects areas within the airport vicinity during takeoffs and landings, and areas located around the flight tracks. Airport noise contours, which are based on year 2044 flight projections, are shown in Figure 4.10-4: Calexico International Airport Noise Contours.

Image Source: NearMap (flown September 2025)

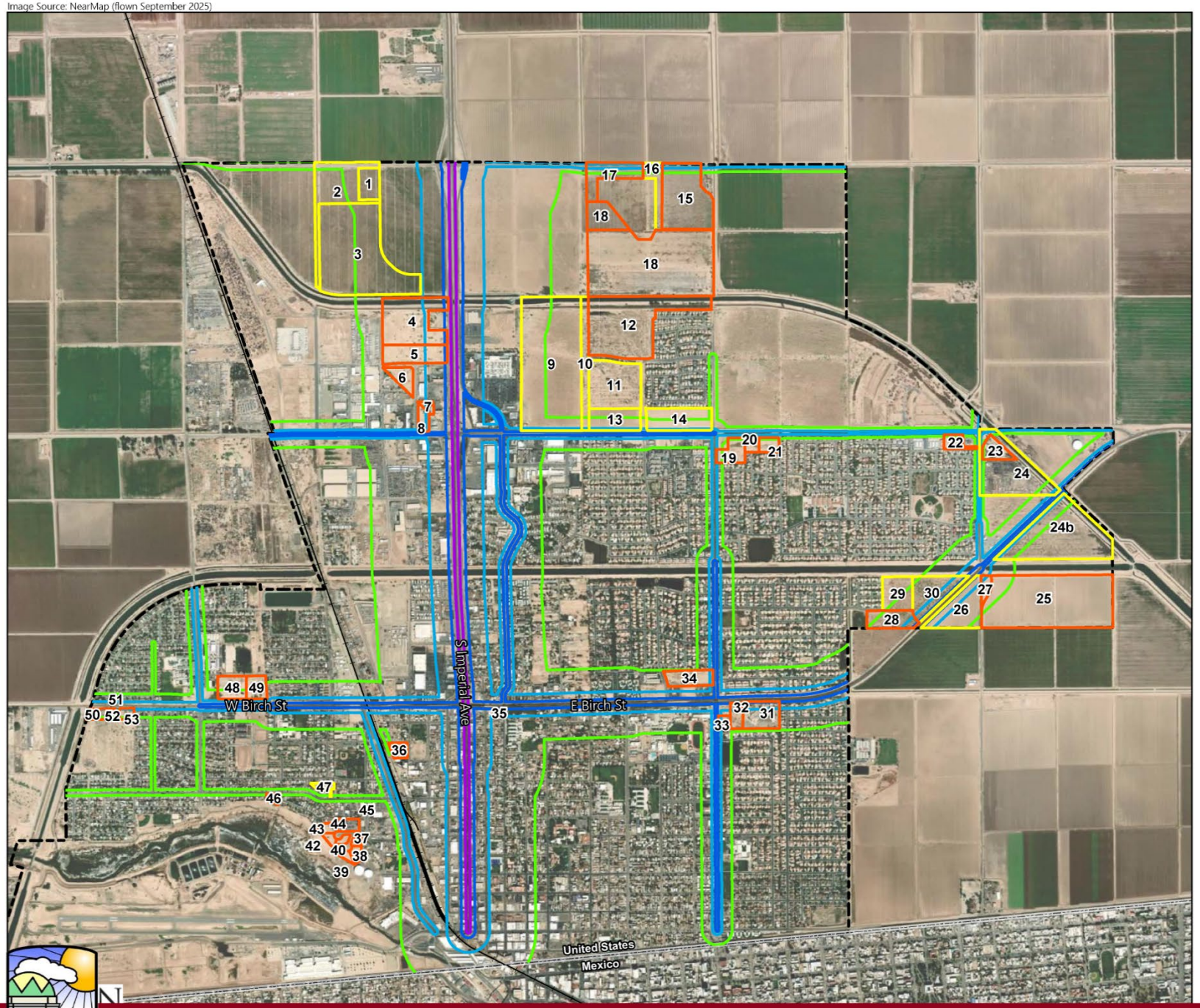


Figure 4.10-2a:

Existing Vehicle Traffic Noise Contours - AM Peak Hour Traffic

Image Source: NearMap (flown September 2025)

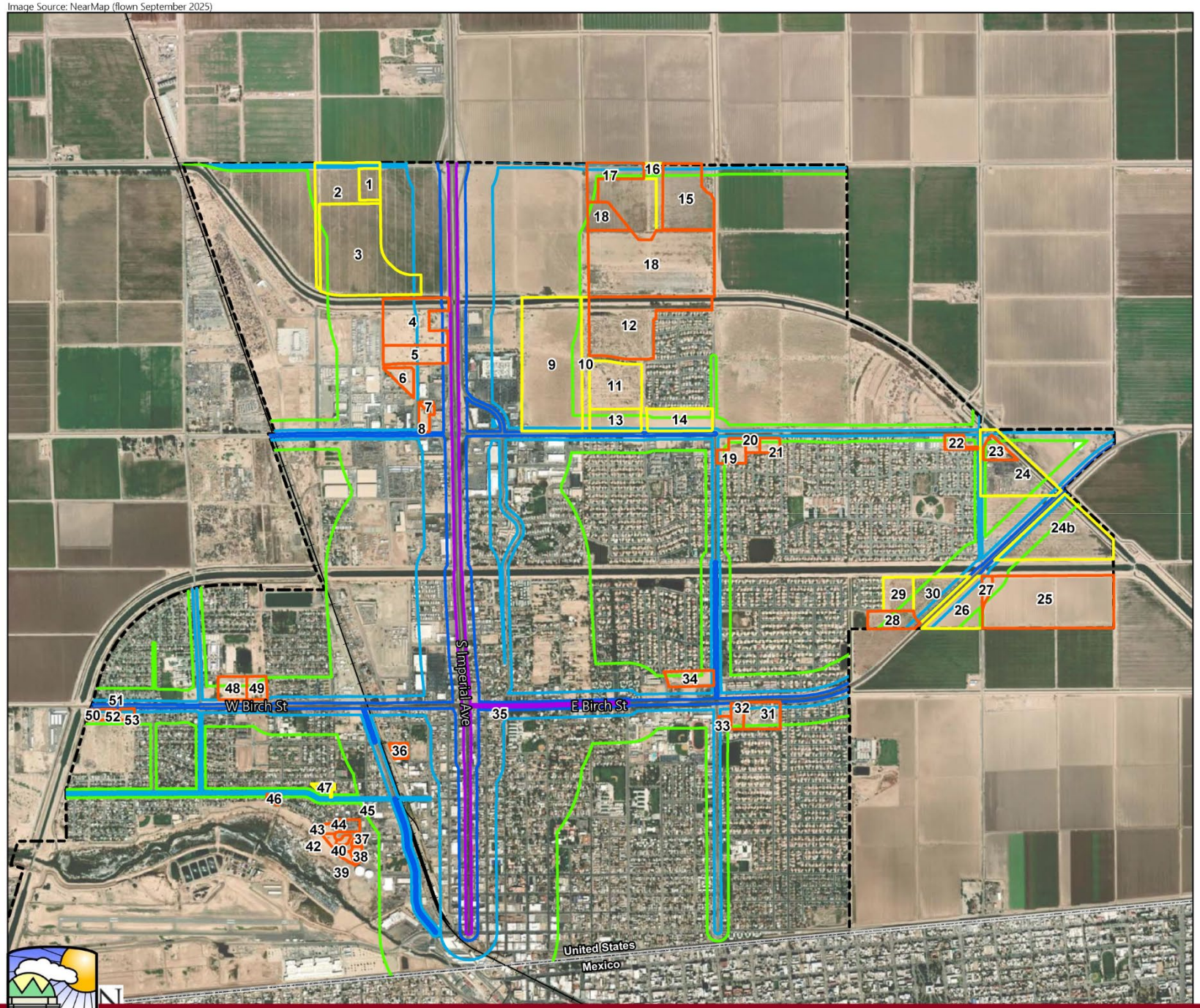


Figure 4.10-2b:

Existing Vehicle Traffic Noise Contours -PM Peak Hour Traffic

Image Source: NearMap (flown September 2025)

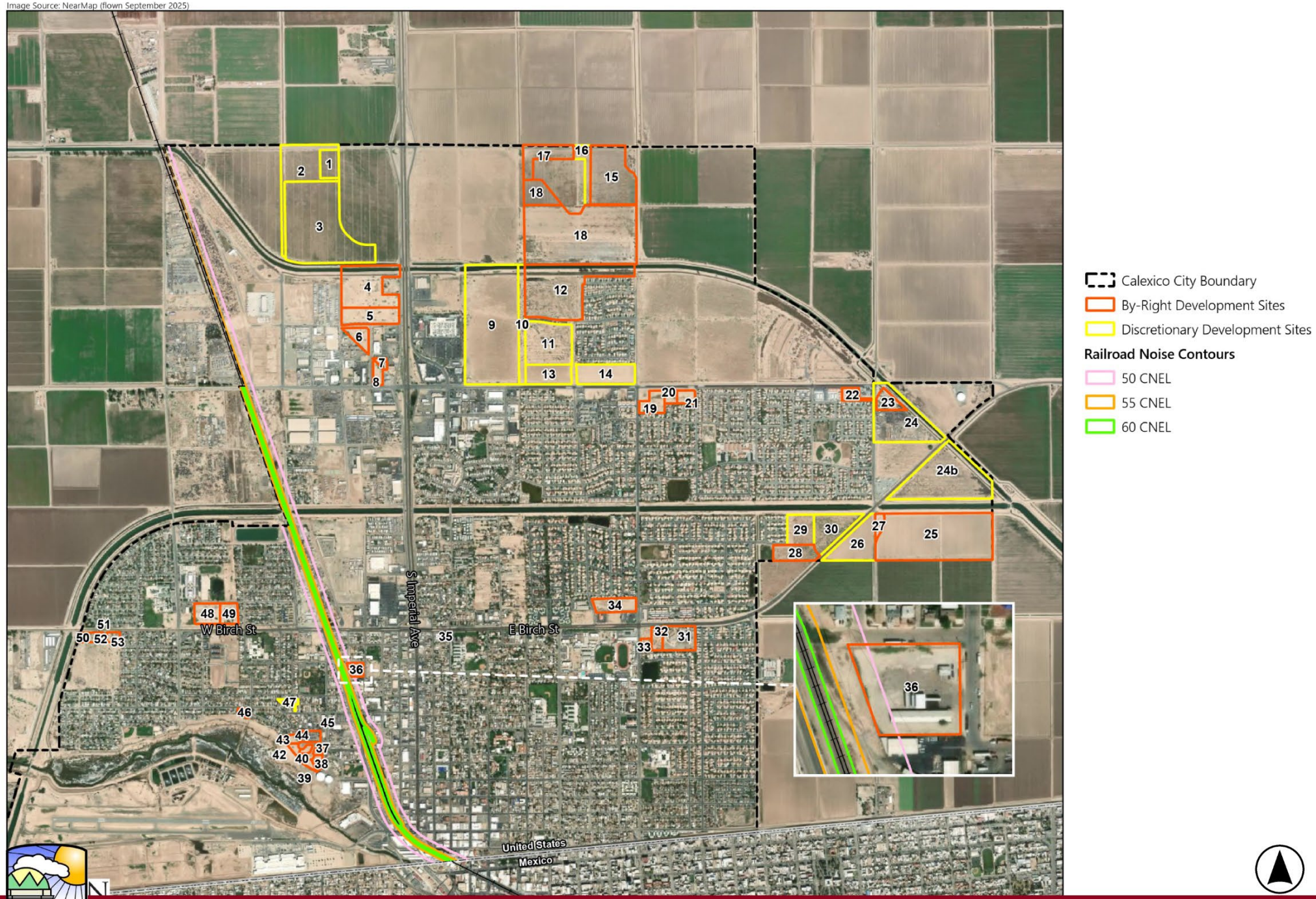
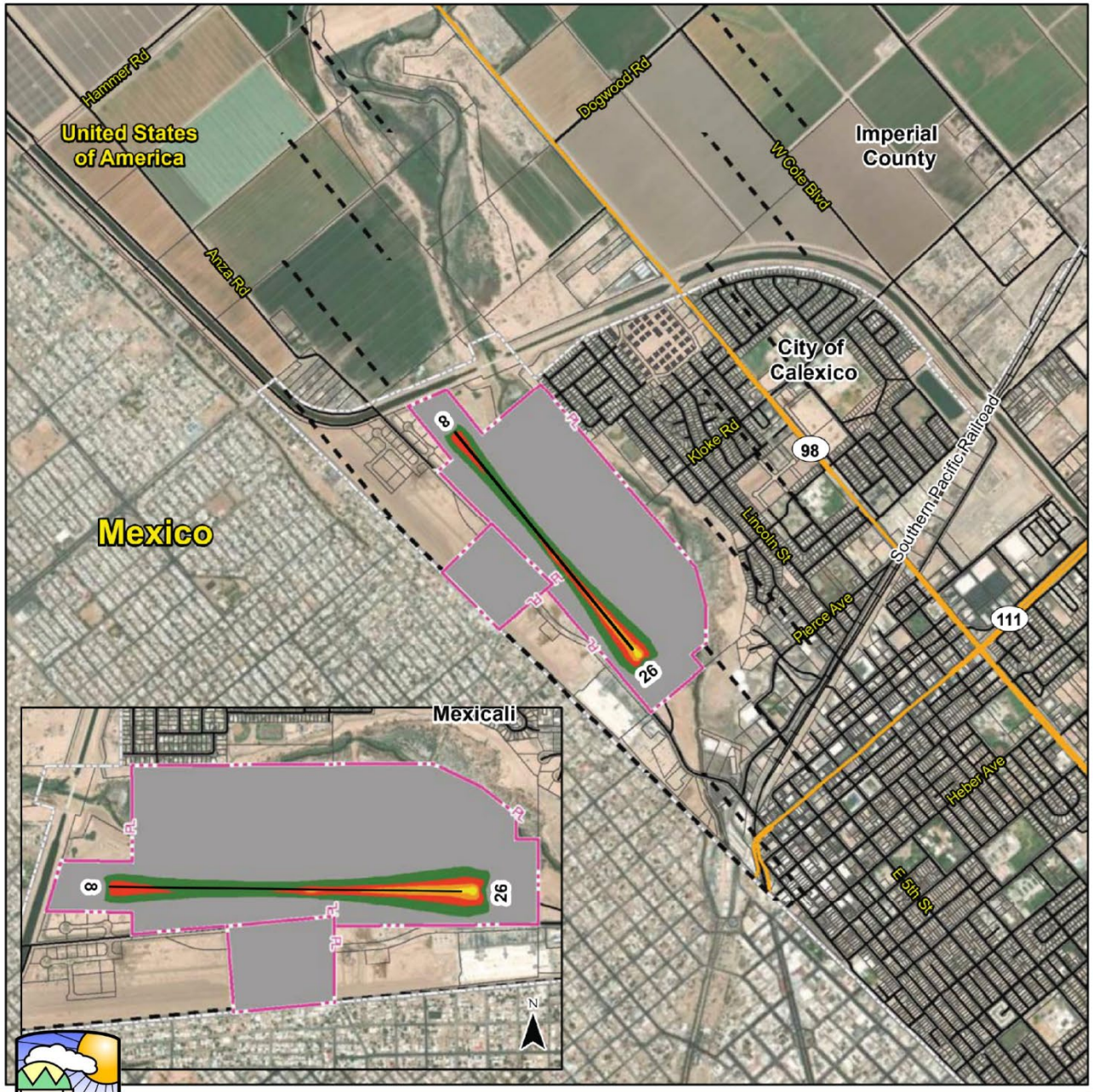


Figure 4.10-3:
Railroad Noise Contours



Existing and Ultimate Runway[1]
Airport Property Boundary[2]
Mexico-United States Border
Municipal Boundaries
Highway
Railroad
Streets
Parcels

2044 Noise Contour

60 CNEL
65 CNEL
70 CNEL
75 CNEL

CNEL: Community Noise Equivalent Level

[1]ADIP
[2]Airport Layout Plan (2015)

Sources: Imperial County Parcels, Imperial County Streets, Airport Layout Plan (2023), ESRI Basemap Imagery (2023).

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Figure 4.10-4

Calexico International Airport Noise Contours

4.10.1.4 Other Sources of Noise

Other sources of noise within the City include equipment and activities associated with agricultural, industrial, and commercial land uses. Agricultural uses include the use of heavy equipment used for planting, harvesting, and other farming needs. Stationary noise sources are the noise sources in the community such as industrial and mechanical equipment, which are often referred to as "fixed sources." Industrial noise generated by processing and operation is usually of long duration at relatively low frequencies. Industrial uses, including manufacturing, warehousing, and distribution-related uses, are another source of noise that can have a varying degree of impact on adjacent uses. Mechanical equipment, generators, and vehicles associated with these uses all contribute to noise levels at industrial sites. Construction sources generate high noise levels for temporary, but sometimes extended, periods of time from operation of heavy equipment. Other land uses such as commercial development may result in general nuisance noise exposure from high amounts of activity, maintenance activities, and mechanical noise.

4.10.2 Regulatory Framework

4.10.2.1 Federal

Federal Transit Administration (FTA)

The FTA Transit Noise and Vibration Impact Assessment Manual (FTA 2018) recommends a daytime construction noise level threshold of 80 dB(A) $L_{eq(8)}$ when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this guidance is not a regulation, it can serve as a quantified standard in absence of such limits at the state and local jurisdiction levels.

The FTA provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively.

The FTA also provides guidance for assessing vibration impacts from railroad operations. The criteria for determining the significance of impacts are presented in Table 4.10-1: FTA Vibration and Noise Guidelines.

Table 4.10-1: FTA Vibration and Noise Guidelines

Land Use Category	Groundborne Vibration Impact Levels (VdB re 1 micro-inch per second)			Groundborne Noise Impact Levels (dB re 20 micro Pascals)		
	Frequent Events	Occasional Events	Infrequent Events	Frequent Events	Occasional Events	Infrequent Events
Category 1: Buildings where low ambient vibration is essential for interior operations (research & manufacturing facilities with special vibration constraints)	65 VdB	65 VdB	65 VdB	N/A	N/A	N/A
Category 2: Residences and buildings where people normally sleep (hotels, hospitals, residences, & other sleeping facilities)	72 VdB	75 VdB	80 VdB	35 dB(A)	38 dB(A)	43 dB(A)
Category 3: Institutional land uses with primarily daytime use (schools, churches, libraries, other institutions, & quiet offices)	75 VdB	78 VdB	83 VdB	40 dB(A)	43 dB(A)	48 dB(A)

SOURCE: FTA 2018.
VdB = vibration decibel; re = relative; N/A = not applicable
"Frequent Events" is defined as more than 70 vibration events per day. Most rapid transit projects fall into this category.
"Occasional Events" is defined as 30 to 70 vibration events per day. Most commuter trunk links fall into this category

"Infrequent Events" is defined as fewer than 30 vibration events per day. This category includes most commuter rail systems.

For Category 1 uses such as vibration sensitive equipment, the screening distance from the right-of-way is 600 feet. For Category 2 land uses such as residences and buildings where

people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses such as institutional land uses with primarily daytime uses is 120 feet.

Federal Highway Administration (FHWA)

The Federal Highway Administration (FHWA) regulates traffic noise associated with federally funded highway projects through 23 Code of Federal Regulations (CFR) Part 772, Procedures for Abatement of Highway Traffic Noise and Construction Noise. These regulations establish requirements for traffic noise studies, define noise impact criteria, and require evaluation of feasible and reasonable noise abatement measures where traffic noise impacts are identified. Potential mitigation measures may include sound walls, traffic management strategies, alignment modifications, or other design features intended to reduce noise exposure. FHWA regulations are intended to protect public health and welfare while providing guidance for incorporating noise considerations into the planning and design of transportation projects.

U.S. Department of Housing and Urban Development

Federal noise standards established by the U.S. Department of Housing and Urban Development (HUD) are applicable to residential projects that receive HUD assistance. These standards are presented in 24 Code of Federal Regulations (CFR) Part 51. New construction proposed in high noise areas (exceeding 65 dBA Ldn) must incorporate noise attenuation features to maintain acceptable interior noise levels. A goal of 45 dBA Ldn is set forth for interior noise levels and attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction, any building will provide sufficient attenuation to achieve an interior level of 45 dBA Ldn or less if the exterior level is 65 dBA Ldn or less. Approvals in a "normally unacceptable noise zone" (exceeding 65 dBA, but not exceeding 75 dBA) require a minimum of 5 dBA of additional noise attenuation for buildings having noise sensitive uses (e.g., residences) if the day-night average is greater than 65 dBA, but does not exceed 70 dBA, or a minimum of 10 dBA of additional noise attenuation if the day-night average is greater than 70 dBA, but does not exceed 75 dBA.

4.10.2.2 State

California Code of Regulations

For residential uses, interior noise levels for habitable rooms are regulated also by Title 24 of the California Code of Regulations, California Noise Insulation Standards. Title 24, Chapter 12, Section 1206.4 of the 2025 California Building Code requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room within a residential structure. A habitable room is a room used for living, sleeping, eating, or cooking.

Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

For non-residential structures, Title 24, Chapter 12, Section 1207.5 refers to 2025 California Green Building Standards, Chapter 5 – Nonresidential Mandatory Measures, Division 5.5 – Environmental Quality, Section 5.507 – Environmental Comfort, Subsection 5.507.4 – Acoustical Control. Pursuant to these standards, all non-residential building construction shall employ building assemblies and components that achieve a composite sound transmission class rating of at least 50 or shall otherwise demonstrate that exterior noise shall not result in an interior noise environment where noise levels exceed 50 dB(A) L_{eq} in occupied areas during any hour of operation.

California Green Building Standards Code 2019 (CALGreen) Section 5.507.4, Acoustical Control, regulates construction of non-residential uses within the 65 dBA CNEL/Ldn contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1-2 "buildings exposed to a noise level of 65 dBA Leq(1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method or performance method".

Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source meet a composite sound transmission class rating of at least 50 or a composite outdoor/indoor transmission class rating of no less than 40, with exterior windows of a minimum sound transmission class of 40 or outdoor/indoor transmission class of 30. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source are constructed to provide an interior noise environment that does not exceed 50 dBA Leq(1-hr) in occupied areas during hours of operations.

4.10.2.3 Regional

Imperial County Airport Land Use Commission

The Calexico International Airport is located in the southwest portion of the City. The Imperial County Airport Land Use Commission (ALUC) prepares the airport land use compatibility plan (ALUCP) for the six public-use airports in Imperial County, including the Calexico International Airport and Naval Air Facility El Centro. The ALUCP sets compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances. The Imperial County ALUCP was adopted on February 18, 2026, and provides noise level contours and noise compatibility criteria for various land uses (Imperial County ALUC 2026). The relevant noise compatibility criteria are shown in Table 4.10-2: Imperial County ALUCP Noise Compatibility Criteria Matrix.

Table 4.10-2: Imperial County ALUCP Noise Compatibility Criteria Matrix

Land Use Category	Exterior Noise Exposure (CNEL)			
	60-64	65-69	70-74	75+
Residential				
Single units – detached	C[1]	N	N	N
Single units – semi-detached	C[1]	N	N	N
Single units – attached row	C[1]	N	N	N
Two units	C[1]	N	N	N
Multi-family, three or more units (rental and ownership)	C[1]	N	N	N
Group quarters (including retirement homes, assisted living, nursing homes, college dormitories, military barracks, correctional residential facilities, extended stay hotels*)	C[1]	N	N	N
Mobile home park or courts	C[1]	N	N	N
Industrial				
Manufacturing	Y	Y	Y	Y
Printing, publishing, and allied industries	Y	Y	Y	Y
Chemicals and allied products manufacturing	Y	Y	Y	Y
Miscellaneous manufacturing	Y	Y	Y	Y
Highway and street right-of-way and other transportation, communication, and utilities	Y	Y	Y	Y
Automobile parking car dealerships, car washes, indoor/outdoor storage facilities, gas stations, truck stops, and transportation terminals	Y	Y	Y	Y

Land Use Category	Exterior Noise Exposure (CNEL)			
	60-64	65-69	70-74	75+
Processing of food, wood, and paper products; printing and publishing; warehouses, wholesale and storage activities	Y	Y	Y	Y
Refining, manufacturing and storage of chemicals, petroleum and related products, manufacturing and assembly of electronic components, etc.	Y	Y	Y	Y
Salvage yards, solid waste facilities, natural resource extraction and processing, agricultural, mills and gins	Y	Y	Y	Y

SOURCE: Imperial County ALUC 2026.
NOTES:
CNEL – Community Noise Equivalent Level, in A-weighted decibels.
Y (Yes) – Land use and related structures compatible without restrictions.
C (Conditionally compatible) – Land use and related structures are permitted, provided that sound insulation is provided to reduce interior noise levels from exterior sources to 45 CNEL or lower.
N (No) – Land use and related structures are not compatible.
[1]Residential buildings must be sound insulated to achieve an indoor noise level of 45 CNEL or less from exterior sources (See Policy 3.2.5).
[2]Accessory dwelling units are not compatible.
Land uses not specifically listed shall be evaluated, as determined by the ALUC, using the criteria for similar uses.
*Lodging intended for stays by an individual person of no more than 25 days consecutively and no more than 90 days total per year; facilities for longer stays are in the extended-stay hotel category
**Airport Rescue and Fire Fighting (ARFF) facilities are exempt from this requirement per FAA regulations.

4.10.2.4 Local

City of Calexico General Plan

The City's General Plan was adopted in February 2007 (City of Calexico 2007). The Noise Element of the General Plan contains goals, objectives, and policies that set standards for evaluating community noise in the City. These Noise Element standards are summarized below.

- **7.8.1 Goal:** Maintain the quiet rural residential nature of the community through the use of sensitive land use practices and appropriate noise mitigation measures.
- **7.8.1.1 Acceptable Noise Levels Objective 1:** The City should establish adverse noise levels for various noise-sensitive uses.

- **Policy 1a:** 65 dBA CNEL is established as the acceptable outdoor noise exposure level for all private residential areas such as backyards.
- **Policy 1b:** Indoor noise levels shall not exceed 45 dBA CNEL for single- and multiple-family dwellings, dormitories, hospitals, nursing homes, apartments, and hotel and motel rooms.
- **Policy 1c:** 70 dBA CNEL is established as the acceptable outdoor noise exposure level for schools (public and private), libraries, churches, hospitals, nursing homes, parks, and recreation areas.
- **Policy 1d:** 70 dBA CNEL is established as the acceptable outdoor noise exposure level for office buildings, business, commercial, professional, and mixed-use developments.
- **Policy 1e:** 75 dBA CNEL is established as the acceptable outdoor noise exposure level for golf courses, riding stables, water recreation, cemeteries, industrial, manufacturing, utilities, and agriculture.
- **7.8.1.2 Land Use Compatibility Objective 2:** Land use distribution should account for the noise characteristics of basic uses.
- **Policy 2a:** The location and distribution of land uses throughout the City should take into account the compatibility of the different uses and their respective noise levels.
- **Policy 2b:** The review of development applications shall consider the impact of the use on the noise environment of existing or planned contiguous uses.
- **Policy 2c:** Where necessary because of incompatibilities, noise attenuation measures shall be required by the City to achieve the acceptable noise exposure levels.
- **7.8.1.3 Circulation Compatibility Objective 3:** Noise levels generated by arterial and larger classification roadways should be considered when planning improvements to the circulation system.
- **Policy 3a:** The potential for increasing the general noise level shall be considered when planning improvements to the City' s circulation system.
- **Policy 3b:** In the event that it is determined that increased noise levels will result from an improvement to the circulation system, mitigation measures shall be required which reduce the noise levels to those determined acceptable.
- **Policy 3c:** Traffic speeds shall be regularly monitored to determine the feasibility of lowering the speeds and thus lower the traffic noise generated.

- **Policy 3d:** The City should examine areas where truck traffic should be restricted in residential areas to reduce adverse noise and vibration levels (See Circulation Element).
- **7.8.1.4 Requirement for Project Specific Noise Studies Objective 4:** Noise studies shall be required for certain projects which have the potential to increase ambient noise levels or the potential to expose sensitive receptors to unacceptable noise levels.
- **Policy 4a:** A noise study shall be required for all projects which will be in violation of Policy 1. Tables N-E and N-F will be used as screening tables to determine the estimated outdoor noise levels and if the project is in violation of Policy 1.
- **Policy 4b:** A noise study shall be required for all projects within 700 feet of railroad tracks (350 feet, if there are intervening buildings). In addition, a vibrational analysis should also be required of residential projects within 200 feet of railroad tracks and any projects within 120 feet of railroad tracks.
- **Policy 4c:** A noise study shall be required for all projects proposing to locate commercial or industrial land uses adjacent to residential land uses (or vice versa) in order to determine the noise impacts to residents.
- **7.8.1.5 Noise Attenuation Measures Objective 5:** Noise attenuation measures shall be required to reduce noise levels to an acceptable level.
- **Policy 5a:** Where feasible, setbacks should be used to mitigate adverse noise conditions, to ensure an acceptable noise exposure level.
- **Policy 5b:** Parcels affected by adverse noise levels should be properly site planned to reduce noise through the following measures:
    a. Uses that are compatible with higher noise levels should be located adjacent to noise generators to block noise from noise sensitive uses.
    b. Clustering of commercial, office, or multi- family uses can reduce interior open space (e.g., courtyard) noise levels.
- **Policy 5c:** Noise barriers and berms shall be required where other noise attenuation measures fail to reduce the adverse levels, or will significantly increase the costs of continuation of land improvements.
- **Policy 5d:** Architectural design in adverse noise areas should shield noise-sensitive uses through:
    a. Proper entrance and window location;
    b. Proper patio and balcony location; building projections and heights; and
    c. Internal arrangement of rooms; and location of air conditioning equipment.

- **Policy 5e:** Construction techniques should consider the following methods of noise reduction:
    a. Acoustical wall design;
    b. Use of dense building materials;
    c. Use of acoustical windows (double glazed, double paned, thick and non-operable windows); and
    d. Use of noise- tight doors, ceilings, and floors.
- **7.8.1.6 Noise Ordinances Objective 6:** The City' s community noise Ordinance shall be consistent with the Policies in the Noise Element.
- **Policy 6a:** The City shall update the community noise ordinance to reflect and implement the Policies in the Noise Element.

City of Calexico Noise Ordinance

Chapter 8.46 of the City's Municipal Code is referred to as the Noise Ordinance. It is intended to prohibit unwanted and unnecessary sounds of all types within the community. Section 8.46.030 establishes limits for fixed and non-stationary sources. It states that "it is unlawful for any person to operate or cause to be operated any single or combination of fixed source or non-stationary source type of equipment or machinery except construction equipment used in connection with construction operations, that individually or collectively constitute an identifiable sound source in such a manner as to cause the sound level at any point on the property line of any property to exceed by five decibels or more, the noise level limits set forth in Section 8.46.031, plus allowances for time duration in Section 8.46.032."

Table 4.10-3: Calexico Property Line Noise Limits, summarizes the noise level limits provided in Section 8.46.031. If the actual measured ambient noise level is higher than the limits summarized in Table 4.10-3, then the ambient noise level limit shall apply. If the measurement location is on a boundary between two different zones, the noise level limit applicable to the lower noise zone plus 5 dB shall apply.

Table 4.10-3: Calexico Property Line Noise Limits

Zone	Time	One-Hour Average Sound Level [dB(A) L_{eq}]
Residential – Low Density	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	40
Residential – High Density	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 10:00 p.m.	60

	10:00 p.m. to 7:00 a.m.	50
Industrial	7:00 a.m. to 10:00 p.m.	70
	10:00 p.m. to 7:00 a.m.	55
SOURCE: City of Calexico Municipal Code Section 8.46.0.31.		

Table 4.10-4: Calexico Property Line Noise Limits Time Duration Correction, summarizes the time duration allowances set forth in Section 8.46.032 that shall apply to the noise level limits in Table 4.10-3 during the daytime hours.

Table 4.10-4: Calexico Property Line Noise Limits Time Duration Correction

Duration of Sound	dB(A) Allowance
Up to 30 minutes per hour	+3
Up to 15 minutes per hour	+6
Up to 10 minutes per hour	+8
Up to 5 minutes per hour	+11
Up to 2 minutes per hour	+15
Up to 1 minute per hour	+18
Up to 30 seconds per hour	+21
Up to 15 seconds per hour	+24
SOURCE: City of Calexico Municipal Code Section 8.46.0.31.	

8.46.042 - Construction.

Section 8.46.042 of the Noise Ordinance addresses noise associated with construction activities.

A. It is unlawful for any person within the city to operate construction tools or equipment in the performance of any outside construction or repair work on buildings and/or structures, between the hours of five p.m. of each day and eight a.m. of the next day if the noise or other sound produced by such work is of such intensity or quality that it disturbs the peace and quiet of any other person of normal sensitivity.
B. No person doing or causing work prohibited by this section, after being informed orally or in writing that such work has caused noise or sounds which disturb any other person's peace and quiet, shall fail, refuse or neglect to take whatever steps or use whatever means are necessary to assure that such dues not again disturb such other person's peace and quiet.

C. Exceptions.

1. Emergency repairs of existing installations or equipment or appliances;
2. Construction work complying with the term of a written early work permit which may be issued by the building official upon a showing of sufficient need due to hot or inclement weather or the use of an unusually long process material, or other circumstances of unusual and compelling nature.

4.10.3 Significance Determination Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to noise would be significant if the project would:

1) Threshold 1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
2) Threshold 2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
3) Threshold 3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
4) Threshold 4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
5) Threshold 5: 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 expose people residing or working in the project area to excessive noise levels?
6) Threshold 6: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

4.10.4 Methodology

The proposed project does not directly propose the construction of new housing or the other development; rather it provides capacity for future development consistent with the RHNA. Thus, while the project does not propose specific development, this analysis assesses the noise impacts from future development at the Housing Sites and Bowker Site. A dual analysis is provided to address the following: (1) a programmatic approach to future development within those Discretionary Development Sites that would be developed under the City's discretionary permit process and therefore subject to subsequent environmental review; and (2) a parcel-specific approach to future development within By-Right Development Sites that would be, or have the potential to be, developed ministerially under the Housing Element. Future development would generate noise from a variety of sources including

transportation (i.e., vehicle traffic), stationary noise, construction noise, and vibration. Methods used to assess noise from each of these sources are discussed below.

Vehicle Traffic Noise

Traffic noise impacts were evaluated using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA RD-77-108), which estimates roadway noise levels based on California vehicle noise emission rates and adjusts for factors such as roadway type, traffic volumes, vehicle speeds, vehicle mix, roadway geometry, grade, ground absorption characteristics, and traffic distribution throughout the day. Noise levels were modeled for three scenarios:

- Baseline (year 2019);
- Buildout (year 2050) of the existing land use and zoning designations (included in report attachments and provided for informational purposes only); and
- Buildout (year 2050) of the proposed HEU land use and zoning designations.

Traffic volume data, trip generation estimates, roadway speeds, and vehicle classifications were obtained from the project transportation study (Appendix I, Transportation Study) and Caltrans traffic counts (Caltrans 2024a and Caltrans 2024b). Peak-hour traffic volumes were converted to daily traffic estimates and used to calculate community noise equivalent levels (CNEL) along roadway segments. Noise contours representing the distances to 75, 70, 65, and 60 CNEL levels were developed to evaluate potential traffic noise increases at nearby land uses. The contour analysis did not account for existing noise barriers, topography, or stationary noise sources, and therefore reflects roadway traffic noise only.

Railroad Noise

As discussed, the Southern Pacific Railroad Company operates freight trains on the railroad tracks that travel north-south in the western portion of the City. Noise associated with railroad operations was modeled using the FTA-recommended Chicago Rail Efficiency and Transportation Efficiency (CREATE) railroad noise model (Harris Miller & Hanson, Inc. 2006). As a conservative analysis, this train was modeled during the nighttime hours. Noise contour distances were calculated assuming flat-site conditions and no intervening buildings that would provide noise attenuation.

Stationary Noise

Stationary sources of noise include activities associated with a given land use. Various land uses contain on-site stationary noise sources, including rooftop heating, ventilation, and air conditioning (HVAC) equipment; mechanical equipment; emergency electrical generators; parking lot activities; loading dock operations; and recreation activities. Stationary noise is

considered a "point source" and attenuates over distance at a rate of 6 dB(A) for each doubling of distance. The exact location and nature of future stationary noise sources is not known at this time and therefore cannot be calculated in this analysis. Impacts were assessed in this analysis by identifying potential types of stationary sources and locations of mixed-use land use interfaces and identifying applicable regulations and mitigation framework for addressing impacts.

Construction Noise

Construction noise has the potential to result in temporary ambient noise increases due to construction activities. Construction noise is usually generated by activities such as diesel-powered construction equipment used for site preparation and grading; removal of existing structures and pavement; loading, unloading, and placing materials and paving. Diesel engine-driven trucks also bring materials to the site and remove the spoils from excavation. Construction equipment with a diesel engine typically generates maximum noise levels from 70 to 95 dB(A) L_{eq} at a distance of 50 feet (FHWA 2006 and 2008; FTA 2018). See Table 7 in Appendix H for typical construction equipment noise levels and duty cycles.

Hourly average construction noise levels would be approximately 83 dB(A) L_{eq} at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. Noise levels would vary depending on the nature of the construction, including the duration of specific activities, nature of the equipment involved, location of the particular receiver, and nature of intervening barriers.

Vibration

Potential sources of groundborne vibration include construction activities, railroad activities, and stationary sources. Table 4.10-5: Vibration Levels for Construction Equipment, lists vibration levels for construction equipment.

Table 4.10-5: Vibration Levels for Construction Equipment

Equipment	Approximate PPV Vibration Level at 25 feet (inch/second)
Pile Driver, Impact (Upper Range)	1.518
Pile Drive, Impact (Typical)	0.644
Pile Driver, Sonic (Upper Range)	0.734
Pile Drive, Sonic (Typical)	0.170
Vibratory Roller	0.210
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003
SOURCE: FTA 2018. PPV = peak particle velocity	

4.10.5 Issue 1: Noise Standards

Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

4.10.5.1 Impact Analysis

Vehicle Traffic Noise

Increase in Ambient Noise

The proposed project would contribute traffic to area roadways that would result in an increase in ambient noise. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive land uses to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the so-called ambient environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged.

Based on the Federal Interagency Committee on Noise (FICON) guidance, the specific noise threshold levels are based on typical responses to noise level increases of 5 dB(A) or readily perceptible, 3 dB(A) or barely perceptible, and 1.5 dB(A) depending on the underlying without-project noise levels for noise sensitive land uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. Based on this guidance, long-term traffic noise that affects sensitive land uses would be considered substantial and constitute a significant noise impact if the project would:

- Increase noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

The following noise analysis is based on the baseline year 2019 condition and the future year 2050 condition under the Housing Element. As discussed in Section 4.10.1.2, Vehicle Traffic Noise, CNEL values were calculated using both the AM and PM peak hour intersection turning volumes provided in the Transportation Study (Appendix I). Noise levels and the associated project-related increases that were calculated using AM and PM peak hour data, as detailed in Appendix H. Appendix H Tables 9 and 10, determine that the noise level increase would exceed the screening level thresholds adjacent to the following two roadway segments:

- Cole Boulevard west of SR-111/Imperial Avenue
- SR-111/Imperial Avenue north of Cole Boulevard

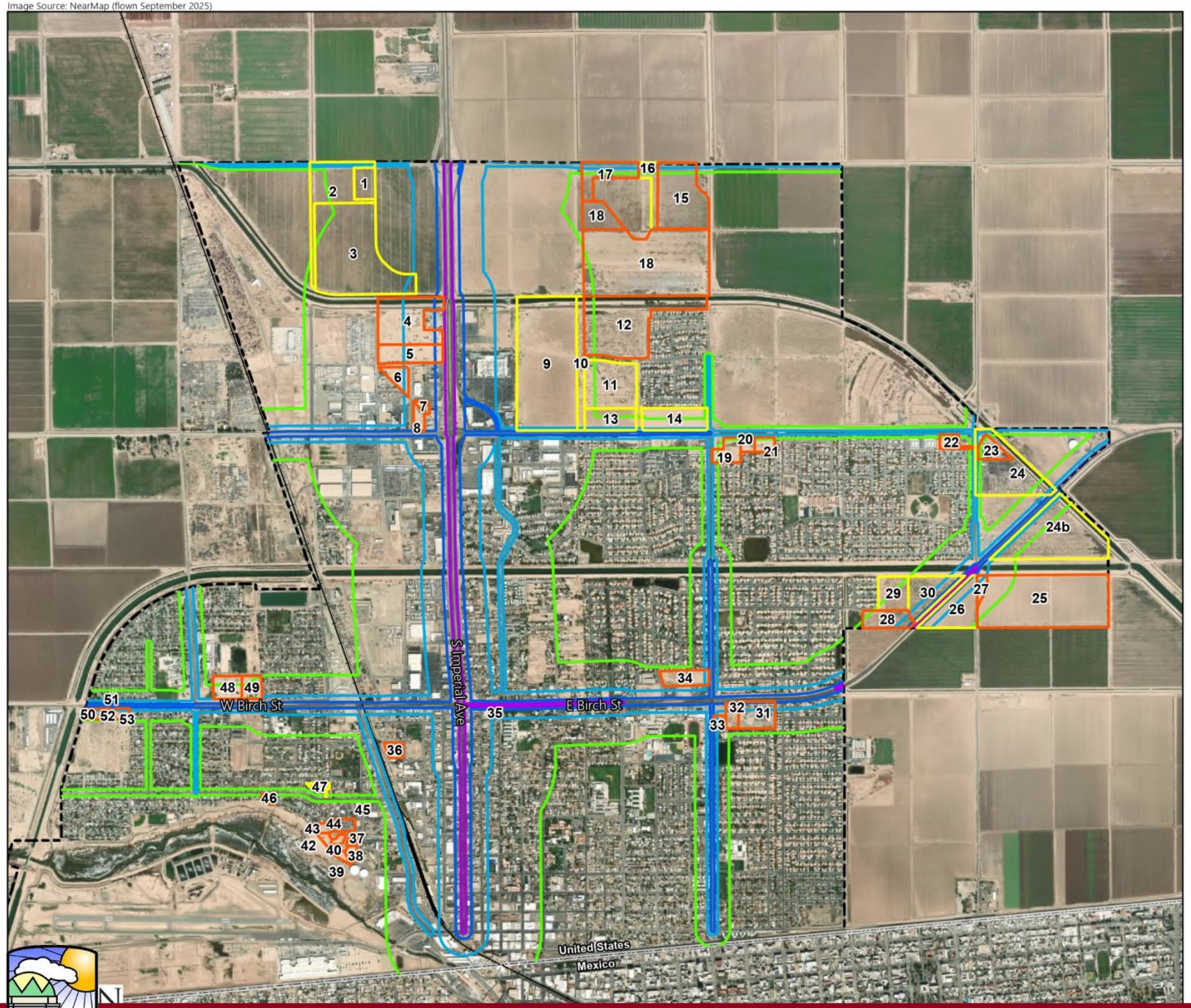
A noise-sensitive land use would need to be exposed to the noise level increase in order to result in a significant impact. There are no existing noise-sensitive land uses located adjacent to Cole Boulevard west of SR-111/Imperial Avenue or adjacent to SR-111/Imperial Avenue north of Cole Boulevard. Therefore, impacts associated with the increase in ambient noise levels **would be less than significant**.

Land Use Compatibility

The Noise Element of the City's General Plan establishes acceptable noise exposure levels for various land uses. As discussed in Section 4.10.2, Regulatory Framework, Policy 1 of the City of Calexico Noise Element establishes exterior and interior noise level compatibility standards of 65 and 45 CNEL, respectively.

Future year 2050 vehicle traffic noise contours under buildout of the HEU as calculated using AM peak hour traffic data are provided in Figure 4.10-5a: Future Year 2050 Vehicle Traffic Noise Contours – AM Peak Traffic. Future year 2050 vehicle traffic noise contours under buildout of the HEU as calculated using PM peak hour traffic data are provided in Figure 4.10-5b: Future Year 2050 Vehicle Traffic Noise Contours – PM Peak Traffic.

Image Source: NearMap (flown September 2025)



Calexico City Boundary
By-Right Development Sites
Discretionary Development Sites

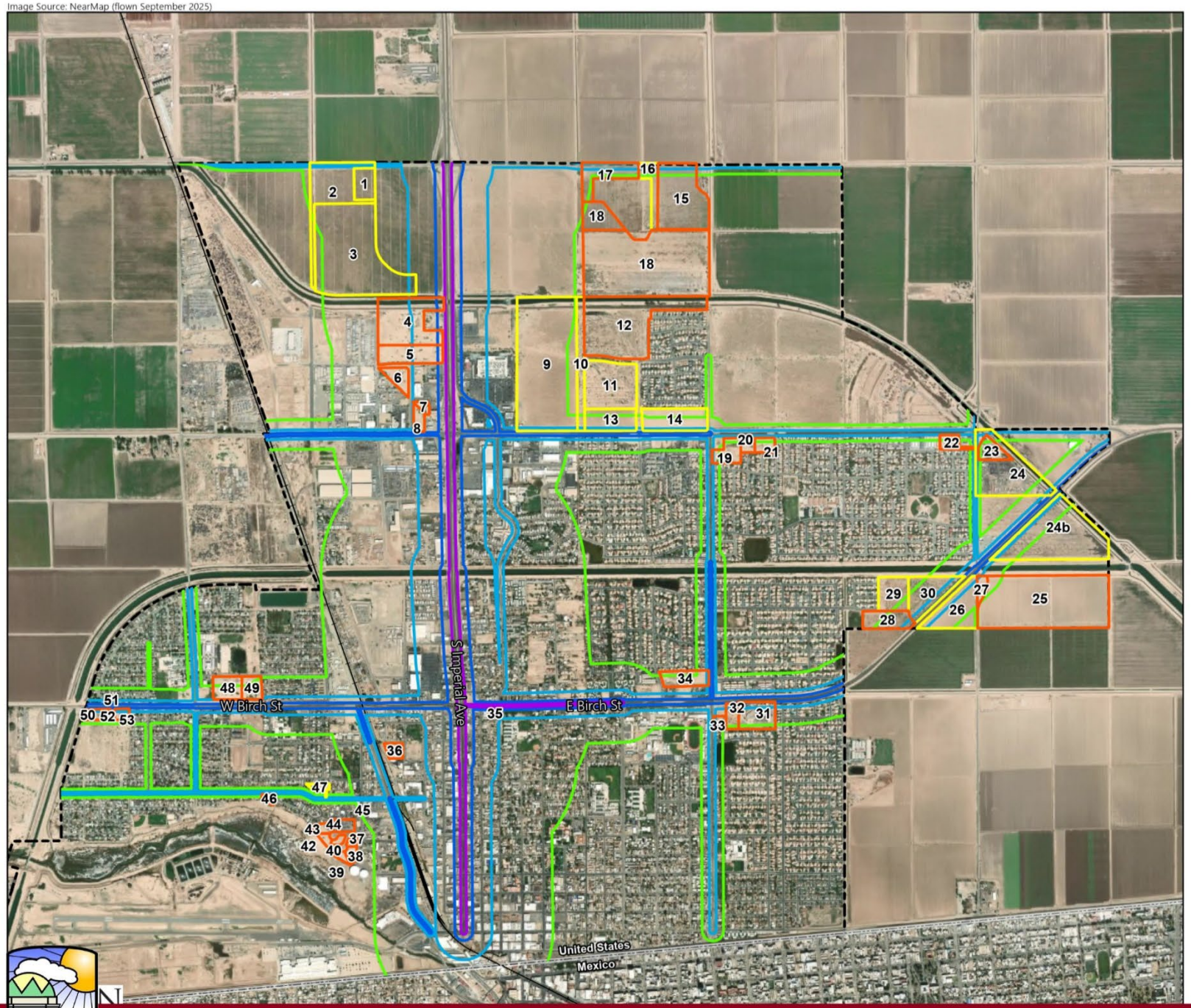
Vehicle Traffic Noise Contours

60 CNEL
65 CNEL
70 CNEL
75 CNEL

Figure 4.10-5a:

Future Year 2050 Vehicle Traffic Noise Contours - AM Peak Hour Traffic

Image Source: NearMap (flown September 2025)



Calexico City Boundary
By-Right Development Sites
Discretionary Development Sites

Vehicle Traffic Noise Contours

60 CNEL
65 CNEL
70 CNEL
75 CNEL

Figure 4.10-5b:

Future Year 2050 Vehicle Traffic Noise Contours - PM Peak Hour Traffic

Noise compatibility impacts are summarized in Table 4.10-6: Noise Compatibility Impacts. As shown, noise levels are projected to exceed the compatibility standard of 65 CNEL at the following Discretionary Development Sites: 3 and 24a. Additionally, noise levels are projected to exceed 65 CNEL at the following By-Right Development Sites: 4 through 10, 13, 14, 19, 26, 27, 28, 30 through 35, and 50 through 53.

Table 4.10-6: Noise Compatibility Impacts

Housing Site	Compatibility Standard (CNEL)	Exceeds Standard?	Distance from road where standard is exceeded
1	65	No	--
2	65	No	--
3	65	Yes	811 feet from SR-111
4	65	Yes	931 feet from SR-111
5	65	Yes	931 feet from SR-111
6	65	Yes	931 feet from SR-111
7	65	Yes	931 feet from SR-111 (entire site)
8	65	Yes	931 feet from SR-111 and 162 feet from Cole Boulevard (entire site)
9	65	Yes	104 feet from Cole Boulevard
10	65	Yes	104 feet from Cole Boulevard
11	65	No	--
12	65	No	--
13	65	Yes	104 feet from Cole Boulevard
14	65	Yes	104 feet from Cole Boulevard
15	65	No	--
16	65	No	--
17	65	No	--
18	65	No	--
19	65	Yes	59 feet from Meadows Road
20	65	No	--
21	65	No	--
22	65	No	--
23	65	No	--
24a	65	Yes	158 feet from SR-98
24b	75	No	--
25	65	No	--

Housing Site	Compatibility Standard (CNEL)	Exceeds Standard?	Distance from road where standard is exceeded
26	65	Yes	308 feet from SR-98
27	65	Yes	308 feet from SR-98
28	65	Yes	308 feet from SR-98
29	65	No	--
30	65	Yes	308 feet from SR-98
31	65	Yes	269 feet from SR-98
32	65	Yes	269 feet from SR-98
33	65	Yes	107 feet from Andrade Avenue
34	65	Yes	129 feet from Meadows Road
35	65	Yes	740 feet from SR-111 and 346 feet from SR-98 (entire site)
36	65	No	--
37	65	No	--
38	65	No	--
39	65	No	--
40	65	No	--
41	65	No	--
42	65	No	--
43	65	No	--
44	65	No	--
45	65	No	--
46	65	No	--
47	65	No	--
48	65	No	--
49	65	No	--
50	65	Yes	151 feet from SR-98
51	65	Yes	151 feet from SR-98
52	65	Yes	151 feet from SR-98
53	65	Yes	151 feet from SR-98
SOURCE: Appendix H, Attachment 3.			

The interior noise level standard for residential uses is 45 CNEL. Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions

depending on the type of structure and window. Standard light-frame construction would reduce exterior to interior noise levels by at least 20 dB (FHWA 2011). Thus, interior noise levels are expected to exceed the 45 CNEL requirement for the same Discretionary Development Sites and By-Right Development Sites identified above.

Existing regulatory framework exists within the City's General Plan that would address noise compatibility for both Discretionary Development Sites and By-Right Development Sites. Section 7.8.1.4 of the Calexico Noise Element includes requirements for project-specific noise studies. Objective 4 states that "Noise studies shall be required for certain projects which have the potential to increase ambient noise levels or the potential to expose sensitive receptors to unacceptable noise levels". Through implementation of this existing regulatory framework, for the housing sites located where noise levels have the potential to exceed 65 CNEL, site-specific noise studies would demonstrate how noise levels would be reduced to acceptable levels. Thus, noise compatibility impacts for both Discretionary Development Sites and By-Right Development Sites would be **less than significant**.

Railroad Noise

Railroad noise contours are shown in Figure 4.10-3: Railroad Noise Contours, and calculations are provided in Attachment 4 of Appendix H. Housing site 36 is located the closest to the railroad tracks. Railroad noise levels were calculated to be 56 CNEL at 50 feet from the railroad tracks. As shown in Figure 4.10 3, based on the existing railroad crossing inventory, railroad noise levels are not projected to exceed 55 CNEL. Additionally, Noise Element Section 7.8.1.4 Objective 4, Policy 4(b) states that "A noise study shall be required for all projects within 700 feet of railroad tracks (350 feet, if there are intervening buildings). In addition, a vibrational analysis should also be required of residential projects within 200 feet of railroad tracks and any projects within 120 feet of railroad tracks." Housing site 36, a By-Right Development Site, is the only site located within 700 feet of the railroad tracks. Through implementation of this existing regulatory framework, a site-specific noise study for housing site 36 would demonstrate how noise levels due to railroad activity would be reduced to acceptable levels. Thus, noise compatibility impacts related to railroad noise **would be less than significant**.

Stationary Noise

Future development of the housing sites would include residential land uses that are not anticipated to be a significant source of stationary noise. For housing sites that are located in close proximity to existing commercial and industrial land uses, enforcement of the City's Municipal Code would ensure that noise generated at existing commercial and industrial properties would not exceed the noise level limits summarized in Table 4.10-3: Calexico Property Line Noise Limits. Additionally, Noise Element Section 7.8.1.4 Objective 4, Policy

4(c) states that "A noise study shall be required for all projects proposing to locate commercial or industrial land uses adjacent to residential land uses (or vice versa) in order to determine the noise impacts to residents." Through implementation of this existing regulatory framework, a site-specific noise study for housing sites located adjacent to existing commercial or industrial land uses would demonstrate how noise levels due to these sources would be reduced to acceptable levels. Thus, noise impacts related to commercial and industrial noise sources **would be less than significant**.

The Bowker Site (Site 24b) would allow for the construction of a new industrial land use. Potential noise sources associated with this use could include trucks, loading docks, and mechanical equipment, among others. However, the Bowker Site is a Discretionary Development Site and any future development would undergo independent environmental review under CEQA. At that time, stationary noise sources would be evaluated and, if necessary, measures will be identified to reduce potential noise levels to the limits established in the City's Municipal Code. To ensure this condition is met, mitigation measure, **MM NOI-1**, Bowker Site Industrial Noise Sources, would be implemented to reduce impacts to **less than significant**.

Construction Noise

Future development implemented under the project could result in a temporary ambient noise increase due to construction activities. Construction noise would be short term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and the use of power tools. Noise would also be generated by construction equipment use, including earthmovers, material handlers, and portable generators, and could reach high noise levels for brief periods. Significant noise impacts may occur from operation of heavy earthmoving equipment and truck haul that would occur with construction of individual development projects. Implementation of the project anticipates an increase in development intensity.

Future development at the housing sites would be subject to the City's Noise Ordinance Section 8.46.042 which regulates noise associated with construction equipment and activities through time of day restrictions (e.g., days of the week and hours of operation).

As discussed in Section 4.10.4, Methodology, the proposed hourly average construction noise levels would be approximately 83 dB(A) L_{eq} at 50 feet from the center of construction activity. This noise level would attenuate to the FTA daytime construction noise level threshold of 80 dB(A) $L_{eq(8)}$ at approximately 70 feet. As this 80 dB(A) $L_{eq(8)}$ threshold is based on an 8-hour average and construction equipment would move throughout a project site during an 8-hour period, the acoustic center of construction activities can be assumed to be

the center of the project site. The center of each of the 53 housing sites and the Bowker Site is located more than 70 feet from the property boundaries. Therefore, it is not anticipated that noise levels would exceed 80 dB(A) $L_{eq(8)}$ at any of the property boundaries when evaluating construction noise over an 8-hour period.

Although residences adjacent to the housing sites would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Both Discretionary Development Sites and By-Right Development Sites would be required to adhere to the time of day restrictions and notification requirements of the City's Noise Ordinance Section 8.46.042. With adherence to the requirements of the City's Municipal Code, construction noise impacts would be **less than significant**.

4.10.5.2 Mitigation Framework

Stationary noise impacts related to potential industrial noise generated at the Bowker Site would be significant and require mitigation. The following mitigation measures shall be applied to the Discretionary Development Site #24b, the Bowker Site:

MM NOS-1: Bowker Site Industrial Noise Sources. Prior to the issuance of building permits for the Bowker Site, a site-specific noise analysis shall be prepared that evaluates noise levels generated by on-site equipment and activities. The noise study shall include noise reduction measures necessary to reduce noise levels to the applicable limits established in Section 8.46.031 of the City's Municipal Code.

4.10.5.3 Significance After Mitigation

With implementation of mitigation measure NOS-1, noise impacts associated with the Bowker Site would be reduced to **less than significant with mitigation** incorporated.

4.10.6 Issue 2: Groundborne Noise and Vibration

Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

4.10.6.1 Impact Analysis

Construction Vibration

Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The degree and amplitude of groundborne vibration would vary, depending on the soil type, ground profile, distance to the receptor building, and the construction characteristics of the receptor building. The results

from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, and to damage to the structure and/or infrastructure at the highest levels. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. Based on several federal studies, the threshold of perception is 0.035 inches per second (in/sec) peak particle velocity (PPV), with 0.24 in/sec PPV being distinctly perceptible (Caltrans 2020).

Generally, vibration levels at nearby off-site receptors would be the highest during the excavation, shoring, and foundation phases in the first months of construction. Development of housing projects of four or less stories is not expected to require pile driving, blasting, or other construction activities with high levels of transient vibration. Thus, the equipment with the greatest potential to generate goundborne vibration is a large bulldozer. As further documented in Appendix H, a large bulldozer generates a vibration level of 0.089 in/sec PPV at 25 feet. A large bulldozer would generate a vibration level 0.3 in/sec PPV at 8 feet, 0.2 in/sec PPV at 12 feet, and 0.12 in/sec PPV at less than 20 feet. Therefore, groundborne vibration impacts associated with construction activities would be **potentially significant**, and mitigation would be required for both Discretionary Development Sites and By-Right Development Sites.

Railroad Vibration

As discussed in Section 4.10.1.3, Railroad Noise, the Southern Pacific Railroad Company operates freight trains on the railroad tracks that travel north-south in the western portion of the City. A significant vibration impact may occur if residential land uses are exposed to vibration levels of 80 vibration decibels.

As further discussed in Appendix H, using the generalized ground surface vibration curves based the North American transit systems, residential land uses would be exposed to significant vibration levels within approximately 80 feet of the railroad tracks. There are no proposed housing sites located within 80 feet of the railroad tracks. Housing site 36 is located 140 feet from the railroad tracks. Thus, groundborne vibration from freight trains would be **less than significant**.

Airport Noise

As shown in Figure 4.10-4, Calexico International Airport Noise Contours, the 60 CNEL noise contours do not extend beyond the airport property boundaries. Therefore, adjacent land uses would not be exposed to airport noise that exceeds 60 CNEL. Impacts associated with airport noise would be **less than significant**.

4.10.6.2 Mitigation Framework

The following mitigation measure is recommended for future development proposals:

MM NOS-2: Construction Vibration. For Discretionary Development, prior to issuance of a building permit for a project requiring heavy construction equipment such as large bulldozers within 20 feet of fragile buildings, 12 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or 8 feet of engineered concrete and masonry buildings, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

By-Right Development Sites shall comply with applicable regulatory requirements addressing the same resource protections identified above, as established through the City's Zoning Ordinance. Consistent with Housing Element Program 2E, the Zoning Ordinance will be amended to establish a ministerial review process and applicable requirements for by-right development.

4.10.6.3 Significance After Mitigation

With implementation of **MM NOS-2**, groundborne vibration impacts associated with the Discretionary Development Sites and By-Right Development Sites within close proximity to structures would be reduced to **less than significant**.

4.10.7 Issue 3: Airport Noise

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, and expose people residing or working in the area to excessive noise levels?

4.10.7.1 Impact Analysis

As discussed in Section 4.10.1.4, Aircraft Noise, the Calexico International Airport is located in the southwest portion of the City. Airport noise contours were obtained from the Imperial County ALUCP and are shown in Figure 4.10-4: Calexico International Airport Noise Contours. As shown, the 60 CNEL noise contours do not extend beyond the airport property boundaries. Therefore, adjacent land uses would not be exposed to airport noise that exceeds 60 CNEL. Impacts associated with airport noise would be less than significant.

4.10.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.10.7.3 Significance After Mitigation

Impacts would be **less than significant.**

4.11 Population and Housing

This section analyzes potential impacts associated with population and housing that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description of this EIR. The Housing Element designates 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). The analysis focuses on growth in population directly and indirectly related to buildout of future development of sites detailed in Table 3-2, Sites Inventory. This section is based on data available from the California Department of Finance, Southern California Association of Governments (SCAG), and the Calexico General Plan Housing Element.

4.11.1 Existing Conditions

4.11.1.1 Regional Setting

Calexico is located within Imperial County. The following information is sourced from City of Calexico Housing Element (2026), SCAG, and the U.S. Census.

Population

The SCAG Demographics and Growth Forecast Report bases population, economic and housing forecasts off the U.S. Census data, projecting forecasted data through 2050. Table 4.11-1: Population Growth, 2019-2050, displays actual and projected populations for the City of Calexico and surrounding jurisdictions from 2019 to 2050. The SCAG data for Calexico estimates a 5,600 person increase, or 14.43 percent, from 2019 to 2035, and a 3,000 person increase, or 6.76 percent, from 2035 to 2050, which is slightly higher than Imperial County's projected growth of 9.39 and 6.06 percent, respectively.

Table 4.11-1: Population Growth, 2019-2050

Jurisdictions	Population			Percent Change	
	2019 Actual	2035 Projected	2050 Projected	2019-2035	2035-2050
Brawley	26,600	28,700	30,500	7.89%	6.27%
Calexico	**38,800**	**44,400**	**47,400**	**14.43%**	**6.76%**
Calipatria	6,600	7,300	7,500	10.61%	2.74%
El Centro	44,600	47,600	50,900	6.73%	6.93%
Holtville	5,700	5,900	6,200	3.51%	5.08%
Imperial City	20,400	22,900	24,500	12.25%	6.99%
Westmorland	2,000	2,000	2,000	0%	0%
Imperial County	181,000	198,000	210,000	9.39%	6.06%

Source: SCAG 2024 Demographics and Growth Forecast Technical Report.

Housing

Table 4.11-2: Household Growth Forecast, depicts the SCAG 2019 to 2050 Demographics and Growth Forecast for expected household growth in Calexico and surrounding jurisdictions. Calexico is projected to experience a 35.58 percent increase from 2019 to 2035, and a 12.06 percent increase from 2035 to 2050 in household growth. Among surrounding jurisdictions, Calexico is expected to experience the most population growth followed by Imperial City and Brawley. Overall, Imperial County can expect 25 percent increase in total households from 2019 to 2035, and a 10.77 percent increase from 2035 to 2050, going from 52,000 households in 2019 to 72,000 by 2050.

Table 4.11-2: Household Growth Forecast

Jurisdictions	Households			Percent Change	
	2019 Actual	2035 Projected	2050 Projected	2019-2035	2035-2050
Brawley	8,200	9,900	11,000	20.73%	11.11%

Calexico	**10,400**	**14,100**	**15,800**	**35.58%**	**12.06%**
Calipatria	1,000	1,300	1,400	30%	7.69%
El Centro	14,000	16,600	18,700	18.57%	12.65%
Holtville	1,700	1,900	2,100	11.76%	10.53%
Imperial City	6,000	7,900	8,800	31.67%	11.39%
Westmorland	600	600	600	0%	0%
Imperial County	52,000	65,000	72,000	25%	10.77%

Source: SCAG 2024 Demographics and Growth Forecast Technical Report.

Employment

According to the 2019 United States Census Bureau American Community Survey (ACS) survey data, Calexico experienced a 15.3 percent unemployment rate, slightly higher than Imperial County. Brawley and Holtville experienced a higher unemployment rate than Calexico and Imperial County, while El Centro had the lowest unemployment rate of 13.1 percent. Based on the data summarized in Table 4.11-3: Unemployment Rate, 2019, approximately 15.3 percent of Calexico's population was without work in 2019 and would therefore be more likely to require more affordable housing options. For those that are employed, income level can further identify housing types and needs. According to the SCAG Draft Regional Housing Needs Assessment (RHNA) Methodology, housing needs by income are broken down into four income levels:

- Very Low Income (50 percent or less of the county's median income)
- Low Income (50-80 percent of the county median income)
- Moderate Income (80-120 percent of the county median income)
- Above Moderate Income (120 and above of the county median income)

Table 4.11-3: Unemployment Rate, 2019

Jurisdiction	Unemployment Rate*
Brawley	18.0%
Calexico	**15.3%**
El Centro	13.1%
Holtville	17.8%
Imperial County	14.2%

Source: American Community Survey, 5-Year Estimates, 2019
*Population 16 years and over

4.11.2 Regulatory Framework

4.11.2.1 State

Senate Bill 375 and Assembly Bill 1233

Senate Bill 375 (SB 375), known as the Sustainable Communities and Climate Protection Act, was enacted in 2008. SB 375 aims to cut greenhouse gas emissions, as detailed in Section 4.6, Greenhouse Gas Emissions of this EIR. To achieve this, the act mandates that regional housing needs be coordinated with regional transportation planning, thereby integrating housing, land use, and transportation strategies. In the Southern California region, this unified regional planning effort is completed by SCAG via Connect SoCal 2024 (Regional Transportation Plan/Sustainable Communities Strategy). Additionally, SB 375 stipulates that the RHNA must be updated every eight years. Jurisdictions failing to comply with this requirement may face penalties under both SB 375 and Assembly Bill 1233.

AB 686 (Affirmatively Fair Housing)

Assembly Bill 686 (Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), and 65583.2(a)) requires public agencies to administer housing and community development programs in a manner that affirmatively furthers fair housing. The legislation requires Housing Elements to include an assessment of fair housing conditions within the jurisdiction and to establish implementation programs with a defined schedule of actions during the planning period to support housing goals and policies. In addition, the law requires jurisdictions to prepare an inventory of land suitable and available for development, including identified housing sites with adequate capacity to accommodate the jurisdiction's share of regional housing needs across all income categories.

SB 9 (Housing Development; Approvals)

Senate Bill 9 (Government Code Sections 66452.6, 65852.21, and 66411.7) establishes ministerial approval processes for certain housing developments in single-family residential zones. The law allows for the construction of up to two units on a single-family lot or the subdivision of a residential parcel into two lots (or both), without discretionary review. In effect, these provisions can enable the development of up to four housing units on a site that would previously have permitted only one unit subject to discretionary approval.

AB 130

Assembly Bill 130 establishes a statutory CEQA exemption for qualifying infill housing development projects, thereby streamlining the environmental review process for eligible

residential and mixed-use development. Under this framework, housing projects that meet specified criteria are exempt from CEQA review, reducing the potential for environmental litigation or delays that could otherwise impede project approval or feasibility, particularly where projects are consistent with applicable planning and zoning requirements.

Housing Element Law

California planning and zoning law requires every city and county to adopt a General Plan to guide future growth and development, pursuant to California Government Code Section 65300. A required component of the General Plan is the Housing Element, which identifies housing needs across all income levels and establishes opportunities for housing development sufficient to address those needs. Housing Elements are also developed in consideration of a jurisdiction's assigned share of regional housing need through the RHNA process.

California Housing Element law (Government Code Sections 65580–65589) requires each city and county to identify and evaluate existing and projected housing needs within its jurisdiction and establish goals, policies, and implementation programs that support the development, preservation, and improvement of housing opportunities for all economic segments of the community. The Housing Element is intended to achieve several key legislative objectives, including:

- Identifying sufficient sites to facilitate and encourage the development, maintenance, and improvement of housing for households at all income levels, including persons with disabilities.
- Reducing governmental constraints, where legally feasible and appropriate, that limit the development, maintenance, and improvement of housing opportunities for individuals of all income levels, including persons with disabilities.
- Supporting the development of housing adequate to meet the needs of low- and moderate-income households.
- Preserving and improving existing housing stock and neighborhood conditions, including affordable housing resources.
- Promoting equal housing opportunities regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserving publicly assisted multifamily housing developments that serve lower-income households within each community.

Regional Housing Needs Assessment (RHNA)

To respond to California population and household growth, and to ensure the availability of decent affordable housing for all income groups, the State enacted the Housing Element law that requires SCAG and other councils of governments to periodically distribute the State

identified housing need for their regions. As discussed in Section 3.2 and above, local jurisdictions are required by State law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing reconstruction needs in their region over a specified planning period. Housing unit construction goals are set by the California Department of Housing and Community Development (HCD) and allocated to cities through regional planning agencies. HCD is responsible for determining this regional need and initiating the process by which each region must then distribute their share of statewide need to all jurisdictions within its region.

The City of Calexico has recently updated their Housing Element for an eight-year planning period spanning 2021 through 2029 (6th Cycle Housing Element Update; 2021-2029 Housing Element). The City's RHNA allocation for the 6th Cycle Housing Element Update is a total of 4,828 units of total new construction, allocated by income level categories as follows:

- Very Low Income and Below: 1,279 units (26.3 percent of total)
- Low Income: 655 units (13.5 percent of total)
- Moderate Income: 614 units (12.6 percent of total)
- Above Moderate Income: 2,320 units (47.7 percent of total)

California Housing Accountability Act

The California Housing Accountability Act (Government Code Section 65589.5), enacted in 2017, limits the ability of local governments to deny or impose conditions that would render housing development projects, including emergency shelters, infeasible when such projects contribute toward meeting or exceeding the jurisdiction's assigned regional housing need allocation.

Housing Density Bonus Law

California Government Code Sections 65915–65918 authorize increases in the number of residential units permitted under applicable land use designations or zoning regulations through a density bonus program. In exchange, developers may provide affordable housing, senior housing, or land dedicated to affordable housing development and may also qualify for incentives, concessions, or waivers and reductions of development standards.

4.11.2.2 Regional

Connect SoCal 2024 (Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS))

In April 2024, the Southern California Association of Governments (SCAG) adopted the latest Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This federally and State-mandated plan sets a long-range, fiscally constrained framework for transportation investments across the SCAG region, including Imperial County, through

2050. The RTP/SCS supports sustainable growth by forecasting population, housing, and employment trends, identifying transportation priorities, and aligning regional planning with environmental and economic objectives.

In addition, the Imperial Valley Regional Long-Range Transportation Plan (IVRTP), finalized in February 2024, identifies county-specific transportation priorities and complements Connect SoCal's broader regional framework. The IVRTP provides further guidance on anticipated transportation needs that may be supported through infrastructure improvements in and around the County, including the City of Calexico.

4.11.2.3 Local

General Plan

6th Cycle Housing Element

The City's proposed 6th Cycle Housing Element is designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. The Housing Element is an eight-year plan for the 2021-2029 period. State law requires housing elements to be updated periodically to reflect a community's changing housing needs. A critical measure of compliance with the State Housing Element law is the ability of a jurisdiction to accommodate its share of the RHNA. For the Southern California region, the regional growth projected by the State was for the period between July 1, 2021 and October 1, 2029.

Municipal Code

Chapter 17 – Zoning

The City Zoning Ordinance is consistent with the City's General Plan and contains development standards that regulate the type, location, density, and scale of residential development within the City. The Zoning Code serves to implement the General Plan and establish regulations intended to promote and protect public health, safety, and welfare, while supporting comprehensive and orderly land use planning. The development standards also help guide compatible development patterns and preserve the character and integrity of existing residential neighborhoods within the City. The existing zone assigned to each of the proposed rezone sites is listed in Table 3-2, Sites Inventory, and Figure 2-4, Existing Zoning, and the proposed zones are shown on Figure 3-3, Proposed Zoning.

4.11.3 Significance Determination Thresholds

Consistent with the CEQA Guidelines, impacts related to population/housing would be significant if the project would:

1) Threshold 1: 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).
2) Threshold 2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.11.4 Methodology

The population and housing analysis is based on data from the Southern California Association of Governments (SCAG), the California Department of Finance, the City of Calexico General Plan Housing Element, and the City's RHNA for the 2021–2029 planning period. Population and household growth forecasts from the SCAG 2019–2050 Demographics and Growth Forecast (2024) were reviewed and compared to the housing capacity facilitated by implementation of the proposed Housing Element Update and associated rezone sites. The analysis evaluates whether implementation of the project would result in substantial unplanned population growth or displacement of existing housing or residents.

The project consists primarily of policy updates and zoning changes intended to accommodate the City's RHNA and facilitate future residential development consistent with State housing law. The Housing Element Update does not approve or construct specific development projects and therefore would not directly result in physical population or housing changes. However, future development on the identified rezone sites could increase housing capacity within the City and accommodate projected population growth. The analysis therefore considers whether future growth associated with implementation of the Housing Element would exceed regional growth forecasts, require construction of new or expanded infrastructure that could induce additional growth, or displace existing housing or residents. Potential physical environmental effects associated with future residential development, including impacts related to transportation, utilities, public services, air quality, noise, and other environmental issue areas, are evaluated throughout this DEIR.

4.11.5 Issue 1: Induce Unplanned Population Growth

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

4.11.5.1 Impact Analysis

Implementation of the project would include adoption of rezoning actions necessary to support the Housing Element, as identified in Table 3-2, Sites Inventory. The City's 2021–2029 RHNA allocation of 4,828 units was established by SCAG based on regional population,

household, and housing demand forecasts. The identified housing sites, including the proposed rezones, would create the potential for development of up to 5,794 residential units. Using the City's 2024 average household size of 3.82 persons per household, this theoretical buildout could accommodate approximately 22,133 residents; however, this estimate is conservative because SCAG's 2024 Connect SoCal forecast assumes a lower household size of 2.63 persons per household (P:H) by 2050. The projected project population represents a maximum planning capacity rather than a forecast of future housing construction or population growth. It also should be noted that some of the future units may also serve existing residents, meaning the RHNA of 4,828 units represents a conservative estimate of net new housing need.

The Housing Element intentionally identifies capacity in excess of the City's RHNA allocation of 4,828 units (and thus projected residents) to provide a planning buffer that accounts for market conditions, site constraints, housing product variations, and uncertainty regarding the timing and feasibility of development. The project would not expand the City's planning boundaries or sphere of influence, annex undeveloped lands, establish new growth areas or require major infrastructure extensions into previously undeveloped areas. Rather, it would facilitate development within the existing urbanized area and areas already planned for urban development where infrastructure, utilities, transportation facilities, and public services have been planned to accommodate projected growth.

Because the project is consistent with SCAG's RTP/SCS growth assumptions and would accommodate forecasted housing demand within the City's existing urban footprint, it would not induce substantial population growth beyond that anticipated in regional demographic forecasts. Therefore, impacts related to growth inducement would be less than significant.

4.11.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.11.5.3 Significance After Mitigation

Future development facilitated by the project would be consistent with the 2021-2029 RHNA, the existing General Plan, and SCAG Regional Growth forecast. The project would update the existing General Plan to be consistent with the RHNA and would incorporate the City’s land use and zoning changes facilitated by the project. The project does not include the extension of roadways or other infrastructure. Therefore, the project would not induce substantial unplanned population growth, either directly or indirectly, and most rezone sites are located within existing developed areas with adequate access to current infrastructure. Furthermore, the purpose of the project is to facilitate implementation of the Housing Element. Therefore, the project would not induce substantial unplanned population growth

in Calexico, either directly or indirectly; impacts would be **less than significant**. No mitigation is required.

4.11.6 Issue 2: Displace People or Housing

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

4.11.6.1 Impact Analysis

The proposed project itself does not approve specific development proposals or authorize demolition of existing housing. Rather, the Housing Element Update and associated rezones establish land use policies and zoning changes intended to facilitate future housing opportunities consistent with State housing law and regional housing needs. Implementation of the project would support future residential development and redevelopment within the City through adoption of rezones associated with the Housing Element.

The proposed land use designation and the proposed rezone sites identified in Table 3-2, Sites Inventory, would introduce an opportunity for more residential uses in the City to facilitate the development of needed housing, such as townhouses, single-family, and apartments and condominiums. As such, the project is projected to increase the overall number of dwelling units and provide additional housing opportunities to serve the diverse needs of the community at various socioeconomic levels. Future redevelopment of sites containing existing residential uses, such as site 23, could result in removal of existing housing units and displacement of current occupants. However, the precise number of housing units and people that could be displaced cannot reasonably be foreseen at this programmatic level of analysis. Any future redevelopment projects occurring on rezone sites would be required to comply with applicable State laws related to tenant protections, relocation assistance, and replacement housing requirements, where applicable. Additionally, the Housing Element contains anti-displacement programs (see Housing Element Program 1A, 1B, 1C, 2C, 2D, 3A, 3D, 3E, 3G, 3H, 3I, 5A, 5B, 5C, 5D, 5E, 5F, 5I, and 5K) that address displacement pressures. In addition, redevelopment of sites with existing residential uses would allow construction of housing at densities greater than currently exists on the sites, resulting in a net increase in housing capacity within the City.

Although redevelopment of site 23 could result in localized displacement, such displacement would not necessitate construction of replacement housing elsewhere because implementation of the project would support a net increase in housing capacity in the City. Therefore, the project would not result in an indirect environmental impact associated with the construction of replacement housing elsewhere. Impacts related to displacement of existing people or housing would be less than significant.

4.11.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.11.6.3 Significance After Mitigation

Future redevelopment within housing and rezone sites that support residential land uses would have the potential to displace some people and housing on a small number of non-vacant sites. However, for each home that would be removed, more housing units would be provided in its place which would accommodate more people and ensure no net loss of housing. Therefore, impacts would be **less than significant**. No mitigation is required.

4.12 Public Services and Recreation

This section analyzes potential impacts to public services and recreation that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). Public services and facilities are those functions that serve residents, businesses, and community members on a community-wide basis. These functions include fire protection and emergency medical services, police protection, public schools, libraries, and parks and recreation.

Existing conditions were developed using current information obtained from City departments and service providers in 2026. Background information was supplemented from the City's adopted 2007 General Plan and 2015 Draft General Plan Update where relevant. Current staffing, response times, operational needs, and facility conditions were confirmed through consultation with the City of Calexico Fire Chief, City of Calexico Chief of Police Chief, Assistant Superintendent of Business Services for the Calexico Unified School District, City of Calexico Public Works Manager, and the City of Calexico Library Manager in June 2026.

4.12.1 Existing Conditions

4.12.1.1 Fire Protection and Emergency Medical Services

The Calexico Fire Department (CFD) provides fire and paramedic service in the City. The CFD is overseen by the Fire Chief who reports to the City Manager, along with the fire management team consisting of five (5) Fire Captains, one (1) Fire Inspector, one (1) Administrative Assistant, five (5) Firefighter Engineers, and 15 Fire Fighters, collectively providing administrative and operational control of the department. The CFD serves the community in advanced life support patient care, emergency medical transportation, structural fire suppression, wildland fire suppression, vehicle extrication, water rescue, hazardous materials first response, and fire and injury prevention education (City of Calexico, 2020). CFD firefighters are also trained in Hazardous Materials Operational level. Many of its members are on the Imperial Valley Hazardous Emergency Assistance Team (IV HEAT) and ready to handle hazardous conditions anywhere in Imperial County on a moments notice (City of Calexico, 2020).

The CFD paramedic program uses a combination of first responder paramedic engine and truck companies operating from two fire stations, and one Advanced Life Support (ALS) Medic Unit. Medic units reach the patient in nine (9) minutes or less 97% of the time, and

paramedic first responder units have arrived on scene in eight minutes or less 98% of the time (Calexico 2020). The Calexico Fire Department does not currently utilize a formally adopted firefighter-to-population ratio as a planning standard. Staffing levels are established through the City's budget process, operational needs, collective bargaining agreements, and service demand. Current daily staffing is 10 personnel per shift to maintain two engine companies and two ambulances in service (Calexico Fire Chief 2026). The Department participates in California's statewide mutual aid system and maintains automatic aid and mutual aid agreements with neighboring fire agencies throughout Imperial County. Current response times vary based on call type, traffic conditions, railroad crossings, and incident location. Based on recent operational data from the Fire Chief:

- EMS incidents: approximately five to nine minutes average travel time.
- Fire suppression incidents: approximately five to nine minutes average travel time.

The Department responds to approximately 5,000 incidents annually, with emergency medical services representing the majority of calls for service (Calexico Fire Chief 2026).

As shown in Figure 4.12-1, Fire and Police Stations, the City currently has two existing fire stations; one (1) at 415 East 4th Street (Fire Station #1 and Headquarters), and one (1) at 900 W Grant Street (Fire Station #2). The stations are strategically located on opposite sides of the Union Pacific Railroad corridor to provide efficient emergency response coverage throughout the City.

4.12.1.2 Police Protection Services

Police protection in the City is provided by the City of Calexico Police Department (CPD). The City's police station is located at 420 E. 5th Street. This location is a joint-use fire/police station to serve proposed new development in that area and maintain quick response time. The City also has an International Traffic Meter/Controller Office at 100 Paulin Ave. Two substations at Nosotros and near Meadows Avenue north of SR-98 are no longer in use, though there is discussion internally in the police department to reestablish those locations once manpower increases to prior levels. See Figure 4.12-1: Fire and Police Stations, for the location of the Calexico police facilities.

The performance standard noted in the 2018 Service Area Plan for law enforcement personnel is 1.5 officers per 1,000 population with a target ratio of two per 1,000 in population, four dispatchers per shift (two shifts per day), one support staff member per six sworn officers, and one detective per five uniformed officers. As of June 2026, there are 20 sworn officers, five sergeants, and one lieutenant budgeted for the department, for a staffing ratio of approximately .53 to 1 (Calexico Chief of Police 2026).

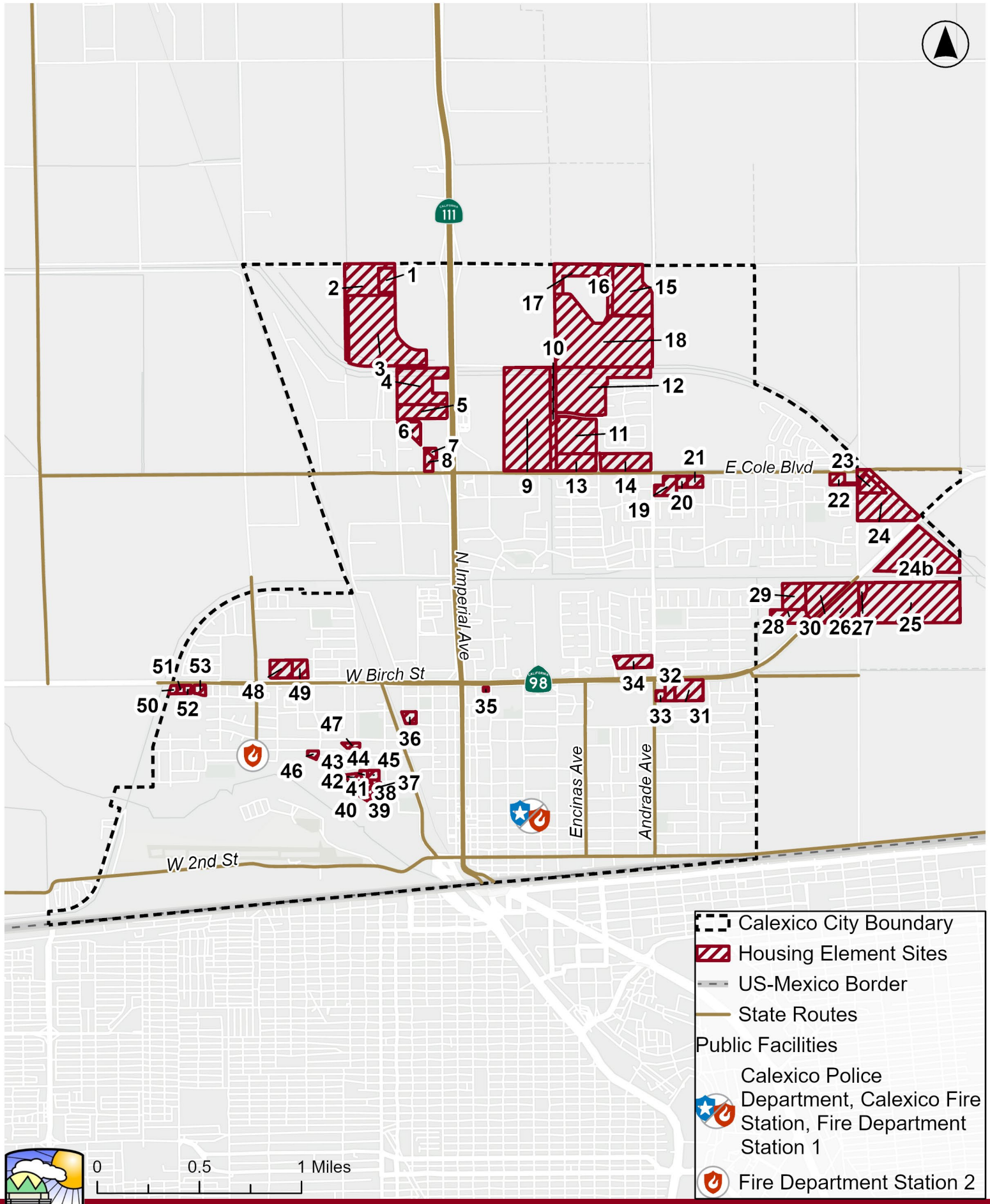


Figure 4.12-1:
Fire and Police Stations

4.12.1.3 School Facilities

The City of Calexico is served by the Calexico Unified School District (CUSD). As shown in Figure 4.12-2, Schools, Parks, Libraries, and Open Space Facilities, CUSD currently has seven elementary schools, one high school, one continuation high school, two junior high schools, and one adult education center. There are approximately 7,792 students in the CUSD system supported by 490 certificated fulltime teachers, 209 fulltime classified teachers, 202 part-time classified teachers, 205 certificated temps, and 356 classified temps (Calexico 2018). The schools operated by CUSD are:

<u>High Schools (Grades 9-12)</u>

- Aurora Continuation High School (Grades 9-12)

<u>Junior High Schools (Grades 7-8)</u>

- Enrique Camarena Junior High School
- William Moreno Junior High School

<u>Elementary Schools (Grades TK-6)</u>

- Blanche Charles Elementary
- Cesar Chavez Elementary
- Dool Elementary School
- Jefferson Elementary
- Rockwood Elementary
- Kennedy Gardens Elementary
- Mains Elementary

<u>Adult Education</u>

- Robert Morales Adult Basis Educational School

The CUSD has historically coped with tremendous growth and has had issues of overcrowding. Other schools in Imperial Valley have changed to the multi-track year-round schedule to help mitigate overcrowding from burgeoning student populations. CUSD, however, has not been able to change from a traditional school year due to the significant number of students from families of migrant farm workers. Approximately 23% of all students enrolled in CUSD schools are from migrant families. The CUSD has determined that switching to a year-round school year would prevent these students from attending school (CUSD Assistant Superintendent 2026).

According to the 2025 School Facility Needs Analysis and Justification Report, the CUSD's student capacity, as calculated pursuant to Education Code Section 17071.10 is:

- 3,574 students in grades K-6,
- 1,202 students in grades 7-8; and
- 2,242 students in grades 9-12.

The K-6 grade group in the CUSD has 888 seats of existing excess capacity; However, the CUSD has no existing excess capacity available for students that would be generated from new residential development in the 7-8 and 9-12 grade groups.

To address these issues, the CUSD's Board of Education authorized the levying of Development Impact Fees on new residential construction from between $12.46 and $24.92 per square foot (CUSD 2025). Additionally, the City is in the process of completing the Calexico High School Expansion and Modernization Project (SCH #2022080061). The project involves comprehensive modernization and rehabilitation of much of the Calexico High School campus, including demolition, renovation, and new construction. Improvements include a new administration building, two STEAM classroom buildings, a new multipurpose room/cafeteria, replacement of several existing structures, and campus-wide infrastructure upgrades. The City has completed infrastructure, and is projected to complete final increments by December of 2028 (CUSD Assistant Superintendent 2026).

In addition to the schools provided by the CUSD, there are three private academic institutions within the City. These include Our Lady of Guadalupe Academy (K-8), Vincent Memorial Catholic High School (9-12), and Calexico Mission School (K-12). Also located in Calexico is the Imperial Valley branch of San Diego State University (SDSU). The campus serves over 850 upper-division students. The eight-acre campus is located near Calexico Civic Center and includes an expanded library, Rodney Auditorium, and John Steppling Art Gallery to provide academic and cultural resources for the entire community (SDSU, 2026). In addition to the SDSU offerings, the District has developed a vocational arts high school program with a robust CTE program (CUSD Assistant Superintendent 2026).

4.12.1.4 Library Facilities

The Camarena Memorial Library currently provides primary library services to the residents of the City of Calexico. There is an additional branch 2,164 square-foot library located at the historic Carnegie Library Building as a technology center, which operates with limited hours, Monday through Thursday from 3:00-7:00p.m. Per the 2018 Calexico SAP, the performance standards for library facilities in the City of Calexico would be 0.55 square feet of library space per resident. Additionally, library facilities should be available within two miles or ten minutes driving time, whichever is less, and staffing should include one librarian and two clerical staff per 6,000 residents. A performance factor for library inventory was also established at three items per resident including books, computers, tapes, CD's, periodicals, and similar resources.

The 12,000-square foot Camarena Memorial Library has one Library Manager, one Library Technician, one Executive Assistant, and one Library Assistant II. The library has between 5-10 volunteers that dedicate time to assist students and residents. The Library Board recognizes the need to expand the main library to 24,000 square feet and eventually build another branch library. Included in the main library expansion would be facilities for arts/crafts, more computers, additional staff, and small conference rooms (City of Calexico, 2015), but due to current funding there are no plans to begin this expansion.

4.12.1.5 Open Space and Recreational Facilities

The City of Calexico Recreation Department offers a variety of open space and recreational services for the residents of Calexico. As seen in Table 4.12-1: Existing Green Area and Park Acreage and Facilities, the City has 24 green areas, parks, and facilities maintained by the City of Calexico Public Works Department, totaling more than 85 acres (Calexico Public Works Manager, 2026). Figure 4.12-2: Schools, Parks, Libraries, and Open Space Facilities, shows the locations of existing parks within the City. Table 4.12-1 lists the existing parks, their individual acreage, and selected facilities. Parks are typically categorized by their size and service area. The City has numerous smaller parks that, according to the City park classification (found in the City's Parks and Recreation Element), would not qualify as either Neighborhood or Community Parks.

Table 4.12-1: Existing Green Area and Park Acreage and Facilities

Green Area, Public Park, or Recreational Facility	Amenities	Acreage
Border Friendship Park	Benches, Water Fountain, Adjacent to Police Department Sub-station	1.18
Miguel Cortez Park	Basketball Courts, Benches, Restrooms, Playground, Shade Structure	0.47
Carmen Estrada Basin		3.07
Rockwood Plaza Park	Playground Equipment, Restrooms, Gazebo, Shade Structure, Picnic Tables, Benches	2.56
Rio Vista Park (Emilia)	Playground Equipment, Drinking Fountain, Shade Structure, Picnic Benches	0.87
Nosotros Park and Baseball Field	Basketball Courts, Shaded Benches, Restrooms, Walk/Run Trail, Baseball Field, Playground Equipment, Parking Lot, Skateboard Area, Lighting	5.90

Green Area, Public Park, or Recreational Facility	Amenities	Acreage
Rodriguez Park and Field	Tennis Courts, Basketball Courts, Bleachers, Shade Structure, Picnic Tables, Benches, Playground Equipment	3.80
Heber Park	Children's Playground, Swings, Restrooms	2.35
Crummentt Park	Enclosed Areas, Restrooms, Benches, Stage Area	5.71
Daniel Gutierrez Field	Restrooms, Stage Area, Bleachers, Soccer Goalies	4.85
Las Casitas Park	Soccer Field, Baseball Field, Barbeque	6.0
Kennedy Gardens Park (Espinoza)	Tot Lot, Baseball Field, Basketball Court	4.5
John F. Kennedy Park	Basketball Court, Shaded Structure	2.53
Kennedy Gardens Green Area (Banagas Court)		0.53
Kennedy Gardens Green Area (R. Kennedy St.)	Lighting	0.77
Victoria Park West Basin		4.29
Victoria Park North Basin		2.82
Victoria Park East Basin		6.15
Villa del Oro Basin		1.55
Victoria Estates Park		1.41
Meadows Estates South Basin		0.92
Meadows Estates North Basin		2.06
Joel Risien Park		6
Adrian Cordova Memorial Park	Walk/Run Trail, Playground, Benches, Parking lot, Lighting	15

Green Area, Public Park, or Recreational Facility	Amenities	Acreage
	Total	**85.29**

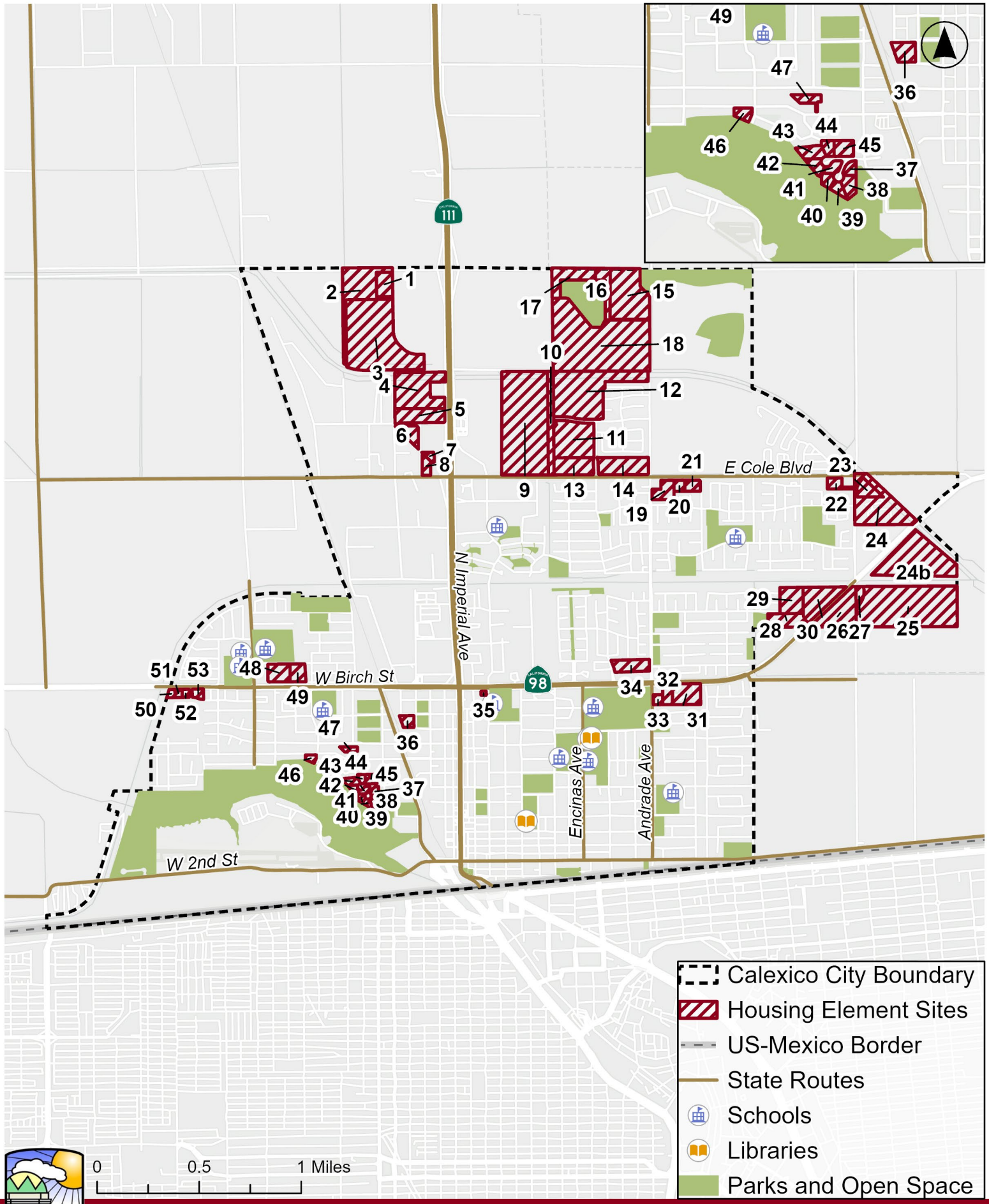


Figure 4.12-2:
Schools, Parks, Libraries, and Open Space Facilities

4.12.2 Regulatory Framework

4.12.2.1 Federal

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire-and life-safety regulations, with topics addressing Fire-Department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

4.12.2.2 State

Fire Regulations

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. In general, commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

The California Wildland-Urban Interface Code (CWUIC) is a new, consolidated set of wildfire safety regulations adopted into Title 24, Part 7 of the California Building Standards Code. It became effective January 1, 2026, and is based on the 2024 International Wildland-Urban Interface Code (IWUIC) with California-specific amendments. The CWUIC is organized into the following chapters with distinct purposes:

- Chapter 1: Scope and Administration
- Chapter 2: Definitions
- Chapter 3: Wildland-Urban Interface Areas
- Chapter 4: WUI Area Requirements
- Chapter 5: Special Building Construction Regulations

- Chapter 6: Fire Protection Requirements
- Chapter 7: Referenced Standards

As described in Section 4.15, Wildfire, of this DEIR, the City contains interface, intermix, and influence WUI-designated areas along the New River where houses meet or intermingle with undeveloped wildland vegetation.

California Health and Safety Code

California fire regulations are established under Sections 13000 et seq. of the California Health and Safety Code and include requirements related to building standards, fire protection and notification systems, fire safety devices such as smoke alarms and extinguishers, as well as standards applicable to high-rise structures and childcare facilities. These regulations are enforced by the State Fire Marshal for State-owned and State-occupied facilities and institutions throughout California. The regulations also address fire department access, fire hydrant placement, automatic sprinkler and fire alarm systems, hazardous materials handling and storage, fire and explosion prevention measures, protections for emergency responders, and safety requirements for industrial operations.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include but are not limited to guidelines on the handling of highly combustible materials, firehouse sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Police Protection

Emergency Response/Evacuation Plans

California Government Code Section 8607(a) requires the Governor's Office of Emergency Services (Cal OES) to establish and maintain the Standardized Emergency Management System (SEMS), which provides a framework for coordinating emergency response activities during disasters and large-scale emergencies. SEMS is designed to facilitate effective management of multi-agency and multijurisdictional incidents throughout California and includes five organizational levels that may be activated as needed: Field Response, Local Government, Operational Area, Regional, and State.

Use of SEMS is required for local governments to qualify for reimbursement of eligible response-related personnel costs through State disaster assistance programs. Calexico has adopted an Emergency Operations Plan that is consistent with SEMS requirements.

Schools

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Senate Bill 50

Proposition 1A, also known as the Kindergarten–University Public Education Facilities Bond Act of 1998 or Senate Bill (SB) 50, was approved by California voters in November 1998. The measure authorized $6.7 billion in general obligation bonds to support K–12 public school facilities and established the School Facility Program, which provides state funding assistance for school construction and modernization projects. SB 50 substantially revised California's school facilities financing framework and the process for mitigating school impacts associated with new development. Under SB 50, school districts are authorized to levy developer fees pursuant to Education Code Section 17620 and Government Code Sections 65995 through 65998 and 66000 through 66008. The legislation established three tiers of developer fees:

- Level 1 fees, commonly referred to as "Stirling Fees," are the statutory fees authorized under Education Code Section 17620.
- Level 2 fees, authorized under Government Code Section 65995.5, permit school districts to impose higher residential development fees if specified conditions are met. Implementation of Level 2 fees requires preparation of a School Facility Needs Analysis pursuant to Government Code Section 65995.6.
- Level 3 fees, identified in Government Code Section 65995.7, may be imposed if the State determines that funding for school facilities is no longer available.

CUSD collects developer impact fees (DIFs) to offset the costs associated with providing additional school facilities for increased student enrollment generated by new housing developments within the CUSD boundaries.

Open Space and Recreation

Public Park Preservation Act

The primary mechanism for the protection and preservation of parkland is the California Public Park Preservation Act. Under the California Public Resources Code, cities and counties are prohibited from converting or acquiring property used as a public park for non-park purposes unless replacement land, monetary compensation, or a combination of both is provided. This requirement is intended to ensure there is no net loss of parkland or park facilities.

Quimby Act

First enacted in 1975, the Quimby Act (California Government Code Section 66477) authorizes cities and counties to adopt ordinances requiring residential developers to dedicate land, grant conservation easements, or pay in-lieu fees for park and recreation purposes. The legislation enables local agencies to require developers of residential subdivisions to contribute parkland or recreational facility fees as a condition of development approval. The dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision. Funds collected under the Quimby Act are restricted to acquisition and development of parkland and may not be used for ongoing operations or maintenance of park facilities.

The Act was significantly amended in 1982 to clarify permissible uses of Quimby funds, establish standards and formulas based on acreage-to-population ratios, and reinforce that required dedications and fees must be reasonably related to the impacts of the proposed development. At present, the City's park impact fees are $1,517 per single-family residential unit and $1,303 per multi-family residential unit (City of Calexico 2025). These fees are imposed in lieu of parkland dedication under the City's development impact fee program.

4.12.2.3 Regional

Imperial County Emergency Operations Plan

The Imperial County Emergency Operations Plan (EOP) establishes the framework of the Imperial County Operational Area's emergency organization consisting of the County, cities, towns, special districts, schools, volunteer and private sector organizations, as well as State and Federal agencies and conforms to current State and Federal guidelines for emergency plans. This EOP also defines functions, assigns responsibilities, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements utilizing the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS) standards.

The Imperial County EOP is an extension of the State of California Emergency Plan and the National Response Plan and is intended to be reviewed and exercised periodically and revised as necessary to meet changing conditions. An update was drafted in 2025 and has yet to be finalized.

Imperial County Multi-Jurisdictional Hazard Mitigation Plan

The Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) was adopted January 2021 and describes past and current hazard mitigation activities and outlines goals, strategies, and actions for reducing future disaster losses. The Jurisdictions included in the MHMP include Imperial County; the cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial, and Westmorland; and Imperial Irrigation District; and the Imperial County Office of Education. The MHMP includes objectives and policies related to Calexico public services and facilities:

- **Objective 3:** Land use pattern and population of Calexico should be consistent with the capabilities of existing and planned public services and facilities.
- **Policy 3a:** The number of dwelling units in the City shall be limited to those which can be adequately served by public services and/or facilities.
- **Policy 3b:** The City shall maintain current information concerning the capacities of the public services and facilities it provides.
- **Policy 3c:** The City shall encourage other public service agencies to keep their capacity information current.
- **Policy 3d:** Land uses and development review applications that are inconsistent with the capability of any public service agency to provide cost-effective service shall not be approved.

  Policy 3e: Major extensions of services or utilities to facilitate land use change shall not be approved without a thorough review of all social, economic, and environmental factors with appropriate mitigation measures implemented, if necessary.
- **Policy 3f:** The City's Service Area Plan shall be updated every 5 years.
- **Objective 20**: The City shall assure that funding for infrastructure and services needed to provide for the health, welfare, and safety of the residents of Calexico is available.
- **Policy 20a:** The City shall require developer fees that shall be reviewed every 5 years to assure adequate funds are being collected to service new development.
- **Policy 20b:** The City should encourage the use of Community Facilities Districts to assist with funding and place the burden of infrastructure and services needed for new development on the residents and businesses located therein.

4.12.2.4 Local

Calexico General Plan

The current adopted Calexico General Plan, adopted in 2007, includes policies that aim to reduce impacts to public services, schools, and open space. Policies applicable to the project include:

Housing Element

- **Policy H-2.2**: Encourage development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
- **Policy H-1.5**: Preserve unique natural features in the community, including hillsides, canyons, and other environmental amenities, with minimal disruption.

2007 Public Facilities and Services Element

- **Policy 1.a**: Establish funding mechanisms, including development impact fees and exactions, to fund facilities required by new development.
- **Policy 1.b:** Create assessment districts where appropriate to fund public improvements.
- **Policy 1.c**: Utilize bonds and financing programs for long-term capital improvements.
- **Policy 1.d**: Develop joint-use agreements with schools and other agencies for shared facilities.
- **Policy 2.a:** Approve development only where sewer facilities are available or can be expanded.
- **Policy 2.b:** Monitor sewer infrastructure to maintain service quality and regulatory compliance.
- **Policy 2.c:** Require sewer service availability prior to approval of development.
- **Policy 3.a:** Expand police staffing and facilities commensurate with population growth.
- **Policy 3.b:** Require development to contribute proportional fees for police protection services.

2007 Parks and Recreation Element

The 2007 adopted General Plan establishes a park standard per residents served that may be achieved by a variety of park classifications:

- **Pocket Park:** Pocket parks are less than 2 acres in size and are not necessarily intended to be used for active recreational activities beyond children' s play equipment.

- **Neighborhood Park:** Neighborhood parks shall be 5- 10 acres in size. Neighborhood parks serve residents within a 1/2 to 1- mile radius and the characteristics thereof shall be examined to determine the proper facilities for each park. Wherever possible, neighborhood parks should be located at the center of the residential area that they serve.
- **Community Park:** Community parks shall be between 20 and 50 acres in size and serve a population of about 20,000. This park type serves several neighborhoods within a 2-mile radius.

2007 Parks and Recreation Element

- **Policy 1.a**: Develop a parks and recreation system responsive to seniors, children, families, active adults, teenagers, and persons with disabilities.
- **Policy 1.b:** Provide equal levels of park service to all areas of the community.
- **Policy 1.c**: Periodically review and update park and recreation facilities/programs as community needs change.
- **Policy 1.d**: Allow private parks and recreational facilities to satisfy development park requirements through HOAs or CFDs.
- **Policy 1.e:** Develop a minimum 20-acre community park and additional community parks to serve population growth.
- **Policy 2.a:** Develop a community park of at least 20 acres with active and passive recreational facilities.
- **Policy 2.b:** Locate community parks near the center of the City where feasible.
- **Policy 2.c:** Locate community parks near public transportation where feasible.
- **Policy 2.d:** Incorporate public art and historical themes into park design where appropriate.
- **Policy 2.e:** Design parks to minimize impacts from lighting, parking, and outdoor facilities on adjacent uses.
- **Policy 2.f**: Allow limited retention basin acreage to count toward parkland requirements.
- **Policy 2.g:** Require landscaped retention basins.
- **Policy 2.h:** Require drought-tolerant landscaping, accessible design, drainage, and encourage bicycle/multi-use trails.
- **Policy 3.a:** Continue implementation of Quimby Act parkland dedication and in-lieu fee requirements.
- **Policy 3.b:** Acquire new parkland through grants, capital budgeting, and financing mechanisms.

- **Policy 3.c:** Explore expansion of parks/open space through public lands and infrastructure corridors.
- **Policy 3.d**: Work with community organizations and businesses to support park acquisition and maintenance.
- **Policy 4.a:** Implement Joint Use Agreements with the Calexico Unified School District.
- **Policy 4.b:** Locate parks adjacent to schools where feasible.
- **Policy 4.c:** Coordinate recreational activities with nearby communities.
- **Policy 4.d:** Coordinate with Imperial Irrigation District regarding trails/open space along canals.
- **Policy 5.a:** Maintain, renovate, and replace recreational facilities regularly.
- **Policy 5.b:** Develop a Capital Improvement Program for park repair and replacement.

2007 Conservation and Open Space Element

- **Policy 1.c:** Encourage coordinated planning to preserve open space corridors and recreational resources.
- **Policy 2.a:** Encourage efficient use of land and infrastructure.
- **Policy 2.d:** Encourage preservation of open space and recreational opportunities associated with canal and drainage corridors.
- **Policy 3.a:** Encourage development of recreational open space accessible to City residents.
- **Policy 3.b:** Coordinate open space planning with parks and recreational facilities.
- **Policy 3.c:** Promote trail systems and connections between recreational resources and residential neighborhoods.

2007 Land Use Element

- **Policy 1.e:** Schools and parks should be located in proximity to the residents served. Final school locations must be reviewed and approved by the local school district in accordance with State law.
- **Policy 3.a:** Development shall be phased with the provision of adequate infrastructure and public services.
- **Policy 3.b:** Public facilities should be located and designed to efficiently serve existing and future development.
- **Policy 3.c**: Encourage development patterns that reduce infrastructure and service costs.

Municipal Code

Title 3 Chapter 3.34 Parkland Dedication Fees

Calexico Municipal Code Title 3, Chapter 3.34 (Parkland Dedication Fees) implements the provisions of California Government Code Section 66477 (the Quimby Act) and requires residential subdivisions to contribute toward the provision of park and recreational facilities needed to serve future residents. As a condition of subdivision approval, the City may require the dedication of land, payment of an in-lieu fee, or a combination of both for park and recreational purposes. The City Council determines the appropriate dedication or fee requirement during the subdivision review process based on factors such as the General Plan, the location and suitability of land within the subdivision, and the community's recreational needs. The ordinance establishes a parkland dedication standard of 0.0125 acre per residential unit and requires that fees be based on the fair market value of the land and associated improvements that would otherwise be dedicated. Land and fee revenues collected under the chapter must be used solely for the acquisition, development, or rehabilitation of park and recreational facilities that serve the residents of the new development.

On May 6, 2026 Calexico City Council adopted a resolution approving a temporary DIF waiver and parking requirement reduction for development within the historic core of Calexico effective through June 30, 2029. The area affected is bounded by SR-98 to the north, Encinas Avenue to the east, the International Border to the south, and the railroad to the west. This includes Housing Element site number 35, a 0.31 acre Commercial Highway designated site south of SR-98.

Title 13 – Public Services

Title 13 of the Municipal Code governs public services, including water service, sewer systems, and police services, and establishes standards intended to ensure that public infrastructure and services are available concurrent with development. The Municipal Code includes provisions related to utility connections, service requirements, infrastructure maintenance responsibilities, and development-related service coordination. These regulations function as part of the City's existing regulatory framework governing future development and infrastructure expansion.

Title 16 – Subdivisions

Title 16 of the Calexico Municipal Code establishes regulations governing subdivision design, mapping, improvements, and infrastructure requirements associated with new development within the City. The subdivision regulations are intended to ensure that land divisions occur in an orderly manner consistent with the General Plan, applicable infrastructure standards, and the California Subdivision Map Act. These provisions form part of the City's existing regulatory framework for managing growth and coordinating development with the provision of public facilities and services.

Title 16 further provides mechanisms for implementing development-related infrastructure financing and improvement requirements, including provisions related to drainage, transportation, public facilities, and development improvements. These regulations help ensure that future residential and nonresidential development contributes to the infrastructure and service systems necessary to accommodate growth anticipated under the General Plan and Housing Element Update.

Calexico Unified School District Resolution No. 09-12-25

The CUSD has adopted a DIF program pursuant to SB 50 that levies statutory school impact fees per residential building square footage. These fees are regularly updated and the current adopted fees based on Resolution No. 09-12-25 are as follows (CUSD 2025):

- Level 2 Residential: $12.46 / square foot of assessable space
- Level 3 Residential: $24.92 / square foot of assessable space

2018 City of Calexico Service Area Plan (SAP)

This City of Calexico Service Area Plan prepared by the Holt Group in 2018 addresses how public facilities and services will be provided to the City of Calexico and the Annexation Areas over the course of the 20-year planning period. This document provides the performance standards, adequacy of existing and planned facilities, mitigation services, and financing for each public facility in the City. However, more recent data pertaining to performance standards and facility assessments has been received by the individual City departments and districts.

4.12.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts to public services and recreation would be significant if the proposed project would:

1) Threshold 1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    a. Fire protection
    b. Police protection
    c. Schools
    d. Parks
    e. Other public facilities

2) Threshold 2: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility occur or be accelerated.
3) Threshold 3: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.12.4 Methodology

The public services and recreation analysis focuses on existing conditions for fire, police, schools, libraries, and recreational facilities, as well as the potential effects of project buildout on these services. Input was also obtained from relevant service providers regarding current operations and anticipated impacts from future development facilitated by the project.

The impact analysis is based on an evaluation of the project's potential to generate demand for additional public services and recreational facilities. Information was derived from secondary sources and applicable regional and local planning documents, including the City's General Plan, fire protection regulations, and emergency response and evacuation plans.

4.12.5 Issue 1a: Fire Service

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered fire emergency facilities in order to maintain service ratios, response times, or other performance objectives, and the construction of which could cause significant environmental impacts?

4.12.5.1 Impact Analysis

Future residential development associated with implementation of the Housing Element would accommodate projected population growth within the City; however, such growth could incrementally increase demand for fire protection and emergency response services such that additional staff, equipment, or facilities could be needed to meet this goal.

Per consultation with the Fire Chief in 2026, the CFD does not currently utilize a formally adopted firefighter-to-population ratio and instead implements and maintains a standard of 10 personnel per shift to maintain two engine companies and two ambulances in service. Although future development facilitated by the project could contribute incrementally to increased service demand over time, future development projects within the City would be reviewed by the CFD for compliance with the applicable fire prevention policies and provisions of the General Plan, Calexico Municipal Code, Imperial County MHMP, California Building Code, California Health and Safety Code, and other existing regulatory

requirements referenced in Section 4.12.2, Regulatory Framework. The CFD review includes requirements related to fire flow, hydrant spacing, emergency access, evacuation, and CWUIC hazard mitigation. Since the project would promote infill development by introducing new development or replacing older buildings with newer structures built to current Fire Code standards that would be more fire resilient, therefore, reducing the potential impacts of fires in WUI Intermix Areas within the City. Compliance with these standards ensures that project-level fire risks are addressed and helps maintain acceptable service levels over time.

Additionally, future development would aid the CFD in maintaining their service standard by paying DIFs which fund future fire protection facilities, vehicles, and equipment. As discussed under Section 4.12.2.4, the Calexico City Council adopted a resolution approving a temporary DIF waiver and parking requirement reduction for development within the historic core of Calexico effective through June 30, 2029. The area affected covers Housing Element site 35, a 0.31-acre Commercial Highway designated site south of SR-98. As such, if housing site 35 were to redevelop as residential before June 30, 2029, the City would waive such fees and requirements and the City would seek alternative funding sources for public services to make up the DIF not collected.

Increased service demand may require new or expanded fire stations; construction of such facilities is typically small-scale and would likely occur in urbanized areas on previously disturbed land, thereby reducing the likelihood of substantial adverse physical impacts. Any future construction or expansion of fire protection facilities, if determined necessary, would undergo separate environmental review pursuant to CEQA at the time specific improvements are proposed. Therefore, impacts related to the need for new or physically altered fire protection facilities would be less than significant at this programmatic level of review.

4.12.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.12.5.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.12.6 Issue 1b: Police Protection

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain service ratios, response times, or other performance objectives, 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?

4.12.6.1 Impact Analysis

Future residential development associated with implementation of the Housing Element would accommodate projected population growth within the City; however, such growth could incrementally increase demand for police protection and law enforcement services to maintain the service ratio of approximately 2 officers per 1,000 residents per the 2024 Calexico General Plan Annual Progress Report (Calexico Annual Report, 2024). As discussed in Section 4.11, Population and Housing, the project would provide the opportunity for the development of up to 5,794 residential units, which could conservatively accommodate approximately 22,133 residents.[1] However, it should be noted that some of the future residential units allowed under the Housing Element would also serve existing residents in addition to potentially new residents. Residential development from the proposed project would occur incrementally, with full buildout anticipated by 2050. To serve the additional population, the CPD may need additional facilities, and approximately 45 officers (based on the service ratio), and equipment to maintain adequate levels of police protection and response performance. This number of additional police offers could warrant the construction of a new facility. If and when future police facilities or expansions are determined necessary, such improvements would be evaluated separately and subject to environmental review pursuant to CEQA at the time specific projects are proposed.

New development projects, whether discretionary or ministerial, would be reviewed by the City and relevant public safety agencies to ensure compliance with applicable policies and provisions of the General Plan, Calexico Municipal Code, Imperial County MHMP, and other applicable law enforcement requirements and standards requiring adequate emergency access, circulation, and public safety considerations are incorporated into project design and operation. These regulating documents include actions requiring periodic strategic planning and service reporting that collectively provide a framework to ensure police services are routinely evaluated and addressed as development occurs. Further, operations of future development would be required to comply with law enforcement requirements and standards. New development would also be subject to DIF requirements which contribute to the CPD's ability to maintain appropriate service levels.[2] Compliance with regulations and

[1] The estimated 22,133 resident population is conservatively based on the 2024 Census Calexico average household size of 3.82 persons per household. This is a conservative estimate because the 2024 Connect SoCal Demographics and Growth Forecast assumes a persons per household ratio of 2.63 in 2050 for Calexico.

[2] The Calexico City Council adopted a temporary DIF waiver for development within the historic core of Calexico effective through June 30, 2029. The area affected covers Housing Element site 35 designated site

standards in effect at that time would address potential environmental impacts associated with the construction and operation of such facilities. Therefore, at this programmatic level of review, impacts related to the need for new or physically altered police protection facilities would be less than significant.

4.12.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.12.6.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.12.7 Issue 1c: Schools

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain service ratios, response times, or other performance objectives, 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?

4.12.7.1 Impact Analysis

The City is served by the CUSD, through 11 campuses. As noted in Section 4.12.1.3, above, the CUSD currently has 888 seats of existing excess capacity for the K-6 grade group; however, has no existing excess capacity available for students that would be generated from new residential development in the 7-8 and 9-12 grade groups(CUSD Assistant Superintendent 2026). To address these capacity issues, the CUSD's Board of Education, authorized the levying of DIFs on new residential construction from between $12.46 and $24.92 per square foot. Future development associated with the proposed project could incrementally increase student enrollment and demand for school facilities and educational services within the CUSD territory. As future development occurs, the City and CUSD will evaluate school operations and services to maintain acceptable service ratios and remain within the capacity of CUSD schools.

Further, future development projects, whether discretionary or ministerial, would be required to comply with applicable State law, including payment of the Calexico School District impact fees pursuant to SB 50. These fees are intended to assist local school districts in addressing increased facility demands associated with new residential development. Payment of impact fees as adopted by CUSD per SB 50 would reduce impacts to an acceptable level. Additionally, coordination between the City, developers, and affected

housing site 35 were to redevelop as residential before June 30, 2029, the City would waive such fees and would seek alternative funding sources for public services to make up the DIF not collected.

school districts would occur, as appropriate, during implementation of future development projects to evaluate school service needs associated with future growth.

The proposed project would allow the City to accommodate projected growth but would not generate demand for housing or attract population growth beyond that anticipated in regional forecasts. Any future construction or expansion of school facilities, if determined necessary by the applicable school districts, would undergo separate environmental review pursuant to CEQA at the time specific improvements are proposed. Compliance with regulations, CUSD DIFs, and standards in effect at that time would address potential environmental impacts associated with the construction and operation of new school facilities. Therefore, at this programmatic level of review, impacts related to the need for new or physically altered school facilities would be less than significant.

4.12.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.12.7.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.12.8 Issue 1e: Other Public Facilities - Library Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities in order to maintain service ratios, response times, or other performance objectives, 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?

4.12.8.1 Impact Analysis

Future development associated with implementation of the proposed project could incrementally increase demand for library facilities, programs, and related community services. Although additional residential development facilitated by the project could contribute to increased demand for library services incrementally over time, the City would also continue coordinating with regional and local service providers and community organizations, as appropriate, to maintain adequate public services for residents as future growth occurs.

Future development projects, whether discretionary or ministerial, would be required to comply with applicable City regulations, DIF requirements[3], and General Plan policies related to the provision of public facilities and services. Applicable DIFs and ongoing

[3] See footnote 2 regarding the temporary DIF waiver for development within the historic core of Calexico.

municipal planning efforts would help support maintenance and improvement of public facilities serving future residents, including library services. Compliance with applicable regulations and standards in effect at that time would address potential environmental impacts associated with the construction and operation of such facilities.

Any future construction or expansion of library facilities, if determined necessary, would undergo separate environmental review pursuant to CEQA at the time specific improvements are proposed. Therefore, at this programmatic level of review, impacts related to the need for new or physically altered library facilities would be less than significant.

4.12.8.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.12.8.3 Significance After Mitigation

Impacts would be **less than significan**t. No mitigation is required.

4.12.9 Issue 1d, 2, and 3: Parks and Recreation Facilities

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities in order to maintain service ratios, response times, or other performance objectives, 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?

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?

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

4.12.9.1 Impact Analysis

The Calexico Municipal Code, Chapter 3.34 Parkland Dedication Fees, establishes a parkland dedication standard of 0.0125 acre per residential unit. The General Plan establishes the park types that may be used to meet this standard.

Future development accommodated under the proposed rezones would support anticipated population growth within the City. Implementation of the project could incrementally increase demand for parks and recreational facilities associated with future residential growth. Future development projects would be required to comply the General Plan's park standard and City's DIFs established in the Calexico Municipal Code and

regulated by the Quimby Act. Payment of DIFs[4] would support the City's ability to maintain and expand park and recreational facilities consistent with applicable General Plan goals, objectives, and policies, as outlined above in Section 4.12.2, Regulatory Framework.

Implementation of future housing development facilitated by the project would not directly require the construction or expansion of parks or recreational facilities at this programmatic level of review. To the extent future park or recreational facility improvements are proposed, such improvements would undergo separate project-level environmental review, as required, and would be subject to the regulations, standards, and CEQA requirements in effect at that time. Therefore, impacts related to the provision of or need for new or physically altered parks and recreational facilities would be less than significant.

4.12.9.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.12.9.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

[4] See footnote 2 regarding the temporary DIF waiver for development within the historic core of Calexico.

4.13 Transportation

This section analyzes potential impacts to hazards and hazardous materials that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). Specifically, this section addresses conformance and any potential conflicts with applicable plans, ordinances, and policies, consistency with CEEQA guidelines, potential hazards due to roadway designs or incompatible traffic uses, and emergency access.

This section is based on the findings of the Transportation Study prepared for the proposed project, included as Appendix I of this DEIR. The Transportation Study (Appendix I) consists of a CEQA-required Vehicle Miles Traveled (VMT) Analysis, and a non-CEQA Local Transportation Analysis (LTA) for General Plan consistency.

4.13.1 Existing Conditions

The City of Calexico transportation system consists of a network of State highways, arterial and collector roadways, local streets, bicycle and pedestrian facilities, and public transit services. The roadway network provides local circulation within the City while also serving regional travel throughout Imperial County and international travel associated with the Calexico East and West Ports of Entry. The City's circulation system is generally organized around two principal State highways, State Route (SR) 111 and SR 98, which provide north-south and east-west connectivity, respectively.

4.13.1.1 Public Transit

Public transit within the City of Calexico is provided by the Imperial County Transportation Commission (ICTC) through the Imperial Valley Transit (IVT) system. IVT provides fixed-route bus service throughout Imperial County, connecting Calexico with neighboring communities including El Centro, Imperial, Brawley, Holtville, and the Imperial Valley College (IVC) campus.

There are four existing IVT transit routes that serve Calexico. These routes primarily provide north-south regional connections between Calexico and El Centro, Brawley, and Imperial Valley College, while also providing local east-west service through portions of the City. Existing routes serving Calexico include:

- Imperial Valley Transit Routes 1N/1S
    - Weekday peak: approximately 35-70-minute headway

    - Weekend off-peak: approximately 90-minute headway
- Imperial Valley Transit Routes 21N/21S
    - Weekday peak: approximately 15-55-minute headway
    - Weekend off-peak: no service
- Imperial Valley Transit Routes 31D/32D
    - Weekday peak: approximately 70-75-minute headway
    - Saturday off-peak: approximately 100-minute headway
    - Sunday: no service
- Imperial Valley Transit Express–Calexico
    - Weekday peak: approximately 60-minute headway
    - Weekend off-peak: no service

As shown in Figure 4.13-1: IVT Transit Network, many of the housing sites identified in the proposed project would increase density within proximity to existing transit routes and bus stops.

4.13.1.2 Rail

No passenger rail service is currently available within the City of Calexico or Imperial County. Freight rail service is provided by the Baja California Railroad (BJRR), which operates on the former San Diego and Arizona Eastern Railway corridor. The rail line extends through Calexico and facilitates the movement of agricultural products, manufactured goods, and cross-border freight between Imperial County, San Diego County, and Baja California, Mexico. Public transit in the City is provided solely through the Imperial Valley Transit bus network and complementary demand-response services.

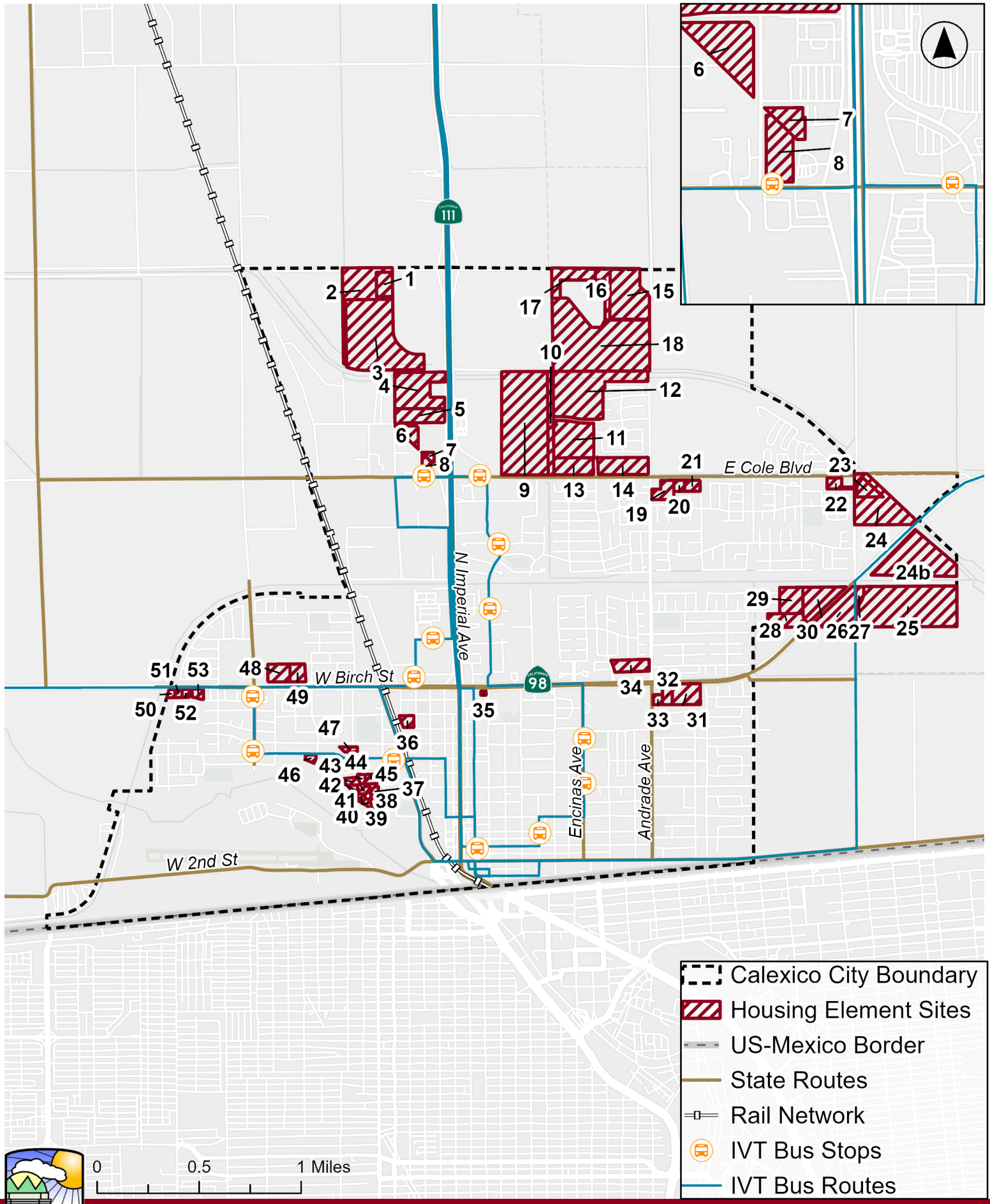


Figure 4.13-1:
IVT Transit Network

4.13.1.3 Roadway Network

The City maintains a hierarchical roadway network consisting of State highways, arterial streets, collector roadways, and local residential streets. The roadway system provides access to residential neighborhoods, employment centers, commercial districts, schools, public facilities, and the international ports of entry. The City's Circulation Element identifies roadway classifications and establishes roadway design standards intended to accommodate projected population and employment growth while maintaining safe and efficient traffic operations.

State Route (SR) 111 (Imperial Avenue)

State Route (SR) 111 is classified as a State Highway in the City's primary transportation corridor and is maintained by Caltrans. Within Calexico, SR 111 generally follows Imperial Avenue before continuing north through Imperial County toward El Centro, Brawley, and the Coachella Valley. The SR 111 corridor provides regional connectivity for residents, commercial traffic, and agricultural freight while also serving international travel associated with the Calexico West Port of Entry. SR 111 functions as a principal north-south arterial within the City and provides access to residential neighborhoods, commercial development, schools, civic uses, and the international border crossing. Imperial Avenue experiences some of the highest traffic volumes within the City due to its regional function and concentration of commercial and governmental uses

SR 98 (also known as Birch Street)

SR 98 is classified as a State Highway and is the City's principal east-west State highway and generally follows SR 98 through the central portion of Calexico before extending west toward Interstate 8. SR 98 serves regional travel between Calexico and western Imperial County while providing access to commercial and industrial areas, residential neighborhoods, and agricultural lands west of the City. SR 98 is also designated as a truck route and accommodates freight movement associated with cross-border commerce and regional agricultural activities. Because SR 98 is part of the State Highway System, roadway improvements are coordinated with Caltrans.

Cole Boulevard

Cole Boulevard is a major east-west arterial located in the northern portion of the City. The roadway provides access to existing residential neighborhoods, commercial development, schools, and future growth areas identified in the General Plan. Cole Boulevard also serves as an important connection between SR 111 and western portions of the City and is identified as a key corridor for future multimodal improvements. Cole Boulevard is classified as a Collector on the Imperial County Circulation Element but serves as a major commercial and industrial arterial for the City to relieve traffic pressures off Birch Street.

2nd Street/Anza Road

2nd Street, which becomes Anza Road east and west of the City, is one of the major east/west cross-town arterials near the southern edge of the City, serving residential neighborhoods and commercial development within the central portion of Calexico. The roadway provides local circulation between residential areas and the downtown commercial district while distributing traffic to the City's arterial street network.

Encinas Ave

Encinas Avenue functions primarily as a collector roadway serving residential neighborhoods in western Calexico. The roadway provides neighborhood access and connections to nearby arterial roadways, including SR 98 and Cole Boulevard, and accommodates local traffic traveling between residential areas and schools, parks, and commercial services.

Andrade Avenue

Andrade Avenue is a north-south arterial roadway located in eastern Calexico. The roadway provides access to residential neighborhoods, industrial development, and commercial uses while connecting SR 98 with the international border area. Andrade Avenue also serves as an important north-south alternative to Imperial Avenue for local traffic circulation.

Jasper Road

Jasper Road is a north-south collector roadway located along the western portion of Calexico. The roadway provides access to residential neighborhoods, agricultural lands, and undeveloped areas while connecting to SR 111 north of the urban core. Jasper Road serves as an important local circulation route for western portions of the City and provides access to future development areas identified in the General Plan.

Cesar Chavez Boulevard

Cesar Chavez Boulevard is an unclassed roadway according to the Circulation Element but functionally serves as a north-south arterial roadway serving central Calexico. The corridor provides access to residential neighborhoods, schools, parks, commercial development, and community facilities while connecting SR 98) with southern portions of the City. The roadway functions as an important north-south alternative to Imperial Avenue for local traffic circulation and neighborhood connectivity, and serves as the primary, or an additional, entrance roadway to/from Mexico through the Calexico West Border Station.

Bowker Road

Bowker Road is a north-south collector roadway located along the western edge of the City. The roadway connects SR 98 with Cole Boulevard and provides access to residential neighborhoods, agricultural lands, and planned growth areas. Bowker Road serves as an

important connection between western Calexico and the regional roadway network and has been identified in the Transportation Study as a corridor where future traffic control improvements may be warranted to accommodate projected growth.

Grant Street

Grant Street is an east-west collector roadway serving the central and southern portions of Calexico. The roadway provides local access to residential neighborhoods, schools, commercial uses, and public facilities while connecting to both Imperial Avenue (SR 111) and Cesar Chavez Boulevard. Grant Street distributes neighborhood traffic to the City's arterial roadway system and supports local circulation within established residential areas.

Kloke Road

Kloke Road is a north-south collector roadway located in western Calexico. The roadway provides access to residential neighborhoods and agricultural properties while connecting SR 98 with local streets serving western portions of the City. Kloke Road primarily accommodates local traffic and provides an important connection between residential areas and the City's east-west arterial network.

Meadows Road

Meadows Road is a north-south collector roadway that intersects Cole Boulevard in northern Calexico. The roadway provides access to existing residential neighborhoods, commercial development, and future growth areas identified in the General Plan. Meadows Road supports local circulation and serves as a connection between developing northern portions of the City and the surrounding arterial roadway network.

4.13.1.4 Pedestrian and Bicycle Network

The City of Calexico supports active transportation through an existing network of sidewalks, crosswalks, bicycle facilities, and multi-use routes. Sidewalks are generally provided throughout the developed portions of the City, particularly within residential neighborhoods, downtown, commercial corridors, and near schools and public facilities, although sidewalk connectivity varies in older and developing areas.

Existing bicycle facilities within the City include Class III bicycle routes and shared roadway segments identified in the City's Circulation Element and Imperial County Regional Active Transportation Plan. As shown in Figure 4.13-2: Bicycle and Pedestrian Network, Class III bike routes are currently provided in one or both directions of the following roadways in the vicinity of the proposed housing sites in the City of Calexico:

- Eastbound Cole Boulevard from M. L. King Street to Clinton Avenue, adjacent to existing development and housing sites 19-21

- SR-98 in both directions from V. V. Williams Avenue to Rockwood Avenue
- Cesar Chavez Boulevard in both directions from SR-98 to 2nd Street

The Imperial County Regional Active Transportation Plan identifies additional bicycle network improvements throughout Calexico to improve connectivity and expand multimodal travel opportunities. The Transportation Study (RICK, 2026) identified opportunities for additional pedestrian and bicycle infrastructure associated with future development, including construction of new sidewalks along project frontages and approximately 1.69 miles of additional bikeway facilities along portions of Cole Boulevard and SR 98, consistent with regional active transportation planning efforts.

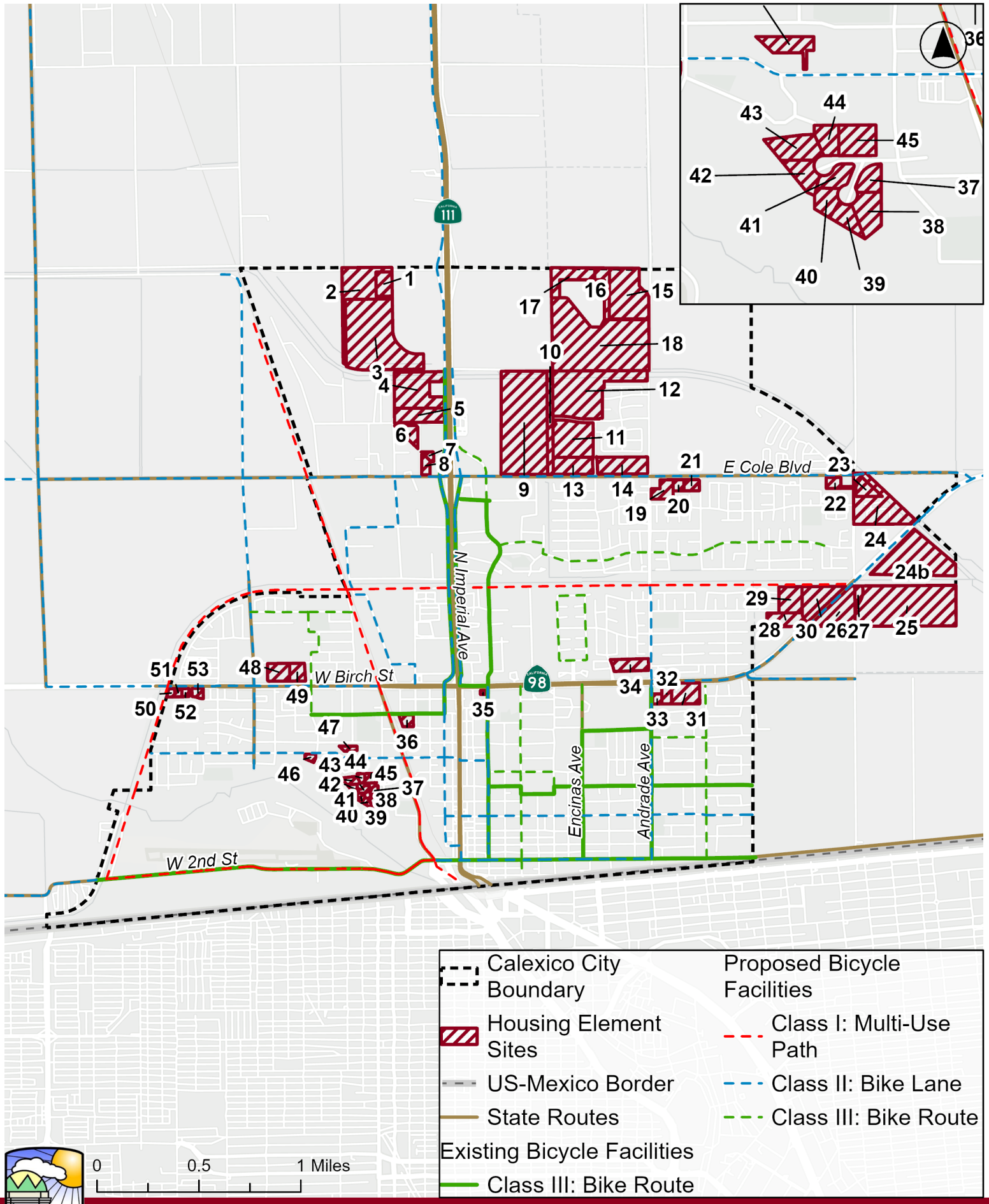


Figure 4.13-2:
Bicycle and Pedestrian Network

4.13.2 Regulatory Framework

4.13.2.1 Federal

2010 Highway Capacity Manual (HCM)

The Highway Capacity Manual (HCM), published by the Transportation Research Board (TRB), provides nationally recognized methodologies for evaluating the operational performance of transportation facilities, including freeways, highways, signalized and unsignalized intersections, roundabouts, transit systems, bicycle facilities, and pedestrian infrastructure. The HCM establishes procedures for evaluating roadway capacity, travel delay, level of service (LOS), and multimodal operations under existing and future conditions. Although California has transitioned to vehicle miles traveled (VMT) as the primary CEQA transportation metric pursuant to Senate Bill (SB) 743, HCM methodologies continue to be widely used by local agencies to evaluate intersection operations and roadway performance for planning and General Plan consistency analyses.

United States Department of Transportation

The United States Department of Transportation (USDOT) establishes national transportation policies and administers federal transportation funding programs intended to improve the safety, efficiency, and sustainability of the nation's transportation system. Through agencies such as the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), the USDOT provides funding and technical guidance for highway, bridge, bicycle, pedestrian, and public transit improvements. Federal transportation programs support State and local agencies in maintaining transportation infrastructure, enhancing multimodal mobility, improving freight movement, and reducing transportation-related environmental impacts.

4.13.2.2 State

Caltrans Authority over the State Highway System

The California Department of Transportation (Caltrans) is responsible for planning, designing, constructing, operating, and maintaining the State Highway System pursuant to the California Streets and Highways Code. Within the City of Calexico, Caltrans has jurisdiction over State Route (SR) 111 and SR 98, which serve as the City's principal regional transportation corridors. Projects that affect the State Highway System, including roadway improvements, new access points, or modifications to intersections, require review and approval by Caltrans to ensure consistency with State design standards, operational requirements, and safety objectives.

Caltrans District 11 Active Transportation Plan (2022)

Caltrans District 11, which includes Imperial County, prepared the District 11 Active Transportation Plan (ATP) to identify infrastructure improvements that enhance walking, bicycling, and other active transportation modes throughout the region. The ATP identifies existing barriers to active transportation and recommends projects that improve safety, accessibility, connectivity, and mobility for pedestrians and bicyclists, and encourages jurisdictions to use the Complete Streets Toolbox to support any future development. The plan identifies location-based needs organized among three priority tiers, with Tier 1 representing the highest priority improvements and Tier 3 representing the lowest. According to the ATP, Tier 1 and Tier 2 improvements are needed for the entirety of the SR 111 and SR 98 segments located within City limits.

Senate Bill 99 Assembly Bill 747

Senate Bill (SB) 99 and Assembly Bill (AB) 747 are 2019 California legislative mandates designed to protect communities by requiring local jurisdictions to systematically identify, map, and plan for safe emergency evacuation during disasters like wildfires. The legislation requires cities and counties, upon the next update of their Safety Element, to identify residential developments located in hazard areas that do not have at least two emergency evacuation routes. The legislation also requires local agencies to identify evacuation route capacity constraints and develop evacuation planning strategies across multiple emergency scenarios.

Senate Bill 375 Sustainable Communities and Climate Protection Act

Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act of 2008, integrates transportation planning, land use planning, and housing development to reduce greenhouse gas emissions from passenger vehicles. SB 375 requires metropolitan planning organizations, including the Southern California Association of Governments (SCAG), to prepare Sustainable Communities Strategies (SCS) that demonstrate how regional growth forecasts can be accommodated while achieving greenhouse gas reduction targets established by the California Air Resources Board (CARB). The legislation promotes compact development patterns, infill housing, mixed-use development, and multimodal transportation systems that reduce reliance on automobile travel.

Complete Streets Act (2008)

The California Complete Streets Act (2008) requires cities and counties, upon the next update of their Circulation Element, to incorporate Complete Streets policies into the circulation element of their general plans when those elements are revised. Complete Streets policies are intended to accommodate the safe and convenient travel of all roadway users, including pedestrians, bicyclists, motorists, transit riders, children, older adults, and

individuals with disabilities. The Act encourages transportation planning that integrates multimodal facilities into roadway design and supports healthy, accessible, and sustainable communities.

State Transportation Improvement Program

The State Transportation Improvement Program (STIP) is California's five-year capital improvement program for transportation infrastructure, administered by the California Transportation Commission (CTC) in coordination with Caltrans and regional transportation agencies. The STIP allocates State transportation funding for capacity improvements, highway rehabilitation, bridge projects, transit investments, bicycle and pedestrian facilities, and other transportation improvements throughout California.

Senate Bill 99 and Assembly Bill 101

Passed in 2013, Senate Bill (SB) 99 established the Office of Planning and Research's Active Transportation Program (ATP) Technical Assistance Program to support disadvantaged communities in developing active transportation infrastructure projects. The legislation expanded State resources available to local agencies for planning bicycle, pedestrian, and Safe Routes to School projects by providing technical assistance during project development and grant application processes. The ATP aims to increase the proportion of trips accomplished by walking and biking, increase the safety and mobility of non-motorized users, advance regional efforts to achieve greenhouse gas reduction goals, enhance public health, and provide a broad spectrum of projects to benefit everyone in the region. The ATP is administered jointly by the California Transportation Commission and Caltrans.

Senate Bill 743

Senate Bill (SB) 743 fundamentally changed the evaluation of transportation impacts under the California Environmental Quality Act (CEQA). Effective July 1, 2020, transportation impacts under CEQA are evaluated using vehicle miles traveled (VMT) rather than automobile delay or level of service (LOS). The legislation was intended to better align transportation analysis with Statewide goals to reduce greenhouse gas emissions, encourage infill development, promote multimodal transportation, and reduce dependence on single-occupancy vehicles. Pursuant to Section 15064.3 of the CEQA Guidelines, VMT is the primary metric used to evaluate transportation impacts under CEQA, while LOS analyses may continue to be prepared by local agencies for planning purposes and General Plan consistency evaluations. Since VMT is the primary metric to analyze environmental impacts, projects containing LOS exceeding the relevant general plan standards should not be analyzed under or considered to conflict with CEQA (*The Highway 68 Coalition v. County of Monterey* (2017) 14 Cal.App.5th 883.

California Public Resource Code (PRC)

California Public Resources Code (PRC) Section 4290 establishes minimum fire safety standards for the design and construction of developments within State Responsibility Areas (SRAs). The regulations require that subdivisions, commercial developments, and other projects provide adequate emergency access, roadway design, signage, water supply, and perimeter wildfire protection measures to facilitate emergency response and reduce wildfire risk. These standards are intended to ensure that new development provides safe ingress and egress for residents and emergency responders while minimizing the potential for wildfire hazards.

4.13.2.3 Regional

Southern California Association of Governments (SCAG) 2024 Connect SoCal

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy) for Federal transportation conformity purposes only. Connect SoCal outlines more than $750 billion in transportation system investments through 2050.

SCAG created the Connect SoCal Transportation Safety Resource Hub to assist local jurisdictions in advancing transportation safety and meeting annual safety targets. It serves as a centralized source for SCAG's safety programs, data, reports, and resources. The hub includes:

- Regional transportation safety goals and targets summary
- Overview of SCAG's existing transportation safety conditions
- Interactive map of SCAG's Regional High Injury Network (HIN) with downloadable data
- Resources for local jurisdictions to develop their own HIN
- Opportunities to engage in SCAG's ongoing safety efforts
- Access to data, tools, funding, and resources from SCAG and other organizations.

Imperial County Transit Commission Regional Active Transportation Plan

The Imperial County Transportation Commission (ICTC) Regional Active Transportation Plan (February 2022) recommends 138 pedestrian improvements at intersections throughout the City of Calexico, including ADA curb ramps and high-visibility crosswalks.

The Active Transportation Plan (ATP) recommends 7.3 miles of Class I multi-use paths, 15.6 miles of Class II bike lanes, and 2.2 miles of Class III bike routes throughout the City of Calexico. The recommended bicycle facility improvements include the following in the vicinity of the proposed housing sites:

- Cole Boulevard: 3.3 miles of Class II bike lanes
- SR-98: 4.6 miles of Class II bike lanes and 1.3 miles of Class I multi-use path
- Scaroni Avenue: 3.0 miles of Class II bike lanes
- Rockwood Avenue: 2.2 miles of Class II bike lanes
- Grant Street: 1.7 miles of Class II bike lanes

ICTC Regional Long-Range Transportation Plan

The Imperial County Transportation Commission (ICTC) is the regional transportation planning agency responsible for coordinating transportation planning and programming throughout Imperial County. ICTC prepares and periodically updates the Regional Transportation Plan (RTP), which establishes a long-range vision for the county's transportation system by identifying planned improvements to highways, local roadways, public transit, freight facilities, bicycle infrastructure, and pedestrian networks. The RTP promotes a safe, efficient, and multimodal transportation system that supports regional mobility, economic development, environmental sustainability, and compliance with State and federal transportation policies. Transportation improvements within the City of Calexico are coordinated with the goals and projects identified in the ICTC RTP.

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

As the metropolitan planning organization (MPO) for Southern California, the Southern California Association of Governments (SCAG) prepares the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to guide long-range regional growth, transportation investment, and greenhouse gas reduction efforts. The RTP/SCS integrates transportation planning with land use and housing strategies to accommodate projected population and employment growth while reducing vehicle miles traveled (VMT), improving mobility, and promoting sustainable development patterns. The City of Calexico is within the SCAG planning region, and the Housing Element is intended to support regional housing goals consistent with the RTP/SCS.

4.13.2.4 Local

Calexico General Plan

2004 Land Use Element

The Land Use Element establishes the City's vision for future growth and development by designating the location, distribution, and intensity of residential, commercial, industrial, public, and open space land uses. This element promotes coordinated land use and transportation planning by encouraging development patterns that support efficient roadway operations, provide access to employment and community services, and facilitate walking, bicycling, and public transit.

2004 Circulation Element

The Circulation Element establishes policies and standards for the planning, operation, and maintenance of Calexico's transportation system, including roadways, intersections, bicycle facilities, pedestrian infrastructure, public transit, freight movement, and emergency access routes. The element identifies the City's functional roadway classification system, establishes roadway design standards, and recommends transportation improvements necessary to accommodate future growth while maintaining safe and efficient circulation. The proposed project has been evaluated for consistency with the Circulation Element through the accompanying Transportation Study, which assesses future roadway operations and vehicle miles traveled (VMT).

2004 Safety Element

The Safety Element identifies policies and programs intended to protect the community from natural and human-caused hazards, including those related to transportation and emergency response. The element addresses emergency access and evacuation planning, roadway safety, hazardous materials transportation, and coordination among emergency service providers. Transportation infrastructure identified in the Safety Element plays an important role in supporting emergency evacuation, maintaining emergency response capabilities, and ensuring safe access throughout the City during hazard events.

4.13.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts related to transportation would be significant if implementation of the project would:

1) Threshold 1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
2) Threshold 2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
3) Threshold 3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4) Threshold 4: Result in inadequate emergency access.

4.13.4 Methodology

The analysis of this section is based on the Transportation Study (Appendix I) which consists of a CEQA-required Vehicle Miles Traveled (VMT) Analysis, and a non-CEQA Local Transportation Analysis (LTA) for General Plan consistency. The Transportation Study used a travel demand model forecasting process to estimate the future resident VMT per capita

within the region as well as within the City. Three study scenarios were evaluated, including Base Year and two future year alternatives, as follows:

1) Existing Conditions (Base Year 2019) – establishes the baseline VMT within the project study area defined in Appendix I.
2) Horizon Year with Existing Adopted General Plan Buildout Conditions (No Project) – represents buildout of the City's currently adopted General Plan Land Use and Housing Elements.
3) Proposed Project at Horizon Year 2050 – represents buildout of the City and the housing sites which override the sites identified in the City's currently adopted General Plan.

4.13.5 Issue 1: Circulation System

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

4.13.5.1 Impact Analysis

The proposed housing sites are distributed throughout Calexico, with many located along existing arterial and collector roadways that are served by sidewalks, bicycle facilities, and Imperial Valley Transit (IVT) bus routes. As future residential development occurs, there would be increased demand for roadway improvements, pedestrian facilities, bicycle infrastructure, transit access, and other multimodal transportation enhancements to support new residents and improve connectivity throughout the City. However, the proposed project would not prescribe any modifications to the City's roadway network or implement specific design features or specifications for new project-level development, roadways, or other transportation facilities. There are no specific development projects proposed at this time for consideration and any future projects will have to go through the City's review and approval process. As discussed below, the proposed project would generally complement and be consistent with the regional and City transportation goals, policies, and programs:

SCAG Connect SoCal 2024

The Southern California Association of Governments (SCAG) Connect SoCal 2024 (Connect SoCal) seeks to reduce regional vehicle miles traveled (VMT), traffic congestion, and greenhouse gas (GHG) emissions by directing future growth to existing urbanized areas and integrating land use and transportation planning. Connect SoCal also emphasizes enhancing the existing transportation system and expanding multimodal transportation options, including transit, bicycle, and pedestrian facilities. The proposed project is consistent with these objectives because it identifies housing sites within Calexico's existing urbanized area, where development can be served by the existing transportation network

and has access to transit and active transportation facilities. By accommodating future residential growth within the City's established urban area rather than encouraging outward expansion, implementation of the proposed project would support the regional land use and transportation strategy outlined in Connect SoCal.

Calexico General Plan

Land Use Element

The adopted Land use Element promotes coordinated land use and transportation planning by encouraging development patterns that support efficient roadway operations, provide access to employment and community services, and facilitate walking, bicycling, and public transit. The proposed project is intended to accommodate future residential development in a manner consistent with the City's overall land use framework.

Circulation Element

The City's adopted Circulation Element (2007) establishes policies regarding roadway operations, multimodal circulation, bicycle facilities, pedestrian facilities, and transit. Although the adopted Circulation Element includes LOS policies, CEQA Guidelines section 15064.3 provides that vehicle delay is not a measure of transportation impacts under CEQA.

The Transportation Study prepared for the proposed project fulfills the requirement to determine vehicle delays and future intersection improvement needs in the City of Calexico with implementation of the proposed project (See Appendix I). Although CEQA transportation impacts are evaluated based on vehicle miles traveled (VMT) pursuant to Senate Bill 743, the Transportation Study also included a Local Transportation Analysis (LTA) to evaluate intersection operations for General Plan consistency. The LTA analyzed 14 key intersections under existing conditions, Horizon Year 2050 General Plan buildout conditions, and Horizon Year 2050 conditions with implementation of the proposed project. While the project’s CEQA transportation impact analysis is based on VMT, the Non-CEQA Local Transportation Analysis (LTA) included in Appendix I identified potential operational deficiencies at three intersections under buildout conditions with the proposed project: Cole Boulevard/Bowker Road, SR 98/David Navarro Avenue, and SR 98/Bowker Road. The Transportation Study recommends intersection improvements, including signalization, turn lanes, and updated turn phasing, to improve operations to LOS D or better to maintain consistency with the City’s Circulation Element and adopted traffic standards.

ICTC Regional Active Transportation Plan

The Imperial County Transportation Commission (ICTC) Regional Active Transportation Plan (ATP) provides a countywide strategy for improving walking and bicycling through the development of a safe, connected, and accessible active transportation network. Within

Calexico, the ATP identifies existing gaps in pedestrian and bicycle infrastructure and recommends improvements along several key corridors, including Cole Boulevard, SR 98, and connections to schools, parks, employment centers, and the Calexico Ports of Entry. As future residential development occurs under the proposed project, project-level improvements such as sidewalks, bicycle facilities, pedestrian crossings, and ADA-compliant infrastructure would support implementation of the ATP and improve multimodal connectivity throughout the City. New development as part of the proposed project would be required to comply with the ICTC ATP and therefore would not conflict with any provisions of the ICTC ATP.

ICTC Regional Long-Range Transportation Plan

The ICTC Regional Long-Range Transportation Plan (LRTP) establishes the long-term vision for transportation investment throughout Imperial County and identifies projects intended to improve regional mobility, safety, system reliability, freight movement, and multimodal accessibility. The LRTP recognizes Calexico as an important regional transportation hub because of its international ports of entry and major highway connections, including State Routes 98 and 111. The Housing Element supports the LRTP by directing future residential growth into areas served by existing transportation infrastructure, thereby promoting efficient use of public facilities and reducing the need for major roadway expansions into undeveloped areas

City of Calexico Bike Master Plan Update (2018)

The City of Calexico Bicycle Master Plan Update establishes a framework for expanding and improving the City's bicycle transportation network through the addition of bicycle lanes, shared-use routes, wayfinding, and supporting infrastructure. The Bicycle Master Plan identifies opportunities to improve connectivity between residential neighborhoods, schools, parks, commercial areas, transit services, and the international border crossings while increasing safety for bicyclists of all ages and abilities. Many of the housing sites are located adjacent to existing or planned bicycle corridors identified in the Bicycle Master Plan. Future residential development associated with the proposed project could incorporate bicycle improvements along project frontages and contribute to implementation of the City's long-term bicycle network.

Imperial County Safe Routes to School Regional Master Plan (2016)

The Imperial County Safe Routes to School Regional Master Plan identifies infrastructure and program improvements intended to increase the safety of students walking and bicycling to schools throughout Imperial County, including schools located within Calexico. Recommended improvements include new sidewalks, pedestrian crossings, bicycle facilities, traffic calming measures, and accessibility enhancements near schools. Several

housing sites are located within established residential neighborhoods that provide access to existing schools. As these sites are developed, future projects may include frontage improvements that enhance pedestrian and bicycle connectivity consistent with the goals of the Safe Routes to School program.

Calexico Transit Needs Assessment Study (2017)

The Calexico Transit Needs Assessment Study evaluates existing public transit service within the City and identifies opportunities to improve transit accessibility, connectivity, and service efficiency. The study recognizes that Calexico's transit system serves residents traveling to employment centers, schools, medical facilities, shopping areas, and the international ports of entry, and recommends improving pedestrian access to transit stops, expanding transit coverage where feasible, and strengthening connections between neighborhoods and regional transit services. The Housing Element would accommodate future residential growth in areas generally served by existing Imperial Valley Transit routes, thereby supporting continued use of public transit and increasing opportunities for multimodal travel.

Calexico Border Intermodal Transportation Center Feasibility Study (2014)

The Calexico Border Intermodal Transportation Center Feasibility Study evaluates opportunities to improve mobility near the international border by integrating public transit, pedestrian facilities, bicycle infrastructure, intercity transportation, and cross-border travel into a coordinated transportation hub. Because Calexico serves as one of California's busiest international border communities, efficient multimodal transportation is critical to supporting residents, workers, and visitors. While the proposed project does not include development of an intermodal facility, concentrating future housing within the existing urbanized area supports the study's objective of improving access to transit and reducing reliance on single-occupancy vehicle travel.

Conclusion

Future development as a result of the proposed project would occur in urbanized areas with access to existing and planned transportation infrastructure and would not preclude planned roadway, bicycle, pedestrian, or transit improvements identified in the Circulation Element or other regional and local transportation plans.

4.13.5.2 Mitigation Framework

The proposed project would not conflict any program, plan, ordinance, or policy addressing the circulation system. Therefore, no mitigation is required and impacts would be less than significant.

4.13.5.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.13.6 Issue 2: Vehicle Miles Traveled

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

4.13.6.1 Impact Analysis

Pursuant to Senate Bill (SB) 743 and Section 15064.3 of the CEQA Guidelines, transportation impacts are evaluated using vehicle miles traveled (VMT) rather than automobile delay or level of service (LOS). The proposed project would amend the General Plan Land Use Element and Zoning Ordinance to facilitate future residential development on the identified housing sites throughout the City. Although the proposed project does not approve specific development projects, implementation of future residential development would generate additional vehicle trips and increase VMT within the City's transportation network.

The Transportation Study (Appendix I) was prepared to evaluate the project's VMT impacts in accordance with the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018). The Transportation Study utilized baseline VMT per capita resident data from the Southern California Association of Governments (SCAG) Housing, Environmental, and Land Use Parcel (HELPR) Tool and compared each Housing Opportunity Site to the applicable CEQA significance threshold of 15 percent below the Imperial County regional average VMT per capita resident. The Imperial County regional average VMT per capita resident is 12.0, resulting in a significance threshold of 10.2 VMT per capita resident.

The Transportation Study first screened all 53 housing sites using the OPR-recommended screening criteria. Twenty-five sites screened out as having a less-than-significant transportation impact because they either met the map-based screening threshold or qualified under the screening methodology. However, 28 housing sites exceeded the screening threshold and therefore required detailed VMT analysis.

The detailed VMT analysis determined that the following housing sites would exceed the CEQA significance threshold: sites 1 through 18, 25 through 30, and 50 through 53. For these sites, projected VMT per capita resident ranged from approximately 91.7 percent to 208.3 percent of the Imperial County regional average, exceeding the CEQA significance threshold under both existing and Horizon Year 2050 conditions. As a result, implementation of the proposed project would result in a potentially significant transportation impact related to VMT.

4.13.6.2 Mitigation Framework

MM TRA-1: VMT Reduction Measures. Future development of housing sites identified in the Housing Element shall incorporate feasible VMT-reducing project features during project design, as determined appropriate by the City during discretionary review. Consistent with the Transportation Study, VMT reduction measures may include, but are not limited to:

- CAPCOA Measure T-1 (Increase Residential Density): Development at residential densities that support reduced vehicle travel and increase opportunities for walking, bicycling, and transit use. The percent VMT reduction associated with this measure is capped at 30%;
- CAPCOA Measure T-18 (Provide Pedestrian Network Improvement): Construction of new sidewalks and pedestrian connections that improve access between residential neighborhoods, schools, parks, commercial centers, and transit stops. The percent VMT reduction associated with this measure is capped at 3.4%;
- CAPCOA Measure T-20 (Expand Bikeway Network): Installation or expansion of bicycle facilities consistent with the City of Calexico Bicycle Master Plan Update, the ICTC Regional Active Transportation Plan, and applicable City standards. The percent VMT reduction associated with this measure is capped at 0.5%;
- Improvements that enhance connectivity to existing Imperial Valley Transit (IVT) routes and transit stops;
- Additional transportation demand management (TDM) measures or VMT reduction strategies determined appropriate during project-level environmental review.

Consistent with the Transportation Study, these project features are intended to reduce VMT through increased residential density, improved pedestrian connectivity, and expansion of the City's bicycle network. The estimated effectiveness of these measures was evaluated using methodologies contained in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2021).

4.13.6.3 Significance After Mitigation

With implementation of **MM TRA-1**, the following13 housing sites received VMT reductions that meet the minimum VMT to mitigate the impacts to level below significance:

- Site 5
- Site 6
- Site 7
- Site 8
- Site 13
- Site 14
- Site 26
- Site 27
- Site 28
- Site 50

- Site 51
- Site 52
- Site 53

However, because the VMT reduction measures can only partially reduce the vehicle miles traveled, 16 remaining housing sites still do not meet the minimum VMT needed to mitigate the impacts to levels below significance. The following 16 housing sites have been mitigated to the greatest extent possible:

- Site 1
- Site 2
- Site 3
- Site 4
- Site 9
- Site 10
- Site 11
- Site 12
- Site 15
- Site 16
- Site 17
- Site 18
- Site 24b
- Site 25
- Site 29
- Site 30

As demonstrated in the Transportation Study, these housing sites have been mitigated to the greatest extent feasible through incorporation of feasible VMT reduction measures. Additional reductions sufficient to achieve the CEQA significance threshold are not feasible because of the sites' existing regional travel characteristics and baseline VMT conditions. Consequently, transportation impacts associated with VMT as a result of implementation of these housing sites would remain significant and unavoidable, and implementation of the proposed project would require adoption of a Statement of Overriding Considerations.

Therefore, impacts associated with VMT would remain **significant and unavoidable impacts.**

4.13.7 Issue 3: Hazards Due to a Design Feature

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

4.13.7.1 Impact Analysis

The proposed project is a policy-level planning document that identifies housing sites to accommodate potential future residential development. The proposed project does not directly include the construction or geometric redesign of roadways or intersections. Although the accompanying Transportation Study recommends future operational improvements at select intersections, these recommendations do not involve roadway

geometric design features that could create transportation hazards, such as sharp curves, inadequate sight distance, substandard lane widths, or other unsafe roadway alignments

The Transportation Study prepared for the proposed project identified several future operational improvements at three intersections, including installation of traffic signals, additional turn lanes, and protected/permitted left-turn phasing at the Cole Boulevard/Bowker Road, SR-98/David Navarro Avenue, and SR-98/Bowker Road intersections to maintain acceptable Levels of Service (LOS) under Horizon Year 2050 conditions. These recommended improvements are intended to enhance traffic operations and accommodate future travel demand. The improvements do not involve modifications to hazardous roadway geometric features such as sharp curves, inadequate sight distance, substandard lane widths, or other unsafe roadway alignments, nor do they identify or create dangerous intersections. Rather, the recommended signalization and turn-lane improvements are anticipated to improve traffic control, operational efficiency, and overall intersection safety.

The Transportation Study also evaluated the need for traffic signals based on applicable California Manual on Uniform Traffic Control Devices (CA-MUTCD) signal warrants and determined that the evaluated intersections would satisfy one or more warrants under future conditions, supporting signal installation as an appropriate operational improvement. The Transportation Study did not identify existing or proposed roadway geometric deficiencies that would result in hazardous conditions associated with implementation of the proposed project.

The proposed project does not grant entitlements for any specific project or future development and would not prescribe any modifications to the City's roadway network or implement specific design features or specifications for new project-level development, roadways, or other transportation facilities. Future development would be required to comply with City engineering design standards, the Calexico Municipal Code, applicable Caltrans requirements for improvements affecting State Routes 98 and 111, and any applicable project-specific review conducted during subsequent discretionary approvals.

Therefore, the proposed project would not introduce new safety hazards at intersections or along roadway segments, nor introduce any incompatible transportation uses, and impacts would be less than significant.

4.13.7.2 Mitigation Framework

The proposed project would not substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, no mitigation is required, and impacts would be less than significant.

4.13.7.3 Significance After Mitigation

Impacts would be **less than significant**.

4.13.8 Issue 4: Emergency Access

Would the project result in inadequate emergency access?

4.13.8.1 Impact Analysis

The proposed project does not include the construction of individual residential projects, modification of existing roadways, changes to emergency response routes, or the installation of new transportation facilities that would obstruct or reduce access along existing emergency routes. Construction activities facilitated by the proposed project could temporarily impair emergency access points used for emergency access vehicles, however, standard construction procedures would address these conditions and would require provision of alternative emergency vehicle access points. Any construction on State highway systems would be required to create a temporary traffic control plan that adheres to the standards set forth in the California Manual of Uniform Traffic Control Devices (Caltrans 2021). Future development forecasted under the proposed project that would involve work in the public right-of-way would be required to ensure appropriate traffic control, pursuant to the requirements of an encroachment permit through the Engineering Division of the City's Public Works Department.

The City's Safety Element identifies major regional transportation facilities, including Interstate 8, SR 111, and SR 98, as important transportation corridors that support regional access and emergency response. Future development accommodated by the proposed project would occur within the City's existing urbanized area and would be required to maintain consistency with applicable emergency access requirements and adopted safety standards. All identified housing sites contain access to the existing public roadway network.

Any future development would be required to comply with applicable City standards and regulations related to emergency access, including applicable provisions of the California Fire Code, California Building Code, City engineering standards, and review by the City's emergency service providers. Subsequent project-level approvals would require evaluation of site access, roadway widths, circulation patterns, driveway design, and emergency vehicle access to ensure that adequate access is provided for fire, police, emergency medical services, and other emergency responders. In addition, future residential development would be reviewed by City staff to ensure consistency with all applicable City and State design standards, including standards for project access points, location, and design, sight lines, roadway modifications, provisions for bicycle, pedestrian, and transit

transportation connections, and emergency access. Therefore, the proposed project would not result in increased hazards due to inadequate emergency access. As a result, these impacts would be less than significant.

4.13.8.2 Mitigation Framework

The proposed project would not directly result in inadequate emergency access; therefore no mitigation is required and impacts would be less than significant.

4.13.8.3 Significance After Mitigation

Impacts would be **less than significant**.

4.14 Utilities and Service Systems

This section analyzes potential impacts to Utilities and Service Systems that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The Housing Element supports 53 sites that may be developed by-right or through discretionary actions. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I).

More specifically, this section evaluates the potential environmental effects of the proposed project related to water supply, wastewater generation, stormwater drainage, solid waste, electricity, natural gas, and telecommunication facilities. This analysis was informed by consultation with City Public Works and Imperial Irrigation District (IID) staff and by review of the City of Calexico Urban Water Management Plan (2022) (UWMP), the Imperial Irrigation District Water Conservation Plan (2021), the IID Adaptive Water Supply Policy (AWSP) for Non-Agricultural Projects, and the Imperial Integrated Regional Water Management (IRWM) Plan (2012). Additionally, this analysis includes a review of existing utility infrastructure and the need for expanded or new utility infrastructure. Impacts from the proposed project are addressed in part based on the findings of Appendix J, Water Supply Assessment. Water quality, drainage, and groundwater are also discussed in Section 4.8, Hydrology and Water Quality.

4.14.1 Existing Conditions

4.14.1.1 Water Supply and Distribution System

The City of Calexico provides and distributes potable water service within city limits through a municipally owned and operated water system. The City's water supply consists of Colorado River surface water delivered by the Imperial Irrigation District (IID) via the All-American Canal. The City does not independently develop or extract surface water or groundwater resources; instead, it obtains its raw water supply from IID. Through its Public Works Department, including the Water Division, the City owns, operates, and maintains the municipal water treatment and distribution system, which treats, stores, and distributes potable water to residential, commercial, industrial, and institutional customers within the City (Calexico 2022). According to Public Works Department Associate Civil Engineer, the City does not provide water service to agricultural users, and expects future water demand to remain generally consistent with the projections contained in the UMWP (Willams, 2026). The primary constraint to the City’s water supply is the City’s own water treatment capacity. As of the 2020, the City’s water treatment plant (WTP) has a capacity of 14.2 MGD, which is the equivalent of 5,100 million gallons per year (MGY) per year (Calexico, 2022). Thus, the

City's projected available supplies will be based off the current annual capacity of 5,100 MGY (Calexico, 2022).

Water Supply Sources

Municipal Potable Water System

The City of Calexico's municipal potable water system derives its supply from Colorado River water delivered through the IID regional water conveyance network. Overall, the City's water system consists of the following components:

- Raw Water Reservoir
- Water Treatment Plant
- Water Distribution Pipeline Network
- Water Storage Tanks
- Booster Pump Stations

The City's only source of water is raw untreated surface (Colorado River) from the All-American Canal (AAC). The AAC and City-maintained pipelines deliver the water to the City's Water Treatment Plant for treatment, disinfection, and distribution (City of Calexico, 2022).

Following treatment, potable water is conveyed through the City's system of transmission mains, storage reservoirs, pumping stations, and distribution pipelines that serve developed areas throughout Calexico. The municipal system is the sole provider of potable water service within the incorporated City limits.

Unlike many California jurisdictions that rely on multiple water sources such as local groundwater basins, imported water supplies, or recycled water systems, Calexico's municipal water supply is derived entirely from Colorado River allocations delivered through IID infrastructure. As a result, long-term water supply reliability in Calexico is closely tied to Colorado River hydrology, IID delivery operations, and regional water management agreements governing Colorado River allocation and use.

Imperial Irrigation District Water Delivery System

In addition to providing raw water supplies for municipal treatment, the IID operates an extensive irrigation water delivery system throughout Imperial County. IID maintains and operates more than 3,000 miles of canals, laterals, drains, and related conveyance facilities that provide untreated Colorado River water to agricultural users throughout the Imperial Valley.

Portions of Calexico's Sphere of Influence and surrounding areas remain served by IID irrigation infrastructure, particularly in areas historically used for agricultural production.

These facilities include irrigation canals, lateral distribution lines, and drainage channels that may traverse or abut lands identified for future urban development.

IID's sole source of water is its 3.1 million-acre-feet entitlement of Colorado River water. IID has no other additional sources of water supply identified (Gamboa-Arce, 2026).

Water Treatment and Distribution Facilities

The City's WTP treats raw Colorado River water to drinking water standards established by the California State Water Resources Control Board Division of Drinking Water and the U.S. Environmental Protection Agency. Treated water is distributed through a network of transmission mains, storage reservoirs, pumping facilities, and local distribution lines that serve developed areas throughout Calexico.

Over the past several decades, the City has implemented major water infrastructure improvements, including expansion of treatment capacity, storage facilities, and transmission infrastructure to accommodate population growth and economic development. The City's WTP has a capacity of 14.2 MGD, although its permitted capacity is 16.67 MGD per State Water Resources Control Board (City of Calexico, 2022).

4.14.1.2 Wastewater Treatment System

The City owns, operates, and maintains a municipal wastewater collection and treatment system that serves residential, commercial, industrial, and institutional uses throughout Calexico. Wastewater generated within the city is collected through a network of gravity sewer mains, trunk sewers, force mains, and lift stations and conveyed to the City's Wastewater Treatment Plant (WWTP) for treatment and disposal. The WWTP is located along the New River in the southwest part of the City and provides secondary treatment and disposal of municipal wastewater in accordance with permits issued by the Regional Water Quality Control Board. The facility has undergone multiple upgrades and expansions to address aging infrastructure and accommodate future growth. Per the UWMP, the WWTP receive an average wastewater flow of 2.5 MGD, whereas the daily capacity of the WWTP is 4.3 MGD (City of Calexico, 2022). According to the 2025-2026 budget, the City is currently constructing Phase 1 of the Wastewater Treatment Plant Improvements Expansion Project in which is intended to provide adequate capacity for build-out conditions (City of Calexico, 2025).

The City's Service Area Plan (SAP) establishes procedures for system operation, maintenance, monitoring, emergency response, and capital improvement planning in accordance with State Water Resources Control Board requirements. Existing wastewater infrastructure serves developed portions of the City, including the housing sites. The City is anticipating rehabilitating two sanitary lift stations, Station 9 and Station 11, to support

infrastructure improvement and maintain operational standards, as shown on Figure 4.14-1: Anticipated Rehabilitation Lift Stations (Williams, 2026) (City of Calexico, 2025). Additional wastewater collection and treatment facility improvements are identified in the City's Capital Improvement Program FY 2024-2025 (City of Calexico, 2025).

According to City Public Works staff, the existing wastewater infrastructure that serves the developed portions of the City has no major wastewater treatment deficiencies that would affect implementation of the proposed project. However, the City has identified rehabilitation of two sanitary sewer lift stations as a planned infrastructure improvement intended to maintain system reliability and operational performance. Future development projects are required to connect to the municipal sewer system where service is available and may be required to construct local sewer improvements consistent with City engineering standards.

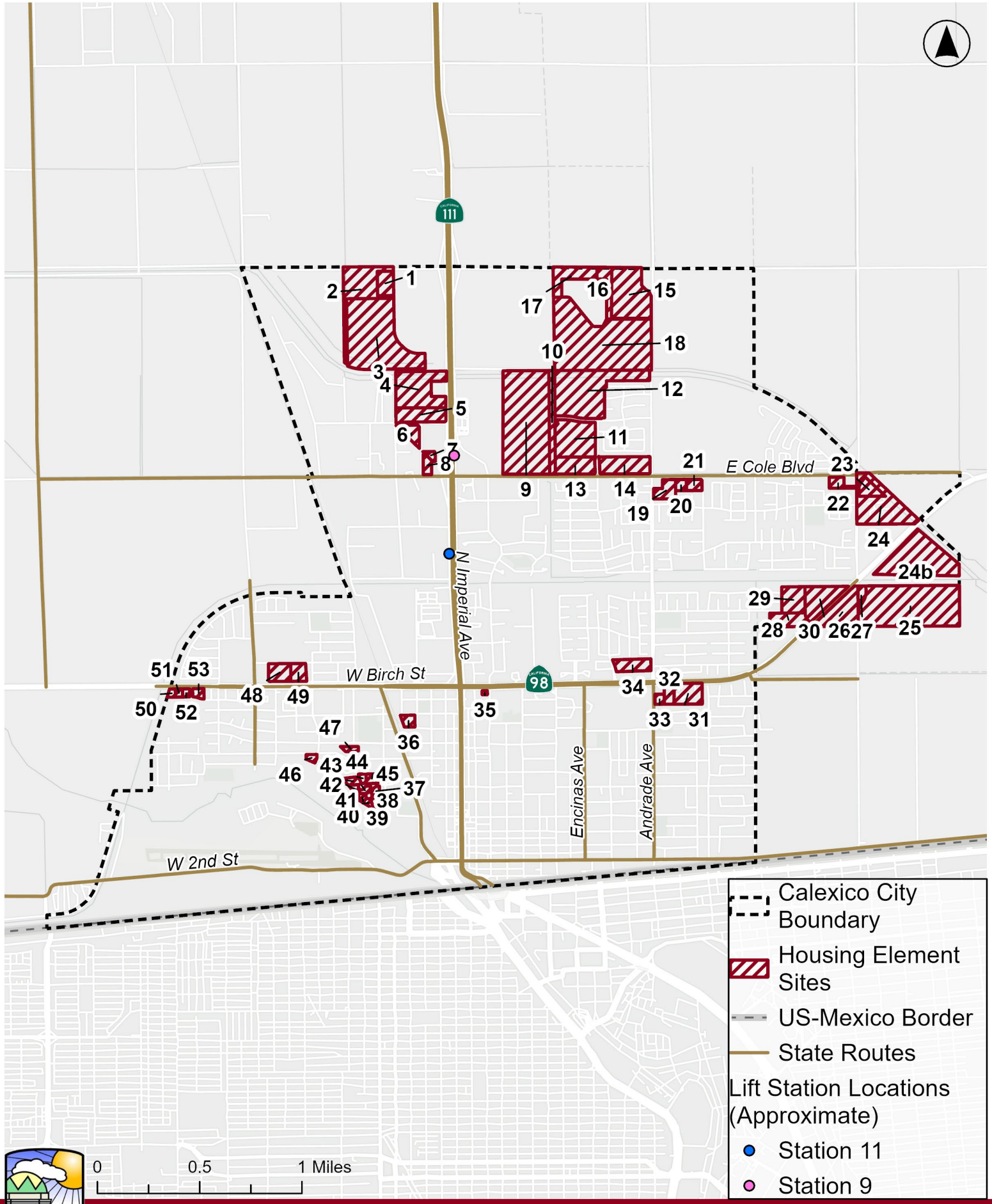


Figure 4.14-1:
Anticipated Rehabilitated Lift Stations

4.14.1.3 Current and Projected Water Use Demands

The City of Calexico's current potable water demand is generated primarily by residential, commercial, industrial, public, and institutional land uses within the City limits. Residential uses represent the largest component of municipal water consumption.

The City's water supply planning is guided by the City of Calexico Urban Water Management Plan (UWMP), which evaluates existing and projected water demands, available water supplies, water conservation measures, and water supply reliability under normal, single-dry-year, and multiple-dry-year conditions. The UWMP incorporates projected population growth and urban development within the City's planning area, including anticipated residential growth used to forecast future water demand.

The City obtains its potable water supply from Colorado River water delivered through the Imperial Irrigation District (IID) conveyance system and treated at the City's Water Treatment Plant. The City has indicated that no new water supply sources are currently anticipated and that existing supplies are expected to continue serving projected development.

Water consumption data provided by the IID indicate that municipal water demand has remained relatively consistent in recent years despite fluctuations associated with weather conditions, conservation practices, and economic activity. Annual potable water consumption totaled approximately 5,520 acre-feet in 2021, 5,336 acre-feet in 2022, 5,078 acre-feet in 2023, 5,341 acre-feet in 2024, and 5,085 acre-feet in 2025 (Willams, 2026). This represents an overall decline of approximately 8 percent between 2021 and 2025.

4.14.1.4 Stormwater and Storm Drain System

The City maintains a stormwater collection and conveyance system consisting of storm drains, catch basins, underground pipelines, channels, detention facilities, and related drainage infrastructure. Stormwater facilities are operated and maintained by the Public Works Department.

Calexico is located within the Imperial Valley, a relatively flat desert basin characterized by limited annual precipitation but periodic intense storm events capable of generating localized flooding. Due to minimal natural drainage gradients, stormwater infrastructure plays a critical role in protecting public safety, maintaining transportation access, and preventing property damage.

Calexico's location within the Imperial Valley presents unique drainage challenges due to the region's relatively flat topography, low natural drainage gradients, and periodic high-intensity storm events. As a result, effective operation and maintenance of the City's stormwater conveyance infrastructure is essential for reducing localized flooding,

protecting public infrastructure, and maintaining access to transportation and emergency service routes.

Stormwater runoff generated within developed portions of the city is conveyed through the municipal drainage system and discharged in accordance with applicable federal and State stormwater regulations. New development projects are required to comply with National Pollutant Discharge Elimination System (NPDES) requirements, City drainage standards, and applicable stormwater quality management requirements.

The City's General Plan Public Facilities and Services Element identifies continued maintenance and expansion of drainage infrastructure as necessary to accommodate future development and reduce flooding risks.

4.14.1.5 Solid Waste

Solid waste collection services within Calexico are provided through the City's solid waste management system. Collection services include residential refuse, commercial waste, recycling, and organic waste collection programs. Solid waste generated within the City of Calexico is collected by a franchised hauler and transported to permitted solid waste facilities serving Imperial County. The closest facility is the Calexico Solid Waste Site, located approximately three miles west of Calexico at 133 W Hwy 98, which provides local solid waste handling services. As of December 2024, the Calexico Solid Waste Site has a remaining capacity of 1,921,178 cubic yards (CalRecycle, 2024). Final disposal of municipal solid waste is primarily provided by Allied Waste Services (Republic Services) at the Imperial Landfill, located approximately 11 miles northwest of Calexico at 104 E Robinson Rd, which serves as the regional landfill for the service area. As of March 2021, the Imperial Landfill has a remaining capacity of 12,027,900 cubic yards (CalRecycle, 2021).

The City has adopted regulations implementing State waste reduction and diversion requirements, including Assembly Bill 939 and Senate Bill 1383. These regulations require recycling, organic waste diversion, and source separation measures designed to reduce landfill disposal and support statewide waste reduction goals.

4.14.1.6 Utilities

Electricity

Electrical service within Calexico is provided by the Imperial Irrigation District (IID), a publicly owned utility that supplies electricity throughout Imperial County. IID operates a regional transmission and distribution network that serves residential, commercial, industrial, and agricultural customers.

Electric infrastructure within the city consists of transmission lines, substations, distribution lines, transformers, and associated facilities.

Natural Gas

Natural gas service within Calexico is provided by Southern California Gas Company (SoCalGas). Natural gas infrastructure includes transmission pipelines, distribution mains, service laterals, and associated facilities that provide service throughout developed portions of the city.

Future residential and commercial development would be capable of connecting to existing natural gas infrastructure where available. Consistent with statewide greenhouse gas reduction efforts, future development may incorporate electrification measures that reduce reliance on natural gas systems.

Telecommunications

Telecommunications services within Calexico are provided by a variety of private service providers offering telephone, broadband internet, wireless communications, fiber optic networks, and related services. Telecommunications infrastructure generally consists of underground and overhead utility lines, wireless communication facilities, antennas, and fiber optic networks located within public rights-of-way and utility corridors.

4.14.2 Regulatory Framework

4.14.2.1 Federal

Clean Water Act

The federal Clean Water Act (CWA) (33 U.S.C. §1251 et seq.) establishes the primary regulatory framework for protecting surface water quality in the United States. The CWA is administered by the U.S. Environmental Protection Agency (USEPA) and the United States Army Corps of Engineers (USACE). Section 401 of the CWA requires state certification for activities requiring federal permits that may result in discharges to waters of the United States, while Section 402 establishes the National Pollutant Discharge Elimination System (NPDES) permit program.

The NPDES program regulates the discharge of pollutants from point sources to waters of the United States and establishes water quality standards to protect public health and aquatic resources. Regulated sources include municipal wastewater treatment facilities, municipal separate storm sewer systems (MS4s), industrial facilities, and construction sites. Under Section 402 of the CWA, construction activities that disturb one acre or more of land must obtain coverage under the State's Construction General Permit and implement best management practices (BMPs) to control erosion, sedimentation, and stormwater pollutants.

In California, the NPDES program is administered by the State Water Resources Control Board (SWRCB) through the Regional Water Quality Control Boards (RWQCBs). The City of

Calexico is located within the jurisdiction of the Colorado River Basin Regional Water Quality Control Board.

Amendments to the CWA in 1987 expanded NPDES requirements to include stormwater discharges from municipal separate storm sewer systems. The City of Calexico operates under the statewide Phase II Small MS4 General Permit (Order No. 2013-0001-DWQ), which regulates stormwater discharges and requires implementation of post-construction stormwater management measures for applicable development and redevelopment projects.

Additional information regarding the NPDES program and other regulations governing stormwater management and stormwater discharges is provided in Section 4.8, Hydrology and Water Quality.

Safe Drinking Water Act

The federal Safe Drinking Water Act (SDWA) (42 United States Code Section 300f et seq.; 40 Code of Federal Regulations Section 141 et seq.) establishes national standards for drinking water quality and authorizes the U.S. Environmental Protection Agency (USEPA) to regulate public drinking water systems throughout the United States. The USEPA is responsible for protecting public health by ensuring the safety of surface water, groundwater, and drinking water supplies, as well as supporting the protection and restoration of aquatic ecosystems. California falls within USEPA Region 9 (Pacific Southwest), which includes Arizona, California, Hawaii, Nevada, the Pacific Islands (Northern Mariana Islands, Guam, and American Samoa), and 148 Tribal Nations located within Arizona, California, and Nevada.

Under the SDWA, the USEPA establishes National Primary Drinking Water Regulations, including Maximum Contaminant Levels (MCLs) for contaminants that may pose risks to human health. The SDWA applies to public water systems that serve at least 25 people or have at least 15 service connections. These systems are required to regularly monitor drinking water quality, comply with applicable treatment and operational standards, and provide public notification when drinking water standards are exceeded.

Resource Conservation and Recovery Act

The federal Resource Conservation and Recovery Act (RCRA) establishes the regulatory framework for the management and disposal of solid waste in the United States. Subtitle D of RCRA specifically governs municipal solid waste landfills and sets minimum standards for landfill siting, design, operation, groundwater monitoring, closure, and post-closure care to protect public health and the environment.

These requirements are codified in Title 40 of the Code of Federal Regulations (CFR), Part 258, which contains the federal criteria for municipal solid waste landfills. Part 258 requires

states to develop and implement their own landfill permitting programs that are consistent with federal standards. The regulations address key aspects of landfill management, including facility location restrictions, operating procedures, design and performance standards, groundwater monitoring requirements, and closure and post-closure maintenance activities.

Energy Independence and Security Act of 2007

The federal Energy Independence and Security Act of 2007 (EISA) (Public Law 110-140) was enacted to improve energy efficiency, increase energy security, and reduce greenhouse gas emissions throughout the United States. EISA established a variety of programs and standards aimed at reducing energy consumption in buildings, transportation, and consumer products. Key provisions of the law include more stringent energy efficiency standards for lighting, appliances, and federal facilities; increased fuel economy requirements for vehicles; and support for the development of renewable energy and advanced energy technologies. EISA promotes sustainable development practices by encouraging energy conservation and reducing reliance on fossil fuels.

Energy Star Program

Energy Star is a voluntary energy efficiency program administered by the U.S. Environmental Protection Agency (USEPA) in partnership with the U.S. Department of Energy (DOE). Established in 1992, the program identifies and promotes energy-efficient products, buildings, and practices that help reduce energy consumption, lower utility costs, and decrease greenhouse gas emissions. Products and buildings that meet Energy Star performance criteria may earn Energy Star certification, indicating that they achieve superior energy efficiency compared to conventional alternatives. The program supports national energy conservation goals by providing consumers, businesses, and local governments with tools and information to improve energy performance and reduce environmental impacts).

Telecommunications Act

The Telecommunications Act of 1996 established a national framework for telecommunications competition and infrastructure deployment. The Act limits local regulation of telecommunications facilities while preserving local authority over land use decisions related to the placement and design of wireless communication facilities.

4.14.2.2 State

Water and Wastewater

Senate Bill 610

Senate Bill 610 (SB 610) amended California Water Code to require detailed analysis of water supply availability for certain types of development projects. This law requires cities and

counties to develop water supply assessments (WSA) when considering approval of applicable development projects to determine whether projected water supplies can meet the project's anticipated water demand. Projects requiring the preparation of a WSA include the following:

- Residential developments of more than 500 dwelling units.
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Hotels or motels with more than 500 rooms.
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- Mixed-use projects that include one or more of the projects listed above.
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

A Housing Element Update is not subject to preparation of a WSA because (1) it is not expressly listed as a project which is subject to a WSA under Water Code Section 10912; (2) General Plan law sets forth an alternative process for local governments to consult with water supply agencies during General Plan preparation (see Government Code Section 65352.5); and (3) the California Legislature envisioned the General Plan being considered during preparation of long-term Urban Water Management Plan preparation, to serve as the first tier of land use and water supply planning coordination, prior to consideration of individual development projects. Furthermore, the County of San Bernardino Superior Court rules in Citizens for Responsible Equitable Environmental Development v. City of Chino (2011) that a "General Plan is not the type of actual development project identified in Water Code 10912 triggering the WSA requirement." Therefore, the proposed project does not require preparation of a WSA pursuant to SB 610. Nevertheless, a water supply assessment has been prepared for the proposed project and is included as Appendix J, consistent with Government Code Section 65352.5.

Senate Bill 221

SB 221 requires lead agencies to obtain an affirmative written verification of sufficient water supply prior to approval of certain specified subdivision projects. For this purpose, water suppliers may rely on an Urban Water Management Plan (UWMP) if the updates to the General Plan (including a Housing Element Update) is accounted for within the UWMP, a WSA or other acceptable information that constitutes "substantial evidence." Because the

Housing Element Update and associated actions is a plan and not a subdivision project, it does not require affirmative written verification of sufficient water supply.

California Department of Water Resources Integrated Regional Water Management Program

The California Department of Water Resources (DWR) Integrated Regional Water Management (IRWM) Program is a statewide, grant-funded initiative that promotes collaborative, multi-jurisdictional planning and implementation of water resource projects at the regional scale. The program supports development of Integrated Regional Water Management Plans that coordinate water supply, water quality, stormwater, wastewater, flood control, habitat, and drought resilience strategies across local agencies, water districts, tribes, and other stakeholders.

California Department of Public Health Drinking Water Program

The California State Water Resources Control Board, Division of Drinking Water (DDW) is the primary state agency responsible for enforcing drinking water quality standards established under the federal Safe Drinking Water Act (SDWA), including maximum contaminant levels (MCLs) applicable to public water systems. If a public water system fails to meet applicable drinking water standards, the water supplier is required to notify customers and work with the regulatory agency to achieve compliance.

For the Calexico service area, oversight is provided by the Division of Drinking Water's regional district office serving Imperial County (District 26), which is responsible for permitting, compliance monitoring, enforcement, and technical assistance for public water systems within the region. The Division of Drinking Water's responsibilities include regulating public water systems to ensure compliance with state and federal drinking water standards; certifying drinking water treatment and distribution system operators; supporting system security and emergency preparedness; and providing technical, managerial, and financial assistance to assist small and disadvantaged water systems. The program also helps facilitate funding opportunities for drinking water system improvements, infrastructure upgrades, and long-term system reliability, which can support jurisdictions such as Calexico in maintaining compliance and accommodating future growth consistent with the Housing Element Update.

California Water Plan (Update 2018)

The California Water Plan is the state's long-range strategic framework for managing and developing California's water resources for current and future needs, as required by the California Water Code. The 2018 Update identifies recommended actions, funding strategies, and investment priorities to guide water managers, planners, and decision-

makers in addressing statewide water supply reliability, water quality, ecosystem protection, and climate-related challenges.

Sustainable Groundwater Management Act (SGMA)

Enacted in 2014, the Sustainable Groundwater Management Act (SGMA) establishes a statewide framework requiring local agencies to sustainably manage groundwater resources. SGMA authorizes local Groundwater Sustainability Agencies (GSAs) to develop and implement Groundwater Sustainability Plans (GSPs) for medium- and high-priority groundwater basins, as designated by the California Department of Water Resources (DWR), with the goal of achieving long-term groundwater sustainability and preventing undesirable results such as overdraft, seawater intrusion, and land subsidence.

Urban Water Management Planning Act

The Urban Water Management Planning Act, enacted by the California Legislature in 1983 (California Water Code Sections 10610–10656), requires urban water suppliers serving 3,000 or more customers or delivering more than 3,000 acre-feet per year to plan for and demonstrate reliable water service under a range of hydrologic conditions, including normal, dry, and multiple dry-year scenarios. The Act directs water suppliers to prepare and adopt an Urban Water Management Plan (UWMP) at least once every five years and to submit the plan to the California Department of Water Resources (DWR) for review.

In accordance with the Urban Water Management Planning Act, the City is required to update its UWMP at least every five years and submit it to the California Department of Water Resources (DWR) for review. The UWMP also includes a Water Shortage Contingency Plan (WSCP), which establishes staged demand reduction measures that may be implemented during periods of water supply shortage. Because Calexico's supplies are dependent on regional Colorado River allocations managed through IID and governed by State and federal shortage guidelines, shortage response actions are coordinated through the City's WSCP in conjunction with regional water management conditions.

California Code of Regulations

Title 22

Title 22 of the California Code of Regulations establishes drinking water quality standards and provides the regulatory framework for the State Water Resources Control Board, Division of Drinking Water (DDW) to oversee and permit public water systems. The regulations set enforceable requirements for maximum contaminant levels (MCLs), water quality monitoring, reporting, and system operation.

The City of Calexico operates a public water system under State Water System Permit No. CA4910014. In accordance with Title 22 requirements, the City routinely monitors drinking

water quality, implements required treatment and operational standards, and prepares and distributes annual Consumer Confidence Reports (CCRs) to customers summarizing water quality data and compliance status..

Title 24

Title 24 of the California Code of Regulations, known as the California Building Standards Code, establishes statewide standards governing building design and construction, including plumbing, electrical systems, energy efficiency, accessibility, and indoor environmental quality. The current adopted edition is the 2022 California Building Standards Code, which is updated on a three-year cycle; the next update is anticipated in 2025.

The portions of Title 24 most relevant to utilities and service systems are summarized below:

- **PART 5 – CALIFORNIA PLUMBING CODE:** The California Plumbing Code regulates plumbing system design and installation, including water supply and distribution systems, plumbing materials, fixtures, water heaters, venting, and drainage systems. The Code includes requirements for water conservation, including mandatory installation of water-efficient plumbing fixtures such as low-flow toilets, faucets, and showerheads. These requirements are intended to reduce indoor water consumption in new development and substantial remodels. In addition, California Civil Code Section 1101.1 et seq. (Senate Bill 407, 2009) requires the retrofit of certain existing residential and commercial properties with water-efficient plumbing fixtures upon resale or renovation, further supporting statewide water conservation objectives.

  PART 11 – CALIFORNIA GREEN BUILDING STANDARDS: The California Green Building Standards Code (CALGreen), codified in Title 24, Part 11, establishes mandatory minimum green building requirements for all new residential and non-residential construction. CALGreen was initially adopted as a voluntary code in 2009 and became mandatory statewide beginning in 2011. The 2025 CALGreen Code includes baseline requirements for planning/design, energy efficiency, water efficiency/conservation, material conservation/resource efficiency, and environmental quality. Mandatory water-related provisions include water-efficient plumbing fixtures and fittings and separate metering for certain large buildings, additions, and high-water-use tenants. CALGreen also establishes voluntary Tier 1 and Tier 2 standards that provide enhanced performance requirements, including 12 percent and 20 percent reductions, respectively, in indoor potable-water use compared with the applicable water-use baseline, as well as additional measures addressing outdoor water use, water reuse, irrigation, stormwater, and low-impact development.

Senate Bill 606 and Assembly Bill 1668

Senate Bill 606 and Assembly Bill 1668, enacted in 2018, establish a framework for long-term urban water conservation by directing the State Water Resources Control Board to develop performance-based water use efficiency standards for indoor use, outdoor irrigation, and water loss (leakage). The legislation emphasizes maximizing the efficient use of existing water supplies as a cost-effective strategy for achieving statewide water reliability and resilience.

The State Water Resources Control Board is responsible for adopting implementing regulations, including standards for water use efficiency and variances to account for regional and local conditions.

Senate Bill 1087 (2006)

Senate Bill 1087 requires local governments to provide adopted housing elements to water and wastewater providers. Water and sewer providers are required to accord priority service allocation to proposed housing developments that include units affordable to lower-income households.

The law also requires Urban Water Management Plans to include projected water demand associated with future housing needs, including lower-income households, to ensure coordination between land use planning and water supply planning.

Senate Bill 221 and Senate Bill 610 (January 2002)

Senate Bill 610 requires water supply assessments (WSAs) to be prepared and incorporated into the CEQA documentation for large development projects. Senate Bill 221 requires written verification of sufficient water supply prior to approval of certain residential subdivisions.

These requirements generally apply to projects that include more than 500 residential units, or non-residential development that would generate substantial employment growth or exceed specified square footage thresholds. Together, SB 610 and SB 221 ensure that water supply reliability is evaluated early in the project approval process.

Water Conservation Act of 2009 (Senate Bill X7-7)

The Water Conservation Act of 2009 (Senate Bill X7-7) established statewide urban water use efficiency targets, including a goal to reduce per capita urban water consumption by 20 percent by 2020. The legislation requires water suppliers to develop water conservation targets, implement efficiency measures, and report progress to the Department of Water Resources. Compliance with SB X7-7 is also tied to eligibility for certain state funding programs, thereby incentivizing continued water conservation and demand management efforts.

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires cities and counties to prepare Source Reduction and Recycling Elements and achieve mandated solid waste diversion goals. Initially, jurisdictions were required to divert 25 percent of waste by 1995 and 50 percent by 2000. The Act established CalRecycle oversight of local waste diversion efforts and created a statewide framework for recycling and waste reduction planning.

2006 Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ)

The State Water Resources Control Board adopted Statewide Waste Discharge Requirements for sanitary sewer systems to reduce and prevent sanitary sewer overflows (SSOs). The order applies to publicly owned sewer collection systems and requires system maintenance, monitoring, reporting, and spill response procedures to protect water quality and public health.

Energy and Utilities

California Energy Commission

The California Energy Commission is the state's primary energy policy and planning agency responsible for energy efficiency standards, energy forecasting, and certification of large thermal power plants. The CEC implements Building and Appliance Energy Efficiency Standards that reduce electricity and natural gas consumption statewide and support California's greenhouse gas reduction goals.

California Public Utilities Commission

The California Public Utilities Commission (CPUC)regulates privately owned electric and natural gas utilities in California. The CPUC oversees utility service reliability, rates, and infrastructure planning for investor-owned utilities serving millions of customers across the state, including natural gas providers. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous state legislative enactments and various Federal statutory and administrative requirements.

Senate Bill 350

Senate Bill 350 establishes statewide goals to double energy efficiency savings in electricity and natural gas consumption by 2030. The legislation also advances renewable energy procurement and greenhouse gas reduction strategies as part of California's long-term climate policy framework.

Solid Waste and Recycling

California Department of Resources Recycling and Recovery

CalRecycle oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the state waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

California Integrated Waste Management Act of 1989 (Assembly Bill 939 and as amended by Assembly Bill 341

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires cities and counties to prepare Source Reduction and Recycling Elements and achieve mandated solid waste diversion goals. Initially, jurisdictions were required to divert 25 percent of waste by 1995 and 50 percent by 2000. The Act established CalRecycle oversight of local waste diversion efforts and created a statewide framework for recycling and waste reduction planning.

Senate Bill 1383 Organic Waste Reduction Regulations

Senate Bill 1383 establishes statewide targets to reduce methane emissions from landfilled organic waste. The law requires jurisdictions and waste haulers to implement programs that reduce organic waste disposal and increase organic material recovery, including food waste recovery and diversion. SB 1383 establishes requirements for organic waste collection, procurement of recovered organic products, and edible food recovery from commercial generators, with phased implementation beginning in 2022.

Assembly Bill 341

Assembly Bill 341 expands California's recycling requirements by mandating commercial recycling for businesses generating specified amounts of solid waste and requiring recycling services for multifamily residential properties with five or more units. AB 341 also establishes a statewide goal of achieving 75 percent waste diversion and supports development of expanded recycling infrastructure and services throughout the state.

Senate Bill 1016

Senate Bill 1016 revised California's solid waste diversion reporting methodology by transitioning from percentage-based diversion goals to a per-capita disposal measurement system (pounds per person per day). The legislation also established updated CalRecycle review procedures for local source reduction and recycling programs to evaluate jurisdictional compliance on a recurring schedule.

Assembly Bill 1826

Assembly Bill 1826 requires businesses and certain multifamily residential properties to implement organic waste recycling programs based on the amount of waste generated. The law phases in requirements for commercial generators and mandates local jurisdictions to implement programs that facilitate organic waste diversion, including food waste, green waste, and landscape materials.

Senate Bill 1374

Senate Bill 1374 directs CalRecycle to develop model ordinances and guidelines to assist jurisdictions in diverting construction and demolition (C&D) debris from landfills. Many jurisdictions, including the City of Calexico, have adopted local C&D recycling ordinances to comply with state diversion requirements and support broader waste reduction goals under AB 939 and CALGreen. Under California's CALGreen Building Standards Code, most permitted new construction and demolition projects must divert at least 65 percent of their generated construction and demolition (C&D) waste from landfills.

4.14.2.3 Regional

Imperial Irrigation District Water Conservation Plan (2021)

The Imperial Irrigation District (IID) Water Conservation Plan establishes a comprehensive framework for improving water use efficiency and maintaining long-term reliability of Colorado River water supplies within Imperial County. The Plan was developed pursuant to federal conservation requirements and supports implementation of the Quantification Settlement Agreement (QSA) and related Colorado River water management obligations.

The Plan identifies water conservation measures including canal lining and modernization projects, operational improvements, water accounting programs, system maintenance activities, and agricultural conservation programs. Because the City of Calexico receives its municipal water supply through IID's regional water delivery system, implementation of IID conservation measures contributes to the long-term reliability of potable water supplies available to the City.

The Water Conservation Plan also supports continued coordination between IID and local agencies regarding future growth, water supply reliability, and infrastructure planning. Calexico is one of seven cities within the IID service area, which also includes Brawley, El Centro, City of Imperial, Holtville, Westmorland, and Calipatria.

IID Adaptive Water Supply Policy for Non-Agricultural Projects

Future municipal water service and urban development within Calexico would be influenced by IID’s Adaptive Water Supply Policy (AWSP) for Non-Agricultural Projects, which establishes procedures for evaluating requests for conversion of agricultural water service

to urban uses. The AWSP ensures that water supply allocations are consistent with IID's Colorado River water entitlements and long-term system reliability.

The Imperial Irrigation District (IID) Adaptive Water Supply Policy (AWSP) for Non-Agricultural Projects establishes a framework for evaluating and providing water service to new non-agricultural developments within the IID service area, including municipal, industrial, commercial, energy, and mixed-use projects. Originally adopted as the Interim Water Supply Policy in 2009 and updated as the Adaptive Water Supply Policy in 2025, the policy designates up to 25,000 acre-feet per year of IID's Colorado River water supply for new non-agricultural uses while ensuring that new water demands do not adversely affect existing agricultural, municipal, or industrial water users. The policy establishes procedures for obtaining water supply agreements, evaluating project water demands, and assessing potential environmental and water supply impacts associated with proposed developments.

Projects requesting water service under the AWSP may be required to pay reservation and water supply development fees that support water conservation, supply augmentation, and resource management programs intended to maintain long-term water supply reliability within the Imperial Valley. The policy also requires that proposed projects obtain applicable land use approvals and demonstrate that environmental impacts have been adequately evaluated prior to approval of a water supply agreement.

Imperial Integrated Regional Water Management Plan

The Imperial Integrated Regional Water Management (IRWM) Plan provides a comprehensive framework for the coordinated management of water resources within Imperial County. Prepared through a collaborative process involving local agencies, water providers, stakeholders, and community organizations, the plan identifies regional water management goals, objectives, and projects intended to improve water supply reliability, protect water quality, enhance flood management, support environmental resources, and promote sustainable water use. The IRWM Plan integrates water supply, groundwater management, stormwater management, habitat conservation, and climate resilience strategies to address current and future water resource challenges facing the Imperial region. The IRWM Plan also serves as a basis for prioritizing and securing state funding for regional water infrastructure, conservation, and resource management projects that support long-term water sustainability and regional resilience.

Quantification Settlement Agreement

The Quantification Settlement Agreement (QSA), executed in 2003, is a series of agreements among the Imperial Irrigation District (IID), Coachella Valley Water District (CVWD), San Diego County Water Authority (SDCWA), Metropolitan Water District of Southern California (MWD), and other state and federal agencies that established long-term guidelines for the

use and transfer of Colorado River water in California. The QSA quantifies IID's annual Colorado River water entitlement and facilitates water conservation and transfer programs that allow conserved water to be delivered to urban water agencies while maintaining California's compliance with its allocated share of Colorado River water. The QSA includes provisions related to water conservation, water transfers, environmental mitigation, Salton Sea impacts, and long-term water supply reliability.

Imperial County Multi-Jurisdictional Hazard Mitigation Plan

The Imperial County Multi-Jurisdictional Hazard Mitigation Plan (HMP) identifies natural and human-caused hazards affecting communities throughout Imperial County, including Calexico. Developed in accordance with the federal Disaster Mitigation Act of 2000, the plan identifies hazards that may affect local communities, including earthquakes, flooding, extreme heat, drought, wildfire, severe weather, and infrastructure-related emergencies. The HMP evaluates community vulnerabilities, assesses potential risks, and establishes mitigation goals, policies, and actions intended to reduce loss of life, property damage, and disruption of critical services. The plan also supports eligibility for federal hazard mitigation funding and serves as a guide for integrating hazard resilience into local planning and development decisions.

The HMP includes goals and mitigation actions intended to improve the resilience of critical infrastructure systems, including potable water facilities, wastewater treatment facilities, storm drainage systems, electrical infrastructure, and communication networks. Regulations pertaining to the IID are found in section 3.9.3, and include:

- **Regulation No. 26: Control System.** The maintenance and operation of the canals and laterals of the District shall be under the exclusive management and control of the Manager, Water Department, and no person except authorized employees of the District shall have any right to interfere with said canals or works in any manner.
- **Regulation No. 27: Control of Structures and Delivery Gates.** The District shall have employees assigned to perform the water service duties of the District at all times, and it is essential to good service that none but assigned employees move or tamper with any part of any gate or structure in the canal system.
- **Regulation No. 30: Access to a Water User's Premises.** In order to carry on drainage investigations, make crop surveys, and to inspect the canals and drainage ditches or the flow of water therein, employees or agents of the District shall have free access at all times to lands irrigated from the canal system of the District.
- **Regulation No. 31:** Rights-of-Way related to (1) obstruction of rights-of-way; (2) keeping livestock out of canals and drains and away from banks; (3) acquisition and clearing in connection with construction of district drains.

- **Regulation No. 32**: Surveys and Investigations – (1) surveys for concrete head ditches; (2) farm drainage investigations (3) canal and lateral seepage investigations.
- **Regulation No. 34:** Rearrangement and Concrete Lining and/or Exclusion of Irrigation Lateral Canals.
- **Regulation No. 36: Use of Drains. (**1) The draining of water, and (2) disposal of sewage effluent or industrial waste.
- **Regulation No. 37: Deep Drains**. The District has undertaken development of a deep drainage system, which will provide facilities for one drainage outlet from each governmental subdivision of approximately 160 acres.
- **Regulation No. 38: Lateral Drains.** The District will construct lateral drains as a part of the District's drainage system to provide a tile and/or surface drain outlet for each governmental subdivision of approximately 160 acres.
- **Regulation No. 42: Pipeline Drains**. Pipelining of existing open drains or construction of a new pipeline drain may be requested by the landowners affected by such drainage in lieu of open drains to provide outlet for surface and subsurface drainage.
- **Regulation No. 43**: Reconstruction and/or Deepening of Existing Drains. When necessary to provide an outlet for open or tile drains the District will reconstruct and/or deepen existing drains.

Colorado River Basin Municipal Storm Water Permitting Program

The Colorado River Basin Municipal Storm Water Permitting Program is administered by the Colorado River Basin Regional Water Quality Control Board to regulate stormwater discharges from municipal separate storm sewer systems (MS4s) and other municipal activities within the Colorado River Basin Region. The program implements requirements of the federal Clean Water Act and the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) program to reduce pollutants in stormwater runoff and protect receiving water quality. Participating municipalities are required to implement stormwater management measures, including public education, illicit discharge detection and elimination, construction-site runoff controls, post-construction stormwater management, and good housekeeping practices for municipal operations.

Colorado River Basin Regional Storm Water Management Program

The Colorado River Basin Regional Storm Water Management Program provides a regional framework for managing stormwater runoff and protecting water quality within the Colorado River Basin Region. The program promotes coordination among local jurisdictions, public agencies, and stakeholders to address stormwater-related water quality issues through planning, monitoring, pollution prevention, and implementation of best management practices (BMPs). Program objectives include reducing pollutant discharges to surface

waters, improving watershed health, promoting regulatory compliance, and supporting sustainable stormwater management strategies. The program assists participating agencies in meeting state and federal water quality requirements while protecting regional water resources and beneficial uses.

4.14.2.4 Local

City of Calexico Urban Water Management Plan

The City of Calexico Urban Water Management Plan (UWMP) serves as the City's long-range planning document for managing water resources and ensuring a reliable water supply for existing and future residents and businesses. Prepared in accordance with the California Urban Water Management Planning Act, the UWMP evaluates current and projected water demands, available water supplies, water system infrastructure, water conservation measures, and water shortage contingency planning. The UWMP identifies strategies to improve water use efficiency, maintain service reliability, and address future water supply challenges associated with population growth, climate variability, and regulatory requirements. The UWMP provides a framework for coordinating water resource planning with land use decisions and capital improvement programs.

- **Section 3, Water Sources and Supplies,** describes the City's water supply system and the sources available to meet existing and future demands. The section identifies the Colorado River, conveyed through the Imperial Irrigation District's (IID) All-American Canal, as the City's sole source of raw potable water and discusses the City's water treatment and distribution system. It also summarizes the legal framework governing Colorado River water rights, including the "Law of the River" and IID's water rights, historical and projected water supply volumes, supply reliability, planned water supply projects, alternative water source evaluations, and the energy intensity associated with water treatment and delivery.
- **Section 4, Recycled Water Opportunities,** evaluates the potential for expanding recycled water use within the City's service area. The section describes the City's wastewater collection and treatment system, identifies existing recycled water use, and evaluates opportunities for future recycled water production and beneficial reuse.
- **Section 6, Water Use,** characterizes historical, current, and projected water demands throughout the City's service area. The section summarizes population and service area characteristics, historical water deliveries, water use by sector, and projected demands through the planning horizon. It also evaluates per capita water use, demand forecasting assumptions, and the anticipated effects of future development and water conservation measures on overall water demand.

- **Section 7, Reliability Planning,** evaluates the City's ability to meet projected water demands under normal, single dry-year, and multiple dry-year conditions. The section compares projected water supplies with projected demands, identifies potential supply shortages under varying hydrologic conditions, and evaluates the reliability of the City's water supply portfolio through the planning horizon.
- **Section 8, Contingency Planning,** serves as the City's Water Shortage Contingency Plan (WSCP) and establishes a framework for responding to water supply shortages and emergency conditions. The section discusses the need for contingency planning, legal authority to implement shortage response measures, water supply reliability analyses, annual water supply assessments, regional coordination, and the City's contingency response actions. It also addresses disaster management procedures, enforcement and evaluation measures, fiscal impacts associated with water shortages, planning for a minimum three-year water supply, and procedures for adoption and periodic refinement of the WSCP.
- **Section 9, Conservation Measures,** describes the City's water conservation program and the measures implemented to improve long-term water use efficiency. The section summarizes the Department of Water Resources' Demand Management Measures (DMMs) required for the 2022 UWMP, the California Water Efficiency Partnership (CalWEP) Best Management Practices (BMPs), and the City's existing conservation programs. It discusses measures such as public education and outreach, water system audits and leak detection, metering, water waste prevention, conservation-oriented planning, and other water use efficiency practices.

City of Calexico Capital Improvement Program

The City of Calexico implements a five-year Capital Improvement Program (CIP) to identify, prioritize, and fund infrastructure improvements necessary to maintain and expand public services, including water supply, water treatment, and wastewater collection and treatment. The CIP serves as the City’s primary infrastructure planning and budgeting tool and is updated annually through the City’s budget adoption process.

As reflected in the City’s FY 2024–2029, the City continues to invest in both water and wastewater system improvements to maintain existing levels of service, address aging infrastructure, and ensure compliance with state and federal regulatory requirements. Planned and programmed water system improvements include but are not limited to rehabilitation of critical storage tanks, new clarifier and filter system, water pipeline replacement, and distribution system expansion. The CIP also identifies continued investment in system reliability and operational efficiency through facility modernization and replacement of key mechanical and electrical components within the City’s water treatment and distribution system.

In addition to water system improvements, the CIP includes wastewater system capital projects such as upgrades to the City's wastewater treatment plant, including but not limited to disinfection enhancements (including ultraviolet disinfection system upgrades), lift station rehabilitation, and replacement of laboratory equipment. These efforts are funded by Fund 516: Water enterprise and Fund 547: Wastewater enterprise.

City of Calexico Service Area Plan

The City of Calexico prepared the 2018 Service Area Plan (SAP) to evaluate the City's existing water treatment and distribution system, identify infrastructure deficiencies, and establish a long-term strategy for providing adequate water service to existing and future development within the City's service area. The SAP assesses existing water supply, treatment, storage, transmission, and distribution facilities, evaluates the ability of the system to accommodate projected growth, and identifies capital improvements needed to maintain system reliability, water quality, and fire protection.

The SAP identifies a phased program of water system improvements over a 15-year planning horizon. Recommended short-term improvements include replacing approximately 22,300 linear feet of undersized water pipelines to improve fire flow capacity, replacing approximately 60,264 linear feet of aging cast iron water mains, and replacing the filter control system at the City's water treatment plant. Medium-term improvements include construction of a new 18-inch water supply pipeline along the All-American Canal to serve the Eastside Storage Tank and replacement of outdated fire hydrants to meet current standards. Long-term improvements include installation of backbone transmission mains to serve future expansion areas and support planned growth. The SAP recommends improvements to water treatment and distribution facilities, including that all system improvements shall be designed and constructed in accordance with Federal, State and local regulations and standards.

City of Calexico General Plan

Public Facilities/Services Element

The Public Facilities/Services Element of the City of Calexico General Plan provides policy direction for the planning, financing, expansion, and maintenance of public infrastructure and services needed to support existing development and future growth. The element includes goals and policies that require adequate water, wastewater, storm drainage, solid waste, police, and fire protection facilities to be available concurrent with development and promote the efficient use of existing infrastructure. The element also supports the preparation and implementation of capital improvement programs, the coordination of land use and infrastructure planning, and the use of development impact fees and other financing mechanisms to fund necessary public facility improvements. These policies are intended to

ensure that public utilities and services maintain acceptable service levels and remain capable of accommodating future development within the City. Objectives 1-4 and their respective policies correspond to facilities and services development, sewer, potable water, and stormwater, and include:

- **Objective 1**: To coordinate planning and development of Calexico' s public facilities and services with the private development sector, Calexico Unified School District, San Diego State University, Imperial County, and other public agencies.
    - **Policy 1a**: Establish funding mechanisms to fund the construction or expansion of public services and facilities necessitated by new development. The City should adopt appropriate ordinance(s) that implement impact fees and/or exactions on developers to fund the construction of public facilities caused by the new development. The ordinance should delineate methods for fee calculation to allow developers to know in advance their expected fee.
    - **Policy 1b**: The City should, where appropriate and feasible, create assessment districts to fund certain public improvements.
    - **Policy 1c**: The City should use general obligation and revenue bonds to finance long-term capital improvements.
    - **Policy 1d**: Develop joint-use/joint-power agreements with Calexico Unified School District, San Diego State University, and other special districts or agencies. Examples of facility agreements include libraries, theaters, learning facilities, and athletic fields.
    - **Policy 1e**: The City shall consider combining agencies that provide similar services in order facilitate acquisition of these services and to prevent similar agencies from performing the same tasks.
- **Objective 2**: To provide high quality sewage services to existing residents as well as to accommodate future growth and development.
    - **Policy 2a**: Approve new development only if sewer facilities will be expanded to serve these areas at the expense of the developer or City.
    - **Policy 2b**: Continually monitor the existing sewer system to identify any necessary improvements to maintain high quality service and to ensure compliance with secondary treatment standards.
    - **Policy 2c:** Sewer service shall exist prior to the approval of any new development application which requires community sewer service.
    - **Policy 2d:** Future sewer service expansions should be designed to maintain adequate level of service.
    - **Policy 2e:** The extension of sewage transmission lines or pumping services to accommodate new developments should be limited to within one quarter mile of developed areas.

  - **Policy 2f:** All improvements to the existing sewer system necessitated by the approval of a new development project shall be financed entirely by the proponent either by fee or actual construction.
  - **Policy 2g:** All future tentative maps should be approved only with conditions based on water and sewer service availability. There shall be no exceptions, either on occasion or by approval.
- **Objective 3**: To provide high quality potable water services to existing residents as well as to accommodate future growth and development.
  - **Policy 3a**: The City shall assess existing water capacity when reviewing applications for new development, and comply with Senate Bills 610 and 221 requiring water supply assurance for projects of significant size (any project requiring water in the amount of or greater than that which would be required by a 500 dwelling unit residential project).
  - **Policy 3b:** All improvements to existing water system that are necessitated by a new development shall be financed entirely by the developer either by fee or actual construction.
  - **Policy 3c:** The dedication, maintenance, and construction of new water storage facilities, pumps, and transmission lines to serve new development shall be reviewed by the City with each new development application.
  - **Policy 3d:** The City shall incorporate measures to promote the conversation of water in new and existing development, specifically best available technologies in new construction and site development, including, but not limited to, water-saving toilets, showerheads, faucets, and water conserving irrigation.
  - **Policy 3e:** The extension of water service facilities such as transmission lines or pumps should be limited to one-quarter mile across an undeveloped area when necessitated by new development.
- **Objective 4**: To maintain the current system and to provide long-term solutions for storm water runoff for the City.
  - **Policy 4a**: The City shall continue to require developers to construct or finance the necessary storm water runoff facilities such as underground storm drains and retention basins.
  - **Policy 4b:** The City should continue to work with the appropriate agencies to develop new arrangements for the discharge of storm water into the New River. To the extent feasible, these arrangements shall be consistent with the New River Improvement Project referenced and described in Section 5.2.5 of the Conservation/Open Space Element.

- **Policy 4c:** The City shall continue to work with IID to provide adequate storm water discharge in areas where applicable and in new development.
- **Policy 4d:** Continually monitor the existing storm water system to identify any necessary improvements to maintain high quality service.

Safety Element

The Safety Element of the City of Calexico General Plan establishes goals and policies intended to protect the community, public infrastructure, and essential services from natural and human-caused hazards. Relevant to utilities, the Safety Element addresses hazards that may affect the operation and reliability of critical infrastructure systems, including flooding, earthquakes, extreme weather events, hazardous materials incidents, and emergency access constraints. The element supports maintaining and improving infrastructure resilience, ensuring adequate emergency access for utility maintenance and emergency response, and protecting facilities and services that are essential to public health and safety during emergency events. These policies help guide the planning and operation of utility systems to minimize service disruptions and support community resilience.

Calexico Municipal Code

Title 13 – Public Services and Utilities

Title 13 of the Calexico Municipal Code (Public Services and Utilities) establishes regulations governing the provision, operation, and maintenance of public utility services within the City. The title contains requirements related to municipal water, wastewater, and other utility services, including service connections, infrastructure standards, fees, operational responsibilities, and enforcement provisions. These regulations are intended to ensure the orderly provision of public utilities, protect public health and safety, and maintain the reliability and efficiency of utility systems serving the community.

Section I., Water Services, of Title 13, states that, “Water resources are limited, and the city strives to provide water in an efficient way and to conserve where necessary. As such, the city reserves the right pursuant to state law to limit water service when necessary in the interest of the public health and safety.” (Section 13.01.060). Additionally, Section 13.01.450 states that “in time of water scarcity, whenever it shall in the judgment of the city council by resolution be necessary to limit the use of water, it shall be unlawful for any person by himself or herself, family, servants or agents to violate any resolution made by the city council pursuant to this section or pursuant to Chapter 13.40.”

Chapter 8 – Solid Waste Disposal

Chapter 8.36 of the Calexico Municipal Code (Solid Waste Disposal) establishes regulations for the collection, storage, transportation, and disposal of solid waste generated within the City. The chapter identifies responsibilities for property owners, occupants, waste haulers, and service providers, and establishes standards intended to protect public health, safety, and environmental quality. The regulations support compliance with state and local solid waste management requirements and promote the proper handling and disposal of municipal solid waste.

Title 17 – Zoning

Title 17 of the Calexico Municipal Code (Zoning Ordinance) regulates land use and development within the City and includes standards that affect the siting, design, and operation of utility infrastructure and public service facilities. The title establishes zoning districts, development standards, and permit requirements for various land uses, including utility facilities, water and wastewater infrastructure, solid waste facilities, and other public service uses. Through these regulations, Title 17 helps ensure that utility infrastructure is appropriately located and developed in a manner that is compatible with surrounding land uses and consistent with the City's planning objectives.

4.14.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, impacts to utilities and service systems would be significant if the project would:

1) Threshold 1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities which could cause significant environmental effects.
2) Threshold 2: Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
3) Threshold 3: Result in determination by the wastewater provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4) Threshold 4: Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5) Threshold 5: Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.14.4 Methodology

The analysis of utilities and service systems evaluates whether implementation of the proposed project could result in impacts associated with the provision and capacity of water supply, wastewater treatment, stormwater drainage, electricity, natural gas, telecommunications, and solid waste services. Because the Housing Element Update is a policy-level planning document that does not directly authorize construction, impacts are assessed at a programmatic level based on reasonably foreseeable development facilitated by the City's updated housing capacity and policies.

The analysis considers existing service provider conditions, adopted general plan policies, and applicable federal, State, and local regulations governing utility provision and infrastructure planning. Key service providers include the City of Calexico Public Works Department for municipal water, wastewater, and storm drainage services; the Imperial Irrigation District (IID) for imported raw water supply and electrical service; private providers for natural gas and telecommunications; and regional solid waste facilities serving Imperial County.

The analysis assumes that future development enabled by the proposed project would occur incrementally over the planning horizon and would be required to comply with applicable development review procedures, utility connection requirements, and infrastructure financing mechanisms (e.g., development impact fees and capacity fees). Future development projects that could result from implementation of the proposed project would be regulated by the various laws, regulations, and policies summarized above in Section 4.14.2, Regulatory Framework. Compliance with applicable federal, State, regional, and local laws and regulations is assumed in this analysis and local and State agencies would be expected to continue to enforce applicable requirements to the extent that they do so now. It is also assumed that utility providers will continue to implement routine capital improvement planning and system upgrades consistent with adopted master plans and regulatory requirements.

4.14.5 Issue 1: New, Expanded or Relocation of Utility Infrastructure

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

4.14.5.1 Impact Analysis

Water

The proposed project is a programmatic planning effort consisting of the Housing Element Update and associated rezoning actions. These actions establish the policy and regulatory framework for future development but do not approve or authorize specific development projects. Future residential and nonresidential development facilitated by the proposed project may increase demand for water facilities. However, future development as a result of the proposed project would occur within urbanized areas that are served or planned to be served by existing public utility infrastructure and would be subject to the City's development review process to ensure adequate utility service and infrastructure are available. Accordingly, development facilitated by the project is anticipated to generally avoid undeveloped areas lacking water infrastructure and focus development in areas of Calexico with existing water infrastructure. Additionally, water utility mains are often located beneath existing roadways, which are typically paved and do not contain sensitive environmental resources, such as wetlands and riparian habitat.

As further discussed in Issue 2, the proposed project would result in a water demand of approximately 1,190 MGY at full buildout in 2050, without assuming a reduction in consumption rate. However, the actual timing of development depends on factors such as market conditions, property owner decisions, financing availability, and regulatory approvals. Actual water demand associated with future development would likely occur over an extended timeframe and would be evaluated through subsequent project-level review.

As part of the City’s development review process, implementing projects would be evaluated for consistency with applicable General Plan policies, the Calexico Urban Water Management Plan (UWMP) adopted in 2022, and applicable Calexico Municipal Code (CMC) and Building Code standards. Depending on the nature and scale of the proposed development, project-specific analyses such as hydraulic modeling, fire flow testing, and utility improvement plans may be required once detailed development plans are available to verify adequate system capacity and identify any necessary infrastructure improvements. All individual development projects would also be required to fund or construct necessary infrastructure improvements consistent with the City’s Capital Improvement Program (CIP), which includes upgrades to water facilities. Additionally, future development implementing the proposed project would be required to comply with the CALGreen Code, which requires that new construction use high-efficiency plumbing fixtures, such as high-efficiency toilets, urinals, showerheads, and faucet fixtures.

Accordingly, although future development facilitated by the proposed project may increase demand for public utilities, the proposed project would not, by itself, result in the relocation

or construction of water facilities. Any required utility improvements would be identified and implemented as part of future development approvals. Water supply availability is discussed further under Issue 2 below. Therefore, impacts to water would be less than significant.

Wastewater

Future development facilitated by the proposed project may increase demand for wastewater infrastructure; however, such development would generally occur within urbanized areas served or planned to be served by existing public infrastructure and would be subject to the City's development review process to ensure adequate wastewater services and infrastructure are available. In addition, future projects developed under the proposed project would be required to comply with all applicable federal, State, and local laws, regulations, and procedures. This includes the latest adopted edition of the California Plumbing Code and CALGreen Code, including the provisions for water-efficient fixtures and toilets, which would reduce the amount of effluent entering the wastewater system. This also includes the General Plan Public Facilities/Services Element, Sewers Policy 2a-g, which requires future applicants to be responsible for constructing and financing wastewater treatment conveyance connections and improvements.

During the development application process, applicants coordinate with the City's Public Works Department to verify adequate sewer system capacity and identify any necessary infrastructure improvements. All individual development projects would also be required to fund or construct necessary infrastructure improvements consistent with the City's Capital Improvement Program (CIP), which includes upgrades to sewer facilities.

If future developments under the proposed project would require the construction and operation of new or expanded wastewater facilities, construction or expansion of such facilities would be subject to project-level environmental review in accordance with CEQA at the time it is proposed. Therefore, impacts to wastewater would be less than significant.

Stormwater Drainage

Stormwater facilities are operated and maintained by the City's Public Works Department. Existing stormwater infrastructure would be able to accommodate post project stormwater flows considering existing requirements for detention and on-site infiltration. Although future development would require connection to existing stormwater facilities, localized stormwater infrastructure improvements would be evaluated upon submittal of project specific development plans. All future project applications, whether discretionary or ministerial would be required comply with relevant federal, State, and local stormwater drainage regulations, including but not limited to the City's General Plan Public Facilities Element, NPDES MS4 Permit requirements under the Clean Water Act Section 402, and the

Colorado River Basin Regional Water Quality Control Board stormwater regulations. Compliance with these requirements would reduce stormwater pollution and urban runoff. Therefore, impacts to stormwater drainage would be less than significant.

Electricity, Natural Gas, and Telecommunications

Development anticipated in the Rezone Sites would occur within areas of the City that are already served by existing electrical, natural gas, and telecommunications utility infrastructure, provided by existing service providers (IID, SoCalGas, and private carriers). Development facilitated by the project would generally have access to utility infrastructure and would not require the installation of substantial natural gas, electrical, or telecommunication infrastructure to meet increased demands. However, individual development may require provision of new and upgraded utility infrastructure such as powerline or pipeline upgrades and new connections. New meter and service connections would be coordinated with the provider at the time that the new development is proposed. All future project applications, whether discretionary or ministerial would be required to comply with all relevant federal, State, and local regulations that would check for consistency during the City's review for each individual project. Therefore, impacts to electricity, natural gas, and telecommunications would be less than significant.

Summary

The proposed project is a planning-level action that establishes the policy and regulatory framework for future development but does not approve specific development projects. Future development facilitated by the proposed project may increase demand for water, wastewater, stormwater, solid waste, electrical, natural gas, and telecommunications facilities; however, such development would generally occur within urbanized areas served or planned to be served by existing public infrastructure and would be subject to the City's development review process to ensure adequate utility service and facility capacity.

As such, the implementation of the proposed project would not require or result in the relocation or construction of new and expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The impact of the proposed project with respect to water, wastewater, stormwater infrastructure, electricity, natural gas, and telecommunications would be less than significant.

4.14.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.14.5.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.14.6 Issue 2: Water Supply

Would the project not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

4.14.6.1 Impact Analysis

The proposed Housing Element and associated rezoning actions are planning-level actions that establish land use policy and zoning but do not approve or authorize specific development projects. The Housing Element itself does not authorize construction of housing or increase water demand beyond that associated with future discretionary development projects. For the sake of this analysis, the proposed project water demand is estimated based on the project's assumed population and anticipated industrial development acreage. As shown in Table 4.14-1 Project Water Demand, based on the project's anticipated population, the proposed project would result in a water demand of approximately 1,190 MGY at full buildout in 2050, without assuming a reduction in consumption rate.

Table 4.14-1 Project Water Demand

Project Land Use Type	Input	Usage Factor	Net New Water Use (MGY)
Residential	22,133 persons	53,290 MGCY[1]	1,179
Industrial	649,999 building square feet	17.53GY/SF[2]	11
Total			**1,190**

Notes:
[1] The residential usage factor is based on the UWMP Average consumption rate from 2011 to 2015 = 146 gallons per capita per day, multiplied by 365 days for the millions of gallons per capita per year (MGCY).
[2] The industrial usage factor is based on a collection of industrial and warehouse case studies water generation rates for gallons per year per square foot (GY/SF).

Because the increase in population associated with the project would be consistent with the anticipated population increase analyzed in the UWMP, the associated project water demand is also within the UWMP's water demand shown in Table 4.14-2 Calexico Water Supply Availability & Demand Projections, Normal and Dry Years.

Table 4.14-2 Calexico Water Supply Availability & Demand Projections, Normal and Dry Years

	2030	2035	2040	2045
Water Service Population	49,075	53,165	57,254	61,344

	2030	2035	2040	2045
Normal Year				
Projected Supply (MGY)	2,920	2,920	2,920	2,920
Projected Demand (MGY)	2,492	2,632	2,764	2,887
Supply-Demand	428	288	156	33
Single Dry Year				
Projected Supply (MGY)	2,920	2,920	3,285	3,285
Projected Demand (MGY)	2,617	2,764	2,902	3,032
Supply-Demand	731	444	539	286
Multiple Dry Year				
Projected Supply (MGY)	2,920	2,920	2,920	2,920
Projected Demand (MGY)	2,577	2,390	2,390	2,390
Supply-Demand	343	530	530	530

Source: Calexico 2022, UWMP Tables 7.1, 7.2, 7.3

As shown in Table 4.14-2 Calexico Water Supply Availability & Demand Projections, Normal and Dry Years, the City is anticipated to have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. The City's UWMP (adopted 2022) governs the City's water supply and reliability during normal, single dry, and multiple dry years. Because the 2022 UWMP is the latest published version, the projections included are through 2045. As future updates of the UWMP are prepared every five years, they will present updated development numbers and account for the latest population and housing projections.

Actual water demand associated with future development would likely occur over an extended timeframe and would be evaluated through subsequent project-level review. Future development projects would be subject to applicable water supply regulations, including Water Code Sections 10910 et seq. (SB 610) and Government Code Section 66473.7 (SB 221), where applicable. The City's General Plan directs the City to evaluate

available potable water capacity during development review (Safety Element, Potable Water Policy 3a). Future projects must also show compliance with the approved UWMP and other Calexico Municipal Code requirements. The Calexico Municipal Code further provides that water service is subject to City requirements and reserves the City's authority to limit water service when necessary in the interest of public health and safety (CMC §13.01.060). In addition, whenever the City Council determines by resolution that water use must be limited, it is unlawful to violate those water use restrictions (CMC §13.01.450). Additionally, water conservation requirements under Title 24 (CALGreen), Senate Bill 606 and Assembly Bill 1668, and Senate Bill X7-7 reduce per capita water demand through mandatory efficiency standards for indoor and outdoor uses. These statewide regulatory frameworks, combined with existing City conservation programs and IID efficiency measures, further support long-term supply reliability.

If additional water supply or system capacity is needed to serve future development beyond that evaluated in the current UWMP, such needs would be evaluated through subsequent UWMP updates and in coordination with the Imperial Irrigation District (IID), consistent with IID's water service policies, water conservation programs, and applicable procedures governing municipal and industrial water service.

Therefore, implementation of the proposed project would not, by itself, result in insufficient water supplies during normal, single dry, or multiple dry years. Future development would remain subject to the City's development review procedures, applicable water supply regulations, the City's UWMP, and other applicable State and local water conservation requirements. Therefore, impacts related to the availability of sufficient water supplies for foreseeable future development during normal, dry and multiple dry years would be less than significant.

4.14.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.14.6.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.14.7 Issue 3: Wastewater Treatment

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

4.14.7.1 Impact Analysis

As mentioned in Section 4.14.1.2, Wastewater Treatment System, the City of Calexico owns and operates a municipal wastewater collection and treatment system that is regulated under the State Water Resources Control Board and the Colorado River Basin Regional Water Quality Control Board. Wastewater flows are treated at the City's Wastewater Treatment Plant, which operates under applicable discharge requirements and permit conditions. Per the 2022 UWMP, the City's WWTP receive an average wastewater flow of 2.5 million gallon a day (MGD), or 912.5 million gallon per year (MGY), but has a daily capacity of the WWTP is 4.3 MGD, or 1,569.5 MGY (City of Calexico, 2022). This leaves an existing available capacity of 657 MGY.

As discussed in Section 4.11, Population and Housing, the proposed project would result in approximately 22,133 residents by the horizon year of 2050. To calculate the number of employees that could result from the proposed Bowker site rezone, the net acreage (3.33 acres) is multiplied by 20 employees per acre, based on the City's 2013 Design Procedure and Improvement Standards Appendix H, resulting in approximately 666 employees. As shown in Table 4.14-3 Project Wastewater Demand, the estimated proposed project wastewater generation is 577.65 MGY.

Table 4.14-3 Project Wastewater Demand

Land Use Type	Quantity	Wastewater Generation Factor	Wastewater Generation (MGD)	Wastewater Generation (MGY)
Residential	5,794 units x 3.82 persons per household = 22,133 residents	70 gpd per person	1.55	565.50
Industrial	33.3 net acres x 20 employees/acre = 666 employees	50 gpd per person	0.03	12.15
Total			**1.61**	**577.65**

Note: Wastewater generation factors were based on the 2022 UWMP and the 2013 Design Procedure and Improvements Standards Appendix H

As discussed in Issue 2, the increase in population associated with the proposed project would be consistent with the anticipated population increase analyzed in the UWMP. As such, the associated project wastewater demand falls within the projected flow in 2045 of 1,694 MGY from the UWMP and would fall within the WWTP operating capacity of 1,569.5 MGY.

The UMWP identifies the need to expand and rehabilitate the City's WWTP during the UWMP planning horizon to accommodate long-term Citywide growth and maintain adequate service levels, however these improvements are intended to serve cumulative growth projected through 2045 rather than address a deficiency created by the proposed project. The City's 2024-2025 five-year Capital Improvement Program allocates funds for 2024-through 2026 for "Wastewater Plant Expansion/Upgrade".

Future development under the proposed project would be required to comply State and local wastewater regulations such as the CALGreen Code, which requires that new construction use high-efficiency plumbing fixtures, and the Statewide General Waste Discharge Requirements that prevent sanitary sewer overflows. Furthermore, future development would be required to connect to existing sewer infrastructure or fund necessary expansions through development impact fees and project-specific improvements. Therefore, implementation of the proposed project would have a less than significant impact with respect to wastewater treatment capacity.

4.14.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.14.7.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.14.8 Issue 4 and 5: Solid Waste

Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Would the project not comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

4.14.8.1 *Impact Analysis*

Solid waste services in Calexico are provided by the City's solid waste management system. The City participates in regional solid waste collection and disposal systems that serve Imperial County and relies on permitted regional landfill facilities with capacity to serve existing and projected populations. According to CalRecycle Solid Waste Information Systems (SWIS), Imperial County has ten active and permitted waste/landfill facilities. As discussed in Section 4.14.1.5, Solid Waste, Calexico is serviced by the Calexico Solid Waste Site and Imperial Landfill, which have a combined remaining capacity of 13,949,078 cubic yards.

Construction completed as part of proposed project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Per CALGreen, 65 percent of construction and demolition waste must be diverted from landfills. As such, at least 65 percent of all construction and demolition debris from the proposed project would be diverted. Any hazardous wastes that are generated during construction activities, such as used motor oil, empty paint cans, or empty solvent containers, would be managed and disposed of in compliance with all applicable federal, State, and local laws. The remaining 35 percent of construction and demolition material that is not required to be recycled would either be disposed of or voluntarily recycled at a solid waste facility with available capacity. Additionally, construction activities associated with future development would be subject to project-level permit conditions as well as C&D reuse/recycling plan and diversion requirements per Section 8.38.080 of the City's Municipal Code. The City of Calexico enforces CALGreen standards related to material conservation and resource efficiency.

During operations, development facilitated by the proposed project would be required to comply with existing solid waste reduction requirements, including applicable federal, State and local solid waste statutes and regulations during operation. Compliance with existing policies and regulations, including the CALGreen building and State recycling and organic material diversion requirements, would reduce the non-renewable sources of solid waste, and minimize the solid waste disposal from development under the project.

Although a precise quantity of construction and demolition debris cannot be specifically determined at this time, mandatory compliance with all applicable State and local regulations governing solid waste, source reduction, and recycling would reduce the amount of construction waste entering landfills. As a result, construction and operation of development projects facilitated by the proposed project are not expected to generate substantial amounts of solid waste. Additionally, implementation of the proposed project would not conflict with or impede compliance with applicable solid waste statutes or regulations.

4.14.8.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.14.8.3 Significance After Mitigation

Impacts would be **less than significant**. No mitigation is required.

4.15 Wildfire

This section evaluates potential impacts to wildfire that could result from implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description. The proposed project also includes the rezone of the Bowker site, APN 059-180-029, from Residential Condominium (RC) to Industrial (I). This analysis considers existing potential wildfire conditions and whether implementation of the proposed project would impair emergency response or evacuation plans, expose the community to wildfire-related pollutants or spread of wildfire, require infrastructure that may increase wildfire risk, or result in adverse impacts associated with post-fire conditions.

4.15.1 Existing Conditions

4.15.1.1 Regional Setting and Climate

The City of Calexico is located in southern Imperial County along the United States-Mexico border. The region experiences a hot desert climate characterized by extremely hot summers, mild winters, low annual precipitation, and high evapotranspiration rates. Average summer high temperatures commonly exceed 100°F, while winter daytime temperatures generally range from the upper 60s to low 70s. Annual precipitation averages less than three inches and occurs primarily during winter storm events, with occasional summer desert monsoon and thunderstorm activity.

Calexico's climate is influenced by its location within the Imperial Valley and the broader Sonoran Desert region, where subtropical high-pressure systems, low elevation, and inland desert conditions contribute to persistent aridity and extreme heat. Towering coastal and transverse mountain ranges to the west create a rain shadow effect that limits Pacific moisture intrusion into the region.

Wind conditions are also a defining climatic characteristic of the area. Prevailing winds generally originate from the west and northwest, with average wind speeds ranging from approximately 7 to 12 miles per hour. Periodic high-wind events during the spring and summer can produce winds gusts up to 40-50 mph, which blow dust, reduce visibility, and degrade air quality throughout Imperial Valley.

4.15.1.2 Vegetation and Fire History

Calexico's topography is extremely flat and devoid of any significant elevation changes, sitting at an elevation of about three feet above sea level. Land cover within Calexico is primarily characterized by urban development and agricultural uses. Urbanized areas comprise approximately 60 percent of the City, while irrigated row and field crops account for approximately 14 percent. Additional land cover types present within City limits include

alkali desert scrub, riverine, desert riparian, lacustrine, freshwater emergent wetland, and barren land areas (CDFW, 2026). As further defined in the following sections, vegetation communities associated with the New River corridor, primarily riparian, desert riparian, and alkali desert scrub habitats, are located within the California Department of Forestry and Fire Protection (CAL FIRE) designated Moderate Fire Hazard Severity Zone (MFHSZ) and California State-designated Wildland-Urban Interface (WUI) boundary (CAL FIRE, 2025). Despite the presence of both the MFHSZ and WUI-designated areas along the New River, there are no documented recent or historic wildfire events within or immediately adjacent to Calexico according to available California Department of Forestry and Fire Protection records (CAL FIRE, 2026).

4.15.1.3 Fire Hazard Severity Zones

The Office of the State Fire Marshal designates Fire Hazard Severity Zones (FHSZs) throughout California as Moderate, High, or Very High based on factors including fuel loading, slope, fire weather, and fire history. Responsibility-area designations identify which level of government has primary financial responsibility for preventing and suppressing wildland fires. Within a State Responsibility Area (SRA), the State has primary financial responsibility for wildland fire protection, generally through CAL FIRE. Within a Local Responsibility Area (LRA), that responsibility rests primarily with the applicable city, county, or local fire protection district.

The City of Calexico is located entirely within a LRA. An LRA designation does not mean that an area has no wildfire hazard; FHSZs are also identified within LRAs based on the physical conditions affecting potential fire behavior. As shown in Figure 4.15-1: Wildfire hazard Severity Zones, only a small portion of City along the New River is classified as a Moderate Fire Hazard Severity Zone (MFHSZ). Specifically, housing sites 37-41 and 50-52 fall within the MFHSZ. The rest of the City is not located within a FHSZ, as existing urban development patterns, relatively flat topography, and limited native vegetation reduce the potential for large wildfire events within city limits.

4.15.1.4 Wildland Urban Interface (WUI)

The Wildland-Urban Interface (WUI) refers to areas where urban development transitions to undeveloped lands that may contain vegetation capable of supporting wildfire. These areas are often located along the edges of communities where residential, commercial, industrial, agricultural, and open space land uses meet. CAL FIRE identifies WUI areas using a combination of housing density, Fire Hazard Severity Zone (FHSZ) classifications, and vegetation characteristics as part of its Fire and Resource Assessment Program (FRAP).

WUI designations include Interface, Intermix, and Influence Zone, which are defined based on housing density classes. California commonly classifies WUI areas into three categories:

- **Interface WUI**: Developed areas located adjacent to wildland vegetation. In these areas, neighborhoods and urban development are concentrated, but are directly next to vegetation that can support wildfire.
- **Intermix WUI**: Areas where homes and other development are interspersed throughout wildland vegetation. In these areas, structures and combustible vegetation are mixed together, often resulting in greater exposure to wildfire.
- **Influence Zone:** Areas located near Interface or Intermix WUI areas that may still be affected by wildfire through ember cast, smoke, emergency access constraints, or other indirect wildfire hazards, even though they do not meet the criteria for Interface or Intermix classifications.

All three WUI designations are found within Calexico along the southeastern edge of the City and generally overlap with the MFHSZ. As shown in Figure 4.15-2: Wildland Urban Interface Zones, several housing sites 37–41 and 50–52 are completely or somewhat within Calexico's mapped WUI area.

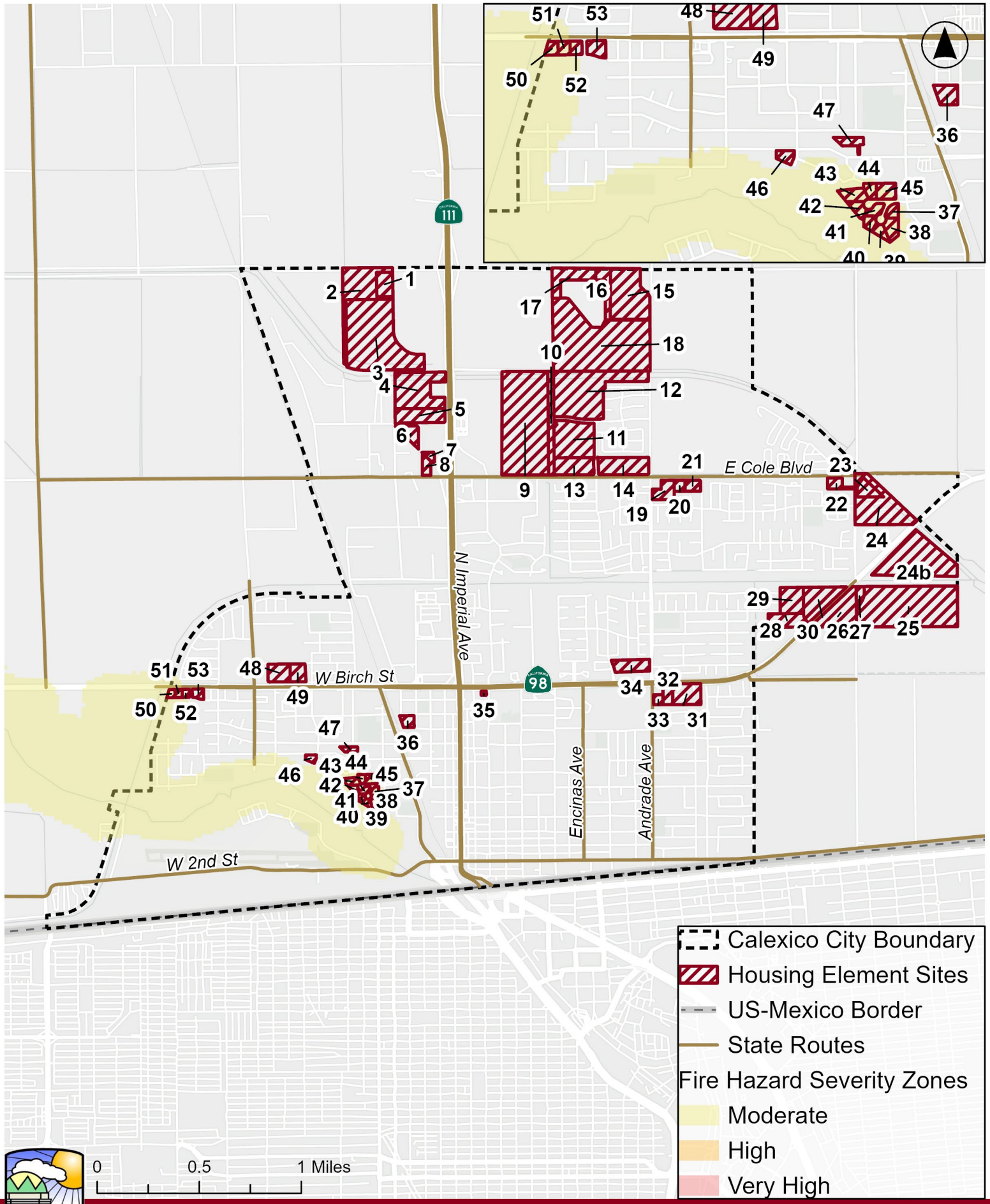


Figure 4.15-1:
Wildfire Hazard Severity Zones

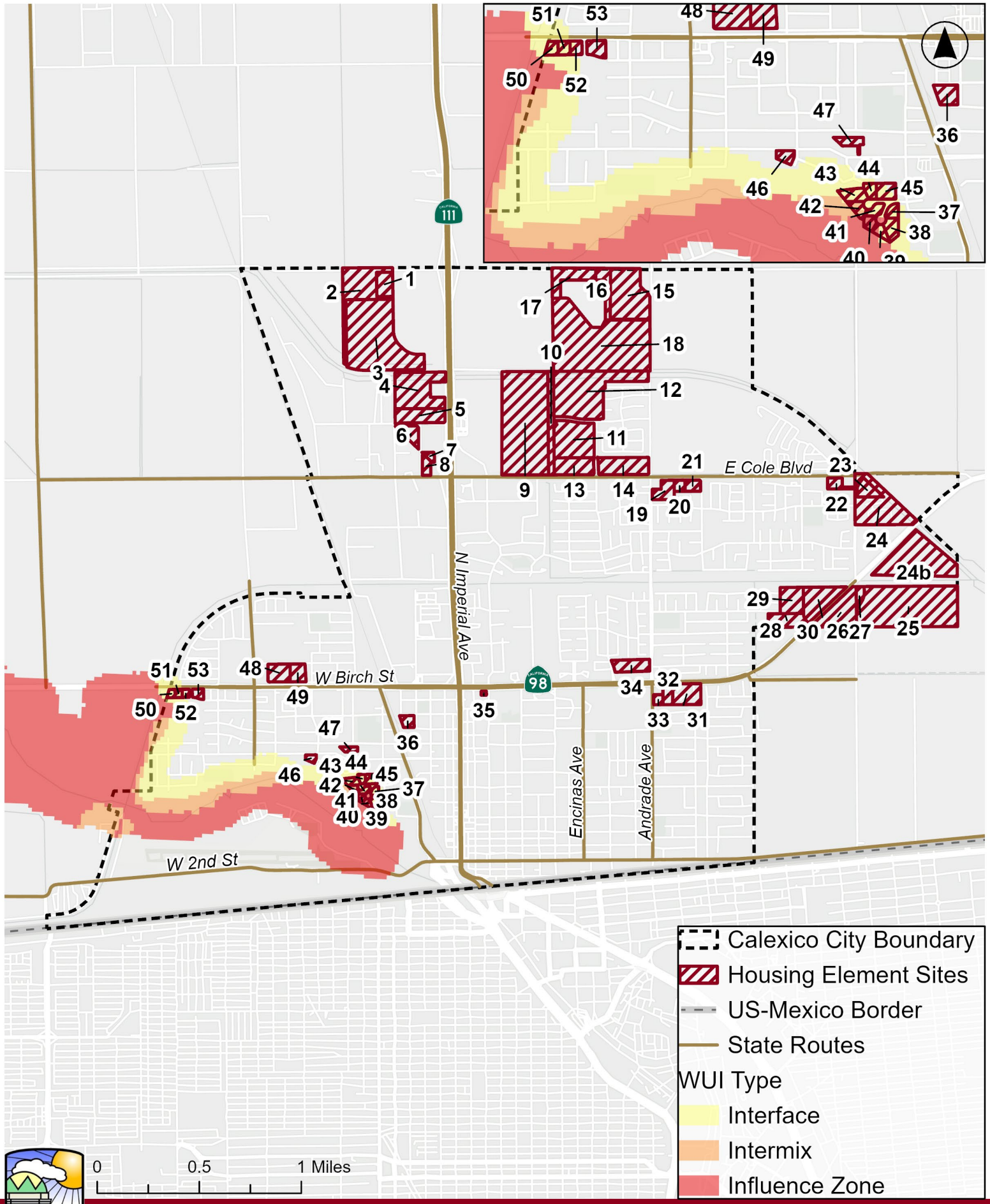


Figure 4.15-2:
Wildfire Urban Interface Zones

4.15.2 Regulatory Framework

4.15.2.1 Federal

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. The intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The National Fire Plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

International Building Code and International Fire Code

The International Building Code and International Fire Code are model codes developed by the International Code Council to regulate fire safety in buildings. The International Building Code focuses on building design and construction, while the International Fire Code addresses fire prevention, fire protection, and life safety in both new and existing buildings. Both codes work together to safeguard life and property from fire and explosion hazards.

International Wildland-Urban Interface Code

The International Wildland-Urban Interface Code (IWUIC) establishes requirements for land use and the built environment within designated Wildland Urban Interface (WUI) areas using prescriptive and performance provisions. The IWUIC establishes minimum special regulations for the safeguarding of life and property from the intrusion of wildfire and:

- Regulates ignition-resistant construction techniques and defensible space as well as fire department access and available water supplies for fire suppression.
- Focuses on preventing ignition of buildings and vegetative fuels from direct exposure to wildfire and fire exposure from adjacent structures.
- Helps prevent structure fires in the WUI from spreading to wildland fuels, even in the absence of fire department intervention.

Federal Emergency Management Agency (FEMA)

FEMA administers emergency preparedness, hazard mitigation, and disaster response programs throughout the United States. FEMA supports wildfire hazard mitigation planning and coordinates post-disaster recovery efforts associated with wildfire events.

4.15.2.2 State

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE is responsible for wildfire prevention and suppression activities throughout State Responsibility Areas (SRAs) and prepares Fire Hazard Severity Zone maps pursuant to Government Code Sections 51175–51189, as noted above. CAL FIRE provides varied

emergency services to 36 counties via contracts with local governments, including the City of Calexico. CAL FIRE's Fire Prevention Program consists of multiple activities, including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement.

CAL FIRE also plays an important role in local land use planning through its review and approval authority over the Safety Element of a jurisdiction's General Plan. Pursuant to Government Code Sections 65302(g) and 65302.5, cities and counties located within or adjacent to State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZs) are required to submit Safety Element updates to CAL FIRE for review. CAL FIRE evaluates whether the Safety Element adequately addresses wildfire hazards, emergency evacuation, fuel management, and strategies to reduce risks to life and property. Local jurisdictions, such as Calexico, must incorporate these recommendations or reach agreement with the agency before adopting or amending the Safety Element, thereby ensuring that land use decisions are informed by current wildfire risk considerations and State fire protection standards.

Office of Emergency Services

The California Governor's Office of Emergency Services is responsible for coordinating overall State agency response to disasters; ensuring the State's readiness to respond to and recover from all hazards; and assisting local governments in their emergency preparedness, response, recovery, and mitigation.

California Public Resources Code

Under California Public Resources Code (PRC) Sections 4201–4204 and Government Code Sections 51175–51189, California Department of Forestry and Fire Protection is responsible for identifying and mapping Fire Hazard Severity Zones (FHSZs) within State Responsibility Areas and Local Responsibility Areas based on factors such as vegetation, topography, fire weather, and fuel loading. Designations are based on factors such as fuel conditions, topography, weather, and wind patterns. FHSZ classifications are used to guide the implementation of wildfire risk reduction and fire protection measures. Areas designated as high or very high fire hazard severity zones are generally subject to additional fire hazard analysis and implementation of defensible space, emergency access, and other wildfire protection measures intended to reduce wildfire risk and improve community resilience.

Government Code Section 66474.02, enacted through Senate Bill 1241, establishes additional fire safety requirements for subdivisions located within Very High FHSZs or State Responsibility Areas (SRAs). Before approving a tentative subdivision map, a city or county must find that the proposed subdivision complies with defensible space requirements, will

have access to publicly funded structural fire protection services, and provides adequate emergency access and evacuation routes consistent with applicable fire safety standards.

PRC Section 4290 establishes minimum fire safety standards for development in SRAs, including requirements for emergency access, road design, signage, water supply, and fuel modification. These standards are intended to reduce wildfire risk and support emergency response for new development.

PRC Section 4290.5 requires local agencies to submit certain development proposals located within State Responsibility Areas to CAL FIRE for review and comment. The review helps ensure that proposed projects are consistent with applicable wildfire protection and fire safety standards.

PRC Section 4291 requires property owners in designated fire hazard areas to maintain defensible space around structures through vegetation management and fuel reduction. The purpose of the requirement is to reduce wildfire intensity near buildings and improve firefighter access and safety.

PRC Section 4427 authorizes CAL FIRE to provide financial assistance and grants for activities that reduce wildfire risk, including fuel reduction, forest health, and fire prevention projects. These programs support statewide efforts to improve community wildfire resilience.

PRC Section 4741 limits the ability of homeowners associations (HOAs) to prohibit homeowners from complying with State defensible space and vegetation management requirements. The statute helps ensure that wildfire risk reduction measures can be implemented even where HOA landscaping restrictions exist.

Legislative Amendments

California Senate Bill (SB) 1241 (2012) amended Government Code Section 65302 to strengthen wildfire planning requirements within local general plans. SB 1241 requires cities and counties that contain State Responsibility Areas or Very High Fire Hazard Severity Zones to address wildfire risks in the safety element of their general plans and to review and update those elements as necessary upon each housing element revision. The legislation also requires consultation with California Department of Forestry and Fire Protection and other fire protection agencies to ensure wildfire hazards, evacuation constraints, emergency access, and fire protection measures are adequately considered in local planning decisions.

AB 3074 (2020) amended Public Resources Code Section 4291 and directed the California Board of Forestry and Fire Protection to establish an ember-resistant zone within the first five feet of structures, commonly referred to as Zone 0.

AB 261 (2025) updates provisions governing Fire Hazard Severity Zone classifications and responsibilities of the State Fire Marshal regarding wildfire hazard mapping.

SB 629 (2025) amends Government Code and Public Resources Code provisions related to wildfire planning, Fire Hazard Severity Zones, and local safety planning requirements. SB 629 expanded State wildfire planning requirements and further integrated wildfire hazard considerations into local safety planning and hazard mapping.

California Building Code and California Fire Code

The California Building Standards Code (Title 24 of the California Code of Regulations) establishes minimum fire and life safety standards for structures throughout the State. The California Fire Code includes requirements related to emergency access, fire apparatus access roads, hydrant spacing, fire flow capacity, and fire protection systems. Section 503 of the California Fire Code establishes minimum standards for fire apparatus access roads, including roadway widths, turning radii, and access clearances.

Future development facilitated by the Housing Element would be required to comply with applicable California Building Code (CBC) and California Fire Code (CFC) requirements during project-level review.

California Health and Safety Code, Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

2024 California Fire Plan

The California Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The plan serves as the State's road map for reducing the risk of wildfire by emphasizing preventive action before a fire starts. The California Fire Plan reduces firefighting costs and property losses, increases firefighter safety, and contributes to ecosystem health.

California State Multi-Hazard Mitigation Plan

The California State Multi-Hazard Mitigation Plan (SMHMP) identifies natural and human-caused hazards that threaten California and establishes statewide strategies to reduce risk and improve community resilience. The plan evaluates wildfire hazards and vulnerabilities throughout the State and provides guidance for hazard mitigation, emergency preparedness,

and long-term recovery efforts. The SMHMP also serves as the framework for coordinating State, regional, and local hazard mitigation planning activities.

California Wildland-Urban Interface Code

The California Wildland-Urban Interface (WUI) Code is a new, consolidated set of wildfire safety regulations adopted into Title 24, Part 7 of the California Building Standards Code. It became effective January 1, 2026, and is based on the 2024 IWUIC with California-specific amendments. Th WUI establishes minimum standards for the design, construction, and maintenance of buildings located in areas at elevated risk of wildfire. The code includes requirements for ignition-resistant construction materials, defensible space, vegetation management, access and water supply provisions, and other measures intended to reduce the vulnerability of structures to wildfire and improve firefighter safety during emergency response. Requirements for WUI areas are located in Part 7 of the California Wildland-Urban Interface Code, section 102.13. As shown in Figure 4.15-2. housing sites (sites 37-41 and 50-52) intersect with the City's wildland-urban interface (WUI) boundary.

4.15.2.3 Regional

Imperial County Operational Area Emergency Plan

Imperial County maintains the Operational Area Emergency Plan (OAEP) to coordinate regional emergency preparedness, response, and evacuation activities for wildfire and other hazard events. The OAEP establishes emergency management procedures, interagency coordination protocols, mutual aid systems, evacuation procedures, and incident command responsibilities consistent with the California Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS).

Imperial County Hazard Mitigation Plan

The 2021 Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) identifies natural and human-caused hazards affecting the region and establishes mitigation strategies intended to reduce risks to public safety, infrastructure, and property. The MHMP evaluates hazards including wildfire, flooding, extreme heat, drought, and seismic events, and includes mitigation measures such as emergency preparedness planning, fuel management, infrastructure improvements, defensible space practices, and interagency coordination. The MHMP also supports regional eligibility for hazard mitigation funding through FEMA. According to Table 25 of the MHMP, the City of Calexico has a medium probability of experiencing wildfire; however, the anticipated severity of wildfire impacts within the City is considered low. Section 5.5.8.3 of the MHMP reiterates that Calexico has a low risk of wildfire due to limited fuel sources. If a wildfire were to occur, the Downtown area would be most vulnerable because of its concentration of older wood-frame structures.

Section 5.5.8.3 of the MHMP sets forth the City of Calexico's goals, objectives, and policies related to fire hazards:

Goal 1: Wildfire: Vegetative Maintenance and Cleaning

Objective 1: Reduce the impact of wildland fire to infrastructures.

Objective 2: To mitigate access issues and improve survivability.

Objective 3: Minimize the potential hazards to public health, safety, and welfare and prevent the loss of life and property damage from natural and human induced phenomena.

Policy 3

a. The City shall ensure the adequacy of existing emergency preparedness plans to handle effectively and efficiently known hazards and emergencies.
b. The City shall review evacuation procedures to make sure that in case of an evacuation, the residents of Calexico will be quickly notified and that the evacuation will be orderly.
c. The City shall work with the Calexico Water Department to ensure that an adequate supply of water will be available in the event of an emergency and to help create and maintain an emergency water supply.
d. The Calexico Fire Department should review and update the need for additional fire hydrants and shall work with the Calexico Water Department to ensure that adequate water pressures for fire flows are maintained.
e. The City shall require the heads and staff of each department to participate in the maintenance of a city-wide emergency preparedness plan.

4.15.2.4 Local

Calexico General Plan

The City of Calexico's adopted Safety Element identifies the transportation network as a critical component of emergency response and evacuation. Section 8.2.6 notes that the City's major evacuation routes are State Route (SR) 111, SR 98, and Interstate 8, and that all primary local streets connect to the county roadway system outside the City, providing multiple evacuation options during emergencies. The City's 2015 Draft Safety Element is anticipated to be updated to address current State requirements related to climate adaptation, wildfire, and emergency evacuation planning and adopted concurrently with or subsequent to the Land Use Element Update. In addition, the Circulation Element identifies SR 111 as the City's primary north-south transportation corridor and SR 98 as the primary

east-west corridor, both of which serve important functions for regional connectivity, emergency access, and evacuation.

Calexico Fire Department

The City of Calexico is served by the Calexico Fire Department (CFD), which provides fire suppression, emergency medical response, rescue services, hazardous materials response, and public safety education throughout the community. The Fire Department plays a critical role in protecting life and property and serves as a primary responder during natural disasters, transportation incidents, and other emergency events. In addition to emergency response, the Department supports disaster preparedness efforts through emergency planning, coordination with regional response agencies, and participation in the City's emergency management activities. Additional information about the CFD, as well as locations of fire stations within Calexico, is described in Chapter 4.12, Public Services and Recreation, section 4.12.1.1.

Calexico Municipal Code

Title 17 - Zoning Ordinance

The City of Calexico Zoning Ordinance establishes setbacks which provide safe access around buildings associated with all types of land uses.

Title 15 – Buildings and Construction

Title 15 of the City's Municipal Code outlines the City's building and construction regulations. It governs local construction practices, safety standards, and property modifications within the City. Chapter 15.20, Fire Prevention Code, establishes local fire safety regulations and incorporates applicable provisions of the California Fire Code. The Fire Prevention Code provides standards for fire apparatus access, emergency vehicle circulation, fire hydrant placement, premises identification, operational permits, inspections, and other fire protection measures intended to reduce risks to life and property. The Code is administered and enforced by the CFD through plan review, inspections, code enforcement, and fire prevention activities.

Calexico Fire Department

As discussed in Section 4.11, Public Services and Recreation, the CFD consists of one (1) Fire Chief, five (5) Fire Captains, five (5) Firefighter Engineers, 15 Firefighters, one (1) Fire Inspector, and one (1) Administrative Assistant to collectively provide administrative and operational control of the department. The CFD is an all-risk emergency response agency.

4.15.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines, wildfire impacts would be considered significant if the project would:

1) Threshold 1: Substantially impair an adopted emergency response plan or emergency evacuation plan.
2) Threshold 2: 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.
3) Threshold 3: Require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing environmental impacts.
4) Threshold 4: 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.

4.15.4 Methodology

The wildfire analysis evaluates the location and characteristics of the proposed project relative to CAL FIRE Fire Hazard Severity Zones, existing development patterns, topography, roadway access, presence of critical infrastructure (fuel breaks, emergency water sources, power lines, and other utilities), emergency response capabilities, and wildfire risk factors. The analysis also evaluates the effects of the project on emergency planning and evacuation in the event of a wildfire or other natural hazard, as well as any conflicts with existing emergency plans and policies. The analysis contained herein addresses potential wildfire risks from a programmatic-level and Citywide approach, recognizing that the project will not directly result in construction or new development. Rather, future individual projects at various sites around the City would be facilitated by the project. Individual projects would be subject to all governing Federal, State, and local statutes, codes, and plans related to fire hazard planning and preparedness and undergo project-specific review at the time of each development application.

4.15.5 Issue 1: Emergency Response and Evacuation Plans

Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

4.15.5.1 Impact Analysis

Implementation of the proposed project would facilitate future residential development and associated rezoning activities within existing urbanized areas of Calexico. Housing sites are located within areas currently served by existing roadway networks and emergency access routes. As discussed in Section 4.11, Population and Housing, implementation of the

Housing Element would accommodate planned population growth and the City's Regional Housing Needs Allocation (RHNA), which could incrementally increase demand for fire protection, emergency medical services (EMS), and emergency response infrastructure.

The proposed project does not approve specific development projects or include physical improvements that would alter roadway circulation, emergency access, or evacuation routes. Although several housing sites (sites 37-41 and 50-52) are located near the wildland-urban interface (WUI) boundary, these sites consist of vacant or underutilized parcels within the existing urbanized footprint of Calexico and are surrounded by developed areas, roadways, and public infrastructure. Development of these sites would not extend urban development into remote wildland areas or create new isolated neighborhoods with limited evacuation access.

Future residential development could incrementally increase traffic volumes and population within the City, which may increase demand on the transportation network used for emergency response and evacuation. However, the Housing Element sites are located within the existing urbanized area and are served by the City's established roadway network. In particular, housing sites 37 through 41 and 50 through 52, which are located near the City's mapped wildland-urban interface (WUI) area, consist of vacant parcels proposed for rezoning from Industrial (I) or Commercial Highway (CH) to Residential Apartments (RA) and are already accessible from existing public roadways. Development of these sites would not create isolated development patterns, rely on a single point of access, or require extension of roadways into undeveloped WUI areas.

Future development facilitated by the proposed project would be subject to the City's development review and permitting process, including review by the CFD. All construction activities would be performed according to CFD standards and required to comply with applicable provisions of the California Government Code, California Building Code, California Fire Code, California Public Resources Code, and the City of Calexico Fire Prevention Code. Development projects would be required to demonstrate adequate fire apparatus access, emergency vehicle circulation, roadway widths, turning radii, fire flow capacity, hydrant spacing, and other fire protection measures necessary to serve the proposed development during both construction and operation. In addition, future development would be required to provide adequate on-site and off-site access for emergency vehicles and services and demonstrate consistency with applicable emergency access standards. Implementing development facilitated by the Housing Element would also be required to demonstrate consistency with applicable goals and policies of the HMHP related to fire hazards and emergency preparedness. Evacuation and emergency access within Calexico primarily rely on State Route (SR) 111, SR 98, and Interstate 8, with SR 111 serving as the City's primary north-south corridor and SR 98 and Interstate 8 providing the

primary east-west regional connections. Accordingly, future development would continue to utilize the City's existing circulation network and would not substantially impair emergency response or evacuation capabilities.

4.15.5.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.15.5.3 Significance After Mitigation

Impacts would remain **less than significant**.

4.15.6 Issue 2: Wildfire

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

4.15.6.1 Impact Analysis

The City of Calexico is characterized by flat topography surrounded by agriculture and irrigated lands. Wind patterns typically consist of calm to mild breezes from the west, and although stronger gusts of wind can occur during seasonal storms, high wind speeds are rare and infrequent. As shown in Figure 4.15-1, Wildfire Hazard Severity Zones, there are no High or Very High Fire Hazard Severity Zones within the City as identified by CAL FIRE. Only Moderate High Fire Hazard Severity Zones are present within the City, and overlap with sites 37 through 41 as well as 50 through 52. Similarly, as shown in Figure 4.15-2, sites 37 through 41 as well as 50 through 52 intersect with the WUI designated areas. Given the relatively minimal elevation changes within the City, the absence of extensive wildfire hazard areas, the lack of surrounding vegetative fuels, and the location of the housing sites within the existing urbanized area, implementation of the proposed project would not introduce development into remote WUI areas or substantially increase wildfire fuel conditions.

Future development facilitated by the Housing Element would primarily occur on infill, vacant, or underutilized urban parcels surrounded by existing development and infrastructure. Implementation of the proposed project has the potential to place future development within wildfire-prone areas; however, State law requires new development to adhere to fire-resilient design standards, including defensible space, fire-resistant building materials, emergency access, and evacuation planning. Any new development projects would be subject to regional goals and policies related to emergency preparedness, including those in the City General Plan Safety Element and Imperial County 2021 MHMP. Policies 3a-b of the MHMP pertain to the City of Calexico and state that, “a) The City shall ensure the adequacy of existing emergency preparedness plans to handle effectively and efficiently known hazards and emergencies; b) The City shall review evacuation procedures

to make sure that in case of an evacuation, the residents of Calexico will be quickly notified and that the evacuation will be orderly".

These policies ensure that future development is designed and managed to reduce fire hazard potential and protect public safety. Additionally, future development projects would be required to comply with applicable California Fire Code standards related to fire flow capacity, hydrant distribution, fire apparatus access, aerial access, and fire suppression systems. These requirements are intended to improve emergency response capabilities and reduce the potential for fire ignition and uncontrolled fire spread. Future projects would also be subject to review and approval by the City Building Official and Fire Marshal to ensure compliance with applicable fire protection requirements. Given the urbanized nature of the housing sites, the absence of significant topographic constraints, and compliance with applicable fire protection standards, development facilitated by the Housing Element would not increase wildfire intensity, rates of spread, or the potential for project occupants to be exposed to wildfire smoke or the uncontrolled spread of wildfire. With incorporation of existing Federal, State, and local regulatory requirements for development, implementation of the proposed project would result in a less than significant impact related to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

4.15.6.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.15.6.3 Significance After Mitigation

Impacts would remain **less than significant**.

4.15.7 Issue 3: Infrastructure

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

4.15.7.1 Impact Analysis

Implementation of the proposed project would facilitate future residential development and associated population growth, which could increase demand for supporting infrastructure such as local roadways, water distribution facilities, electrical service, telecommunications infrastructure, and fire protection facilities. Future development may also require the installation, expansion, or ongoing maintenance of utility infrastructure necessary to serve new residential uses.

However, the project does not identify or approve specific infrastructure projects, nor does it facilitate development in remote, undeveloped, or high wildfire hazard areas where new

infrastructure could increase the likelihood of wildfire ignition or spread. The identified housing sites are located within the existing urbanized area of Calexico and are generally served by existing roadway networks, utility systems, and municipal services. Any future infrastructure improvements necessary to support development would primarily consist of extensions, upgrades, or connections to existing urban infrastructure systems. Although housing sites 37-41 and 50-52 intersect with the City's mapped WUI area, there is already existing roadway and utility infrastructure at these sites; therefore future development at these sites would not introduce new infrastructure that could exacerbate wildfire risk. Accordingly, the proposed project would not exacerbate fire risk from the installation of electrical lines.

Future infrastructure improvements associated with residential development would also be required to comply with applicable engineering, utility, fire protection, and building code requirements (See Section 4.15.2 Regulatory Framework) intended to minimize fire risks associated with infrastructure installation and operation. The City Fire Chief may also use their authority to require additional building, planning, or landscaping requirements that provide enhanced fire protection. Utility providers and public agencies would remain responsible for the ongoing inspection, operation, and maintenance of infrastructure in accordance with applicable safety regulations and industry standards. Therefore, impacts to fire risks associated with the installation or maintenance of associated infrastructure would be less than significant.

4.15.7.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.15.7.3 Significance After Mitigation

Impacts would remain **less than significant.**

4.15.8 Issue 4: Post-Fire Flooding or Landslides

Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

4.15.8.1 Impact Analysis

The City of Calexico is characterized by relatively flat terrain and highly urbanized land uses. The proposed Housing Element sites are not located in mountainous areas or steep hillside environments susceptible to post-fire slope instability or landslides.

In addition, the project would not introduce development into heavily vegetated WUI areas where wildfire-related erosion or debris flow hazards would be substantial. Although

localized flooding conditions may occur during storm events, compliance with the CBC, grading ordinances, and the National Pollutant Discharge Elimination System (NPDES) requirements would further ensure that development incorporates engineering and design practices that avoid significant increases in erosion or geologic hazards. Implementation of the project would not substantially increase risks associated with post-fire runoff, debris flows, or landslides. Therefore, impacts would be less than significant.

4.15.8.2 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

4.15.8.3 Significance After Mitigation

Impacts would remain **less than significant.**

5 Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

The range of alternatives is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

This EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen significant adverse impacts.

5.1 Development of Alternatives

To develop project alternatives, the City considered the project objectives and the significant impacts of the proposed project. As detailed in Chapter 3, Project Description, the project objectives include the following:

1. Facilitate the City's ability to accommodate the City's RHNA allocation for the 2021–2029 planning period.
2. Support a range of housing types and densities that can accommodate households across all income levels, including very low-, low-, moderate-, and above-moderate-income categories, consistent with State housing law requirements.
3. Ensure internal consistency between the Housing Element, General Plan, and Zoning Code by identifying and evaluating necessary amendments that enable the anticipated housing capacity and development patterns.
4. Promote land use patterns and housing programs that support affirmatively furthering fair housing (AFFH), including increased access to housing opportunities and resources for all segments of the community, including persons with special needs.
5. Facilitate housing opportunities within areas supported by adequate infrastructure, utilities, access, and public services, such that development can occur without causing or exacerbating environmental effects where feasible.

As discussed throughout Chapter 4, Environmental Analysis, of this DEIR, the proposed project would result in significant and unavoidable environmental impacts related to agricultural resources (conversion of farmland), air quality (cumulative criteria pollutants), greenhouse gas emissions (program level GHGs, and conflicts with applicable plans), and transportation (vehicle miles traveled (VMT)). All other impacts were determined to be less than significant or could be mitigated to a less than significant level.

5.2 Alternatives Considered and Rejected

The *CEQA Guidelines* state that an EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (*CEQA Guidelines* Section 15126.2(c)). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts (*CEQA Guidelines* Section 15126.6(c)). Because the Housing Element Update is a programmatic update that applies to the entirety of the City, an alternative location analysis is not feasible and was not analyzed.

The following section describes the potential alternative to the project that was considered by the City but were rejected due to the inability to avoid significant environmental impacts.

5.2.1 Reduced Density Alternative

The City considered several potential alternatives that would involve reduced future development compared to the proposed project, including alternatives that would involve decreased housing density across all identified sites while still meeting the 6th Cycle RHNA. For example, if we reduced the overall proposed densities by 15 percent, the assumed net yield would be approximately 4,926 units, which would still meet and exceed the 6th Cycle RHNA of 4,868. However, a 15 percent reduction in overall density would not avoid the previously stated significant environmental impacts, as the significant impacts are based on the site locations versus the overall quantity of units. Additionally, although the Reduced Density Alternative would result in meeting the 6th Cycle RHNA, the unit yield would not have a buffer to factor in the potential of no net loss when a developer proposes a reduced density project below the density assumption for the underlying zone of the proposed development. Although the Reduced Density Alternative would result in meeting the 6th Cycle RHNA, it would not have a buffer to factor in the potential of no net loss when a developer proposes a reduced density project below the density assumption for the underlying zone of the proposed development.

As discussed below in Sections 5.3, the City considered alternatives that involve a reduced level of future development yet still have sufficient housing sites and density to meet the RHNA.

5.3 Project Alternatives

Consistent with CEQA Guidelines Section 15126(d), the alternatives described below are analyzed to include sufficient information to allow a meaningful analysis and comparison with the project. For purposes of this analysis, those subject areas included in Chapter 4.0 are also included in the analysis of the alternatives. The following sections include a discussion of the impacts of the alternatives compared to the project. The conclusion for each alternative also provides an overview of how the alternative meets, partially meets, or fails to meet the project objectives.

5.3.1 No Project Alternative – Existing General Plan Buildout

The following discussion of the No Project Alternative is based on CEQA Guidelines Section 15126.6(e)(3)(A), which states: "When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, an alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."

Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), the No Project Alternative assumes the continued implementation of the City's existing General Plan, zoning regulations, and Housing Element, without adoption of the proposed Housing Element Update, General Plan amendments, zoning amendments, or the proposed rezone of the Bowker Industrial site (APN 059-180-029) from Residential Condominium (RC) to Industrial (I). Under the No Project Alternative, no changes would occur to the City's existing land use designations or zoning districts for the housing sites identified in the proposed project. Residential densities would remain as currently permitted, and the Land Use Element would not be amended to increase allowable residential densities or modify land use designations. Existing land uses would continue, and future development would occur in accordance with the City's current General Plan, zoning regulations, and development standards.

Since the proposed zoning and General Plan amendments would not be implemented, future residential development capacity would remain limited by the City's existing land use policies, zoning regulations, and allowable densities. As a result, the City would not provide sufficient residential capacity to accommodate its Regional Housing Needs Allocation (RHNA), particularly for low income households, and the No Project Alternative would not achieve one of the primary objectives of the proposed Housing Element Update.

5.3.1.1 Impact Analysis

Agricultural Resources

Future development under the No Project Alternative would be consistent with the City's adopted General Plan. Under the No Project Alternative, the proposed General Plan and zoning amendments would not be adopted and the identified housing sites would retain their existing land use and zoning designations. Accordingly, this alternative would not facilitate the same level or pattern of residential development on lands at the City's urban edge However, development could still occur under existing land use designations and entitlements, including the conversion of agricultural land to residential uses where currently permitted. Therefore, impacts to agricultural resources would remain significant and unavoidable, but would be reduced compared to the proposed project.

Air Quality

Future development under the No Project Alternative would be consistent with the City's adopted General Plan and therefore consistent with the existing growth projections for which ICAPCD regional air quality standards are based. Although development potential would be less compared to the project, construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. While future development under this alternative would be required to implement mitigation measures documented in the City's General Plan, mitigation for air quality impacts would remain significant and unavoidable. Therefore, impacts associated with air quality would remain significant and unavoidable, similar to the proposed project.

Biological Resources

The No Project Alternative would not increase allowable residential development on the housing sites. As a result, it would reduce the potential for disturbance of vacant or undeveloped lands that may support biological resources. Future development under the No Project Alternative would be subject to implementation of mitigation measures documented in the City's General Plan for biological resources, which would reduce impacts related to sensitive species, sensitive habitats, and wetlands to a level less than significant. Existing federal, State, and local regulations would continue to apply to individual development projects, including compliance with applicable resource agency permitting requirements. Impacts associated with biological resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

Cultural and Tribal Cultural Resources

The No Project Alternative would result in less development potential and less ground disturbance than the proposed project. Consequently, the potential to encounter archaeological or historical resources would be reduced. Future development under this alternative would be required to implement mitigation measures documented in the City's General Plan. Tribal consultation would be done in accordance with Assembly Bill (AB) 130 if applicable. Impacts associated with cultural resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

With less development potential and ground disturbance, the No Project Alternative would reduce the potential to affect tribal cultural resources. Future projects under existing land use regulations would remain subject to applicable General Plan policies, Assembly Bill 52 consultation, and mitigation measures as appropriate. Impacts to tribal cultural resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

Geology and Soils

Future development under the No Project Alternative would occur consistently with the City's adopted General Plan land use plan zoning regulations, and would be subject to potential geologic hazards. Adherence to Safety Element policies, the Municipal Code, and the California Building Code would ensure that future development under this alternative would not cause substantial adverse effects associated with fault rupture, ground shaking, liquefaction, landslide, or expansive soils, and impacts would be less than significant. Similarly, adherence to applicable Municipal Code requirements would ensure that future development under this alternative would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. Implementation of mitigation measures documented in the City's General Plan for paleontological resources would reduce impacts related to paleontological resources to a level less than significant. Because this alternative would facilitate fewer housing units and less ground disturbance, exposure to seismic, soil, and paleontological hazards would be lower than under the proposed project. Therefore, impacts associated with geology and soils would remain less than significant with mitigation, but would be reduced compared to the proposed project.

Greenhouse Gas Emissions

The No Project Alternative would not facilitate the additional population, housing, vehicle travel, energy consumption, and water use associated with the proposed Housing Element Update. Future development under the No Project Alternative would be consistent with the City's adopted General Plan and existing land use and zoning designations. Although development under this alternative would result in less residential development potential than the proposed project, future development would still facilitate new development that

generates GHG emissions above existing baseline conditions. Site-specific development characteristics, including construction schedules, building design, energy use, transportation demand, and operational features, are not currently known. Therefore, the level of GHG emissions associated with future development and the extent to which applicable regulations, General Plan policies, and project-level mitigation measures would reduce emissions cannot be determined at this time. Future discretionary development projects would be subject to subsequent environmental review, during which project-specific GHG emissions and consistency with applicable GHG reduction plans, policies, and regulations would be evaluated and addressed; however, future development that is permitted by right may not be subject to discretionary review or project-specific mitigation. In addition, because the No Project Alternative is a program-level land use scenario and does not identify specific future development projects, consistency with all applicable GHG reduction measures and implementation strategies cannot be determined. Accordingly, future development could generate GHG emissions above existing baseline conditions, that exceed applicable project-level thresholds and could conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts to greenhouse gases would remain significant and unavoidable, but would be reduced compared to the proposed project.

Hazards and Hazardous Materials

The No Project Alternative would not increase residential development capacity near existing transportation, commercial, industrial, or potentially contaminated sites. Future development would be required to adhere to multiple regulations related to hazardous materials handling and transport, including applicable state and local regulatory measures, such as the City's Safety Element and Imperial County HMP. Future development under this alternative would be required to implement mitigation measures documented in the City's General Plan for hazardous materials. The No Project Alternative would not include housing sites within Safety Zones established in the Imperial County Land Use Compatibility Plan (ALCUP). Therefore, impacts to hazards and hazardous materials would be reduced compared to the proposed project.

Hydrology and Water Quality

The No Project Alternative would result in less new development and impervious surface area than the proposed project. Accordingly, it would generate less stormwater runoff and would place less demand on drainage facilities. Future development under the No Project Alternative would be required to adhere to all applicable federal, state, and local water quality standards as provided in various water quality regulations and plans including all pertinent requirements of the City's Urban Water Management Plan, Service Area Plan,

National Pollutant Discharge Elimination System (NPDES) General Construction Permit, as well as all regulations related to water quality. Both redevelopment and new development on vacant sites would be required to comply with applicable stormwater management requirements which focuses on retention and infiltration of waters on-site. Future development would also be required to implement applicable stormwater BMPs and erosion control measures to retain flows on-site and minimize the velocity of stormwater runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Therefore, impacts associated with hydrology and water quality would remain less than significant, but would be reduced compared to the proposed project.

Land Use and Planning

Under the No Project Alternative, the existing General Plan, zoning regulations, and Housing Element would remain in effect. This would avoid physical land use changes associated with the proposed amendments, including the rezone to housing sites within the Imperial County ALUCP safety zones. As a result, the No Project Alternative would avoid the potential impact associated with the inconsistency with the 2026 Imperial County Airport Land Use Compatibility Plan. Therefore, impacts to land use and planning would be reduced compared to the proposed project.

However, under the No Project Alternative, the City would not provide adequate sites and capacity to accommodate its 2021–2029 RHNA and would not achieve consistency among the Housing Element, Land Use Element, and Zoning Code contemplated by the proposed project. This failure would substantially limit achievement of the project objectives and could expose the City to consequences under State housing law, but it would not, by itself, constitute a significant physical environmental impact under CEQA.

Noise

The No Project Alternative would result in fewer construction activities and less project-generated traffic than the proposed project. Construction noise, stationary-source noise, groundborne noise and vibration, and traffic noise attributable to the additional housing capacity would therefore be reduced. Future development under the No Project Alternative would be consistent with the City's adopted General Plan land use plan and would be subject to implementation of applicable standards and policies in the City's General Plan for noise to reduce potential impacts to a level less than significant. Impacts associated with noise would remain less than significant, similar to the proposed project.

Population and Housing

The No Project Alternative would not facilitate the housing capacity needed to accommodate the City's RHNA. Population growth associated with the proposed project would be reduced, but the alternative would also constrain the production of housing for very low-, low-, moderate-, and above-moderate-income households. Although this would lessen growth-related physical impacts, it would fail to meet the central purpose of the Housing Element Update and would not satisfy the City's identified regional housing need. Impacts associated with population and housing would remain less than significant, similar to the proposed project.

Public Services and Recreation

Because the No Project Alternative would support less population and housing growth, it would generate less demand for fire protection, police protection, schools, libraries, and other public services than the proposed project. Existing service providers would continue to serve development allowed under current plans. The No Project Alternative would result in less population growth and correspondingly lower demand for parks and recreational facilities, thus would reduce the demand for on public services compared to the proposed project. Construction of any future public service or recreation facilities would require a separate environmental review and approval. Therefore, impacts associated with public services and recreation would remain less than significant, but would be reduced compared to the proposed project.

Transportation

The No Project Alternative would not facilitate the additional residential capacity evaluated in the Transportation Study. Existing roadway deficiencies identified under current and cumulative conditions could still occur as regional growth proceeds, but the incremental VMT associated with the proposed Housing Element would be avoided. Future development would be designed consistent with established roadway design standards, and access to the existing roadway network would be configured consistent with established roadway design standards that would allow for emergency access. Future impacts to roadway design, active transportation infrastructure, and transit would be consistent with the City’s Circulation Element and the Imperial County ATP.

With regard to vehicle miles traveled (VMT), the Transportation Study concluded that the proposed project would establish a more VMT-efficient land use pattern by replacing certain higher trip-generating commercial and other nonresidential uses with lower trip-generating residential development. Although the proposed project would result in a significant and unavoidable VMT impact because several housing sites would continue to exceed the applicable significance threshold after implementation of feasible mitigation, buildout under the No Project Alternative would be more VMT-inducing. The No Project Alternative

would therefore also result in a significant and unavoidable VMT impact, and the severity of that impact would be greater than under the proposed project.

Utilities and Service Systems

The No Project Alternative would develop fewer dwelling units compared to the proposed project, and thereby less demand for utility services. Utility infrastructure improvements and relocations under the No Project Alternative would be evaluated as part of a future review for site-specific projects. Should separate utility extensions be required outside of the footprints of future site-specific projects, they require environmental review and compliance with existing regulations to address potential environmental impacts. The No Project Alternative would likely result in less demand for water supply, wastewater treatment, and solid waste disposal compared to development proposed under the project. Therefore, impacts associated with utilities and service systems would remain less than significant, but would be reduced compared to the proposed project.

Wildfire

Calexico is largely urbanized and is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. The City is relatively flat with mild winds, and both the City and surrounding region are characterized by either urban or irrigated agricultural uses with little wildfire fuel. Under the No Project Alternative, less development would occur at the urban edge and fewer residents would be added to the City's evacuation network. This alternative would be consistent with the City's Safety Element, County HMP, and existing emergency response standards and related actions. Future development would be required to address emergency response and emergency evacuation and comply with the applicable City building and fire codes and California Fire Code. Therefore, impacts associated with wildfire would remain less than significant, similar to the proposed project.

5.3.1.2. Relationship to Project Objectives

The No Project Alternative would fail to achieve the most fundamental project objective: providing adequate sites and zoning capacity to accommodate the City's 2021–2029 RHNA. It would also fail to support the planned range of housing types and affordability levels, complete the necessary General Plan and zoning consistency amendments, or direct the required housing capacity to areas with available infrastructure and services. The alternative would therefore fail to meet most of the project objectives.

5.3.2 Reduced Sites Alternative

This alternative assumes that the Housing Element Update, zoning amendments, and General Plan amendments are adopted and implemented, but that the Housing Element Update would include fewer housing sites than the proposed project. Under this alternative,

housing units would be concentrated in fewer overall housing sites, and housing sites kept in the inventory would be located in more densely-developed areas away from the urbanized edge of development.

The intent of the Reduced Sites Alternative is to facilitate enough housing units to meet the RHNA and HCD requirements while concentrating housing sites in more developed areas of the City, in order to reduce potential impacts to agricultural resources and VMT.

As shown in Table 5-1: Reduced Sites Alternative Potential Buildout Yield, under this alternative, undeveloped housing sites 1, 2, 15, 16, and 17 would be eliminated from the sites inventory under this alternative. However, to still meet the RHNA, nearby housing sites 3 and 18 would still be proposed as part of this alternative to meet the project objective. The sites inventory and potential buildout associated with this alternative are shown below in Table 5-1: Reduced Sites Alternative Potential Buildout Yield.

Table 5-1: Reduced Sites Alternative Potential Buildout Yield

Housing Site	Assumed Unit Yield	Income Type
3	864	Above Moderate
4	201	Above Moderate
5	188	Moderate
6	92	Low/Very Low
7	25	Low/Very Low
8	50	Low/Very Low
9	229	Above Moderate
10	33	Above Moderate
11	79	Above Moderate
12	155	Above Moderate
13	222	Low/Very Low
14	190	Moderate
18	274	Above Moderate
19	125	Low/Very Low
20	45	Low/Very Low
21	65	Low/Very Low
22	60	Low/Very Low
23	95	Low/Very Low
24	349	Moderate
24b	N/A	N/A
25	219	Above Moderate
26	140	Above Moderate
27	46	Low/Very Low
28	168	Low/Very Low
29	34	Above Moderate

Housing Site	Assumed Unit Yield	Income Type
30	46	Above Moderate
31	129	Moderate
32	64	Low/Very Low
33	32	Low/Very Low
34	143	Low/Very Low
35	4	Moderate
36	48	Low/Very Low
37	18	Low/Very Low
38	32	Low/Very Low
39	18	Low/Very Low
40	18	Low/Very Low
41	19	Low/Very Low
42	24	Low/Very Low
43	36	Low/Very Low
44	21	Low/Very Low
45	35	Low/Very Low
46	23	Low/Very Low
47	11	Moderate
48	130	Low/Very Low
49	90	Low/Very Low
50	19	Low/Very Low
51	19	Low/Very Low
52	19	Low/Very Low
53	35	Low/Very Low
Total	4,982	

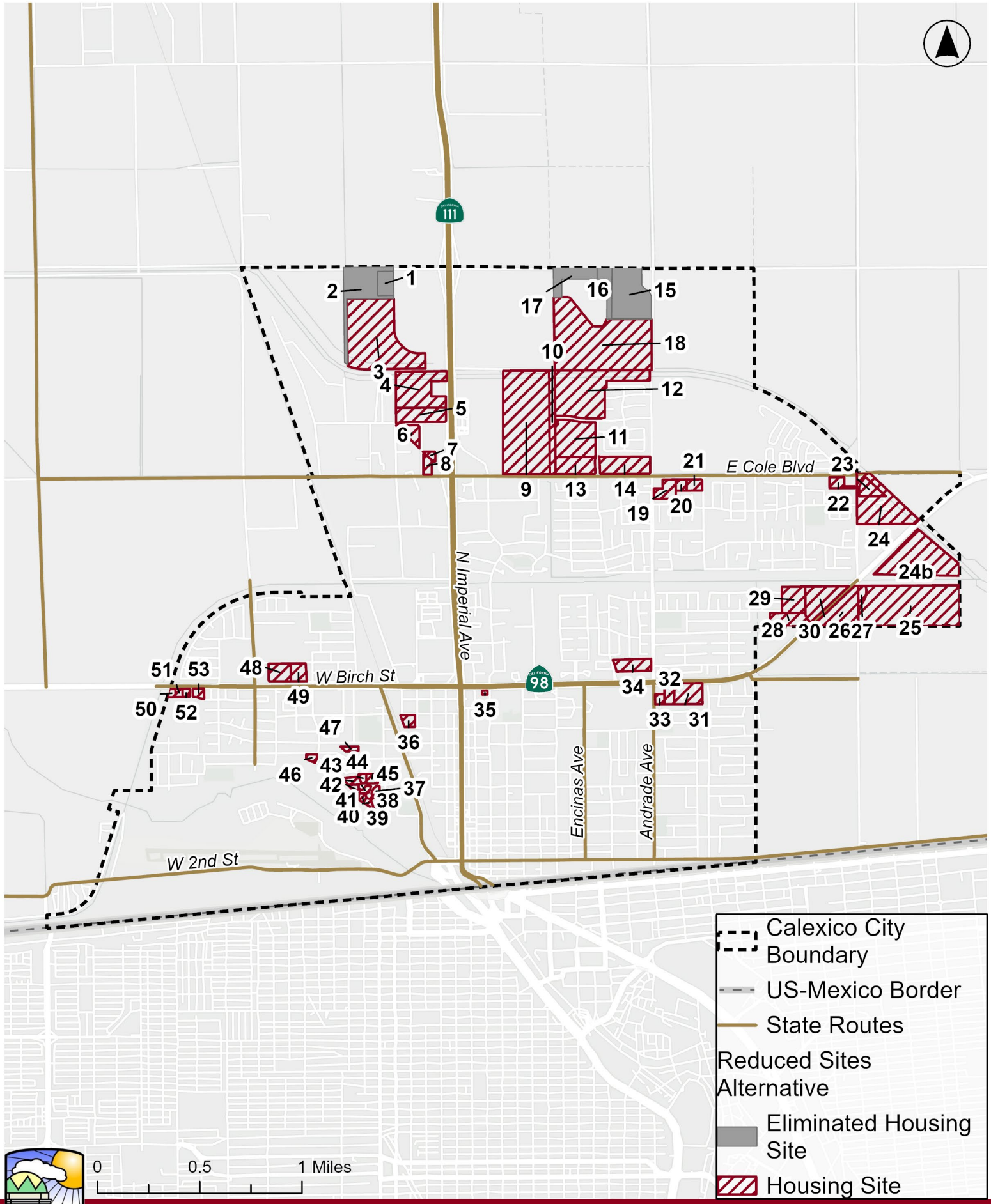


Figure 5-1:
Reduced Sites Alternative

This Reduced Sites Alternative includes the minimum number of sites needed to ensure the development of only the minimum number of housing units required to meet the RHNA and for the Housing Element Update to be approved by HCD. The Reduced Sites Alternative would not include some housing sites that were previously identified in the 4th or 5th Cycle Housing Elements.

While the Reduced Sites Alternative would involve removing several sites from the project housing sites inventory, the remaining sites inventory would still accommodate the low-income RHNA. This alternative would result in a population of approximately 19,031 people (4,982 unit x 3.82 persons per household), which would be a reduction of 3,102 persons from the proposed project projections.

Other than involving fewer housing sites, the Reduced Sites Alternative would involve all other elements of the proposed project, including consistency updates to the City's General Plan Land Use Element, and rezoning the Bowker site from Residential Condominium (RC) to Industrial (I). The Reduced Sites Alternative would accomplish all the project objectives.

5.3.2.1 Impact Analysis

Agricultural Resources

The Reduced Sites Alternative would eliminate Sites 1, 2, 15, 16, and 17, all of which are undeveloped and located near the northern urbanized edge of Calexico. Removing these sites would reduce the acreage of vacant and agricultural land exposed to conversion compared with the proposed project. However, Sites 3 and 18 and other remaining edge sites would continue to accommodate development needed to meet the RHNA, and development of those sites could still convert farmland. Therefore, impacts to agricultural resources would remain significant and unavoidable, but would be reduced compared to the proposed project.

Air Quality

This alternative would accommodate 4,982 units, 813 fewer units than the proposed project, and would result in approximately 3,102 fewer residents. The reduction in construction activity, population, energy use, and vehicle trips would lower criteria pollutant emissions. Nevertheless, substantial residential development would still occur throughout the City, including construction on large sites, and emissions could continue to exceed applicable thresholds. Impacts to air quality would remain significant and unavoidable, but would be reduced compared to the proposed project.

Biological Resources

Eliminating five undeveloped sites would reduce the amount of vacant land subject to disturbance and would lessen the potential to affect sensitive species or habitat. Most remaining sites are within or adjacent to developed portions of Calexico, and future development would remain subject to project-level biological review and applicable mitigation. Impacts to biological resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

Cultural Resources

The Reduced Sites Alternative would involve less total ground disturbance because five undeveloped sites would be removed. This would reduce, but not eliminate, the potential to encounter archaeological or historical resources on the remaining sites. Project-level review and the mitigation measures identified in the EIR would continue to apply. Impacts to cultural resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

The reduction in undeveloped sites and ground disturbance would lessen the potential to affect tribal cultural resources. Development of remaining sites would continue to remain subject to applicable General Plan policies, tribal consultation under AB 130, and implementation of applicable mitigation measures. Impacts to tribal cultural resources would remain less than significant with mitigation, but would be reduced compared to the proposed project.

Geology and Soils

Development under this alternative would be subject to the same seismic, geotechnical, building code, and paleontological requirements as the proposed project. The reduction in sites and units would result in somewhat less grading and soil disturbance, but the types of hazards would be unchanged. Impacts to geology and soils would remain less than significant with mitigation, but would be slightly reduced compared to the proposed project.

Greenhouse Gas Emissions

The Reduced Sites Alternative would reduce development capacity by approximately 813 housing units and 3,102 residents compared to the proposed project, thereby reducing vehicle travel, building energy use, water consumption, solid waste generation, and associated GHG emissions. However, the alternative would still facilitate development of approximately 5,000 housing units and generate associated construction and operational GHG emissions above existing baseline conditions. Although future discretionary development projects would be subject to subsequent environmental review and project-specific GHG impacts would be evaluated and addressed consistent with mitigation, the design and operational characteristics of future development are not currently known, and

the extent to which project-level mitigation would reduce GHG emissions cannot be determined at this time. In addition, future development permitted by right may not be subject to discretionary review or project-specific mitigation. Because the Reduced Sites Alternative is a program-level land use scenario that does not identify specific future development projects, consistency with all applicable GHG reduction measures and implementation strategies cannot be determined, and future individual development could generate GHG emissions that exceed applicable project-level thresholds. Therefore, impacts associated with greenhouse gas emissions would remain significant and unavoidable, but would be reduced compared to the proposed project.

Hazards and Hazardous Materials

The Reduced Sites Alternative would place fewer residents and structures on vacant sites at the City's northern edge nearest to active agricultural operations, modestly reducing potential exposure to hazardous materials transport and other site-specific hazards. The remaining sites would be subject to the same regulatory requirements and project-level investigation described for the proposed project. No remaining housing site is known to be located on an active hazardous materials cleanup case that would preclude residential development. The Reduced Sites Alternative would still include housing sites within Safety Zones established in the Imperial County Land Use Compatibility Plan (ALCUP), subject to MM HAZ-1, which would not mitigated to a level less than significant. Impacts to hazards and hazardous materials would remain significant and unavoidable, similar to the proposed project.

Hydrology and Water Quality

By removing five undeveloped sites, this alternative would reduce grading, impervious surface, and stormwater runoff compared with the proposed project. Development of the remaining sites would still be required to comply with applicable flood control, drainage, stormwater, and water quality requirements. Impacts to hydrology and water quality would remain less than significant, but would be reduced compared to the proposed project.

Land Use and Planning

The Reduced Sites Alternative would retain the Housing Element Update, associated General Plan and zoning amendments, and the Bowker site rezone, while removing five sites from the inventory. The remaining 4,982-unit capacity would continue to exceed the City's RHNA of 4,868 units and would retain sufficient lower-income capacity. The Reduced Sites Alternative would still include housing sites in conflict with the safety zones established in the Imperial County ALUCP, thus would still result in a significant and unavoidable impact related to conflicts with the applicable ALUCP, similar to the proposed project.

Noise

Fewer units and residents would result in less construction activity and lower traffic volumes, reducing temporary construction noise and vibrations and long-term transportation noise. Noise exposure at the remaining sites would be addressed through the same development standards and project-level mitigation as the proposed project. Impacts to noise would remain less than significant, but would be reduced compared to the proposed project.

Population and Housing

The Reduced Sites Alternative would accommodate approximately 4,982 units and 19,031 residents, compared with approximately 5,795 units and 22,133 residents under the proposed project. It would therefore induce less population growth while still exceeding the City's 4,868-unit RHNA and retaining sufficient capacity for lower-income households. The alternative would meet the City's housing obligations without displacing existing housing or people. Impacts to population and housing would remain less than significant, but would be reduced compared to the proposed project.

Public Services and Recreation

The approximately 14 percent reduction in units and population would decrease demand for police, fire protection, schools, libraries, and other public services. Because development would remain concentrated largely within and adjacent to the existing urbanized area, service providers could continue to serve the remaining sites, subject to project-level review and development impact fees. Similarly, this alternative would generate less demand for parks and recreational facilities. Development would remain subject to City parkland impact fees and improvement requirements. Impacts to public services and recreation would remain less than significant, similar to the proposed project.

Transportation

Concentrating development on fewer sites within more developed areas and eliminating five northern edge sites would reduce total trips and VMT relative to the proposed project. The alternative would also reduce demand at study intersections, although the same long-range roadway network and existing deficiencies would remain. However, several retained housing sites would continue to exceed the City's VMT screening threshold and feasible mitigation would not reduce all site-level VMT impacts below the threshold. Therefore, impacts related to transportation would remain significant and unavoidable, but would be reduced compared to the proposed project.

Utilities and Service Systems

The Reduced Sites Alternative would accommodate approximately 3,102 fewer residents and would therefore require less water, wastewater treatment, electricity, natural gas, telecommunications capacity, and solid waste disposal than the proposed project. Using the same planning assumptions applied to the project, water demand and wastewater generation would decrease proportionally, but existing and planned utility systems would still be required to serve the remaining development. Therefore, impacts to utilities and service systems would remain less than significant, but would be reduced compared to the proposed project.

Wildfire

The removal of five sites near the northern edge of the urbanized area would reduce the amount of development at the urban interface and modestly reduce evacuation demand. Calexico would remain outside mapped State Responsibility Areas and Very High Fire Hazard Severity Zones, and the remaining sites would be subject to fire code and emergency access requirements. Impacts to wildfire would remain less than significant, but would be reduced compared to the proposed project.

5.3.2.2. Relationship to Project Objectives

The Reduced Sites Alternative would meet all five project objectives. It would provide capacity for 4,982 units, exceeding the City's RHNA of 4,868 units; retain sufficient sites for all income categories, including the lower-income RHNA; implement the General Plan and zoning amendments needed for internal consistency; preserve the Housing Element's AFFH programs and geographic distribution of housing opportunities; and continue to focus development within areas served by existing or planned infrastructure and public services. Although it would provide a smaller buffer above the RHNA than the proposed project, it would feasibly attain the project's basic objectives while reducing several environmental impacts.

5.4 Comparison of Alternatives

The proposed Project and Alternatives are considered and evaluated within this Draft PEIR. As suggested in State CEQA Guidelines Section 25126.6(d), a matrix summarizing and comparing the impacts of the Alternatives with those of the Project has been included in Table 5-2: Summary of Alternative Impacts Compared to the Proposed Project, below.

Table 5-2: Summary of Alternative Impacts Compared to the Proposed Project

Issue Area	Proposed Project	No Project Alternative	Reduced Sites Alternative
4.1 Agricultural Resources	SU	▼	▼
4.2 Air Quality	SU	=	▼

4.3 Biological Resources	LTSM	▼	▼
4.4 Cultural and Tribal Cultural Resources	LTSM	▼	▼
4.5 Geology and Soils	LTSM	▼	▼
4.6 Greenhouse Gas Emissions	SU	▼	▼
4.7 Hazards and Hazardous Materials	LTS	▼	=
4.8 Hydrology and Water Quality	LTS	▼	▼
4.9 Land Use and Planning	LTS	▼	=
4.10 Noise	LTS	=	▼
4.11 Population and Housing	LTS	=	▼
4.12 Public Services and Recreation	LTS	▼	=
4.13 Transportation/Traffic	SU	▲	▼
4.14 Utilities/Service Systems	LTS	▼	▼
4.15 Wildfire	LTS	=	▼

Notes:
▲ Alternative would result in greater issue area impacts when compared to the Project; however, this different would be negligible and would
not change the significance conclusion.
= Alternative would result in similar issue area impacts when compared to the Project.
▼ Alternative would result in reduced issue area impacts when compared to Project; however, this difference would be negligible and would
not change the significance conclusion.
NI = No Impact.
LTS = Less than Significant Impact; No Mitigation is Required.
LTSM = Less than Significant Impact with Mitigation.
SU = Significant and Unavoidable Impact.

5.5 Environmentally Superior Alternative

Among the project alternatives, the Reduced Sites Alternative is the environmentally superior alternative. It would eliminate five (5) undeveloped sites at the City's northern urban edge, reduce potential buildout by 813 units, and reduce the projected population by approximately 3,102 residents. In comparison to the No Project Alternative, and the proposed project, the Reduced Sites Alternative would reduce environmental effects related to: farmland conversion, construction and operational emissions, sensitive habitat loss, greenhouse gas emissions, VMT, ground disturbance, stormwater runoff, noise, demand for public services and recreation, and demand for water, wastewater, energy, and solid waste services. The alternative would not eliminate all significant impacts: agricultural resources, air quality, greenhouse gas emissions, and transportation impacts would remain significant

and unavoidable because substantial development would still occur on remaining sites, including sites at the urban edge and sites that exceed the City's VMT threshold. Nevertheless, those impacts would be less severe than under the proposed project.

The Reduced Sites Alternative would also feasibly attain all of the basic project objectives. Its estimated capacity of 4,982 units would exceed the City's RHNA of 4,868 units, including the applicable lower-income need, while retaining the Housing Element Update, General Plan and zoning consistency amendments, AFFH framework, and Bowker Industrial site rezone. Accordingly, the Reduced Sites Alternative represents the best balance between reducing the proposed project's environmental impacts and achieving the City's housing and planning objectives.

6 Other CEQA Considerations

This chapter addresses environmental topics required by the California Environmental Quality Act (CEQA) that are not covered within the other chapters of this Draft Program Environmental Impact Report (DEIR), including: significant unavoidable impacts; irreversible environmental changes; growth inducing impacts; potential secondary effects related to project mitigation measures; and environmental effects found not to be significant. In addition, reasons for implementation of the project, notwithstanding potentially significant unavoidable impacts identified, are addressed in this chapter.

6.1 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. The environmental effects of the proposed project, along with recommended mitigation measures, are discussed in detail in Chapter 4, Environmental Impact Analysis, of this DEIR and summarized in the Executive Summary. The proposed project would result in the following significant unavoidable impacts:

6.1.1 Agricultural Resources

The proposed project would result in a potentially significant impact related to converting 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. While implementation of mitigation would serve to reduce the severity of the effects, impacts on agricultural resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the type of Farmland and the characteristics of the proposed activity. The precise extent and nature of impacts that could result from the implementation of the proposed project would be determined when specific project details are developed. Therefore, impacts would remain significant and unavoidable.

The proposed project would result in a potentially significant impact related to involving 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. While implementation of mitigation measures would reduce impacts involving other changes in the existing environment that could result in conversion of Farmland to non-agricultural uses, impacts on agricultural resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the type of Farmland and the characteristics of the proposed activity. The precise extent and nature of

impacts that could result from the implementation of the project would be determined when specific project details are developed. Therefore, impacts would remain significant and unavoidable.

6.1.2 Air Quality

The proposed project would result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. While implementation of mitigation would serve to reduce the severity of the effects, because the level of fugitive PM10 reduction cannot be known at this time, construction-related impacts at Discretionary Development Sites would remain significant and unavoidable.

6.1.3 Greenhouse Gas Emissions

The proposed project would result in a potentially significant impact related to GHG emissions that may have a significant impact on the environment. Although buildout of the proposed project would result in a decrease in GHG emissions when compared to buildout of the adopted land use and zoning designations, implementation of the proposed project would still facilitate new development that would generate GHG emissions above existing baseline conditions. Because the design and operational characteristics of future discretionary projects are not currently known, the level to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, despite the overall reduction in emissions compared to the adopted land use plan, program-level GHG impacts associated with emission levels would remain significant and unavoidable.

The proposed project would result in a potentially significant impact related to conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Although discretionary future development would be required to evaluate and reduce project-specific GHG emissions consistent with mitigation measures, there is currently no mechanism to implement this mitigation for By-Right Development Sites. In addition, because the design and operational characteristics of future discretionary projects are unknown, the extent to which project-level mitigation would reduce GHG emissions cannot be determined at this time. Therefore, after mitigation, program-level GHG impacts would remain significant and unavoidable.

6.1.4 Transportation

The proposed project would result in a potentially significant impact related to conflicting with or being inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which establishes vehicle miles traveled (VMT) as the primary metric for evaluating transportation impacts under CEQA. The Transportation Study determined that future residential

development facilitated by the proposed project at certain housing sites could generate VMT exceeding the applicable significance thresholds. Implementation of the identified mitigation measures would reduce VMT impacts associated with development at housing sites 5, 6, 7, 8, 13, 14, 26, 27, 28, 50, 51, 52, and 53 to below the applicable significance thresholds. However, the Transportation Study determined that development at 16 additional housing sites would continue to exceed the applicable VMT thresholds even after implementation of the maximum feasible VMT reductions evaluated in the study.

Since the proposed project is a policy-level planning document, the specific development characteristics and the availability, effectiveness, and feasibility of individual VMT-reduction measures cannot be fully determined until site-specific development applications are submitted. Therefore, impacts related to VMT would remain significant and unavoidable.

6.2 Significant Unavoidable Environmental Effects/Significant Irreversible Environmental Changes

The California Environmental Quality Act (CEQA) Guidelines Section 15126.2 (c) and (d) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in an Environmental Impact Report (EIR).

6.2.1 Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented

In accordance with CEQA Guidelines Section 15126.2 (c), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR. Implementation of the City of Calexico (City) 6th Cycle Housing Element Update (Housing Element) and associated actions as described in Chapter 3, Project Description, would result in significant, unavoidable impacts associated with the following issues: agriculture (conversion of farmland), air quality, greenhouse gas emissions, and transportation (VMT impacts). Chapter 4, Environmental Analysis, of this Draft Environmental Impact Report (DEIR) provides more detail about the nature and extent of these impacts related to the proposed project.

These impacts would remain significant and unavoidable as a result of the proposed project. All other significant impacts identified in Chapter 4, Environmental Analysis, of this DEIR can be reduced to below a level of significance with implementation of the mitigation framework provided in Chapter 4 of this DEIR.

6.2.2 Significant Irreversible Environmental Changes Which Would Result if the Project is Implemented

CEQA Guidelines Section 15126.2 (d) requires an EIR to evaluate significant irreversible environmental changes that would be caused by the project should it be implemented. Specifically, the CEQA Guidelines cite three types of significant irreversible environmental impacts including:

- Primary impacts such as the use of nonrenewable resources (e.g. oil, natural gas, water, lumber, steel);
- Secondary impacts, which would generally commit future generations to similar uses (such as highway improvements that provide access to previously inaccessible areas); and
- Environmental accidents potentially associated with buildout of the housing sites.

6.2.3 Non-renewable Resources

Potential physical effects of Housing Element Update implementation on a programmatic level are addressed in Sections 4.1 through 4.15 of this DEIR. Future development as a result of the proposed project is a long-term, irreversible commitment of vacant parcels of land or redevelopment of existing developed land in the City. In general, conversion of housing sites from undeveloped land to urbanized uses (paved roadways and graded lots with structures and landscaping) would represent a permanent, irreversible change to the planning area.

Project construction and maintenance of future buildings and infrastructure through implementation of the proposed project would generally require the commitment of energy, natural resources, and building materials. Nonrenewable and limited resources that would be consumed with building construction under the Housing Element may include but are not limited to: oil, natural gas, gasoline, lumber, sand and gravel, asphalt, aggregate, water, steel, copper, plastics, and similar materials. Nonrenewable fuels would be used by future construction equipment, haul trucks, and worker vehicles. As discussed in Section 6.5.2, Energy, construction activities would require the use of energy resources such as electricity and petroleum-based fuels. Construction of individual projects would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered nonrenewable and irreversible.

Operational consumption of nonrenewable resources would include the use of electricity, natural gas, gasoline, and water by future residents, employees, and visitors. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project. Given the low likelihood that the land would revert to lower

intensity uses or to its current form, the proposed project would generally commit future generations to these environmental changes.

In summary, implementation of the project would result in the irretrievable commitment of limited renewable and nonrenewable resources, including energy supplies, water resources, construction materials, and land resources. These commitments are inherent to future urban development and would reduce the availability of these resources for future generations or alternative uses. However, the level of resource consumption associated with implementation of the project would not result in significant irreversible environmental changes because future development would occur, consistent with established regional and local regulations, State housing requirements, and applicable environmental regulations. Therefore, although irreversible environmental changes would occur, such changes would not be considered significant.

6.2.4 Secondary Impacts

The housing sites are accessible via major roadways (e.g., Interstate 8 (I-8), State Route 111 (SR 111/Imperial Avenue), State Route 98 (SR 98/Birch Street), and major arterials such as Cesar Chavez Boulevard, Cole Road, Jasper Road, Dogwood Road, and Second Street/Anza Road, as well as numerous local streets) and are served by existing utilities, and other existing public services. As a result, secondary impacts are not anticipated from environmental changes resulting from the construction of new infrastructure, as discussed in Sections 4.12, Public Services and Recreation, and 4.14, Utilities and Service Systems.

Additionally, the mitigation measures proposed to address significant project impacts were evaluated to determine if significant secondary impacts associated with their implementation would occur. The mitigation measures proposed in the DEIR are designed to reduce or avoid impacts, and ensure compliance with existing regulations, and would therefore not result in significant secondary impacts on the environment.

6.2.5 Environmental Accidents

The CEQA Guidelines require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed project. As described in Section 4.7, Hazards and Hazardous Materials, during construction, future development would likely involve the temporary use of hazardous materials such as fuels, lubricants, solvents, paints, adhesives, and other architectural coating materials associated with construction activities and equipment maintenance. During operation, residential uses would generally involve common household products such as cleaners and solvents, while commercial, industrial, or manufacturing uses at the Bowker site may involve additional hazardous materials associated with facility operations, cleaning and maintenance

activities, or manufacturing processes. However, these materials would not be used or stored in quantities that would create a substantial hazard, and construction contractors would be required to comply with applicable federal, State, and local regulations governing hazardous materials management, worker safety, spill prevention, and emergency response. Federal, State, and local regulations would regulate the handling, storage, and disposal of hazardous materials.

Future development could also increase the potential for conflicts between urban development and adjacent agricultural operations, including exposure to agricultural pesticides. However, pesticide use is regulated by State and local agencies, and General Plan policies require buffers between residential and agricultural uses to minimize potential exposure. In addition, future development would be required to address any contaminated sites encountered during construction in accordance with applicable regulatory requirements. Because all future development would be subject to comprehensive hazardous materials regulations, environmental review, and City policies, implementation of the proposed project would not result in significant irreversible environmental damage associated with environmental accidents.

6.3 Growth Inducing Impacts

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) evaluate the "growth-inducing" effects of a proposed project. Specifically, CEQA Guidelines Section 15126.2(e) requires an EIR to evaluate the ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Additionally, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment either individually or cumulatively. Growth does not inherently result in significant environmental impacts. However, depending on its nature, scale, and location, growth may contribute to physical changes in the environment that could be significant. Under CEQA, growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Rather, growth-inducing effects are considered significant only where the resulting growth would cause or contribute to significant environmental impacts.

Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, the stimulation of economic activity in the region, or the establishment of policies or other precedents that directly or indirectly encourage additional growth. For example, new housing directly supports population growth, while substantial new permanent employment may indirectly create demand for additional housing and services. A project may also indirectly induce growth by removing infrastructure or regulatory constraints on public

services, such as roads or water service. The following section evaluates potential impacts associated with growth-inducing conditions resulting from the proposed project.

6.3.1 Population and Housing Growth

As discussed in Section 4.11, Population and Housing, of this DEIR, implementation of the proposed project would include adoption of the rezoning actions necessary to support the 2021–2029 Housing Element, as identified in Table 3-2, Sites Inventory. The Sites Inventory identifies housing sites throughout the City with the potential to accommodate up to 5,794 residential units, exceeding the City's Regional Housing Needs Assessment (RHNA) allocation of 4,828 units. The additional capacity provides a planning buffer to account for market conditions, site constraints, housing product variations, and uncertainty regarding future development. While full buildout of the identified housing sites could accommodate additional residents, this represents a maximum planning capacity rather than a forecast of future population growth.

With approximately 5,794 residential units, the proposed project could facilitate up to approximately 22,132 residents, using a 3.82 persons per household metric (US Census 2025 estimate). However, the proposed project's unit and population estimates are conservative for multiple reasons: 1) SCAG's 2024 Connect SoCal forecast assumes a household size of 2.63 persons per household by 2050; 2) some of the future units may also serve existing residents; and 3) the estimates offer a higher growth rate in Calexico for the housing cycle years (2021-2029) than historical growth rates. Table 2-30 of the Housing Element shows that between 2010 and 2019 there were an additional 1,218 units provided, which is an overall 11.9 percent increase, or about 1.3 percent per year. The proposed addition of 5,795 units between 2021 and 2029 would be an approximate 51 percent increase, or approximately 6 percent per year. That is why this DEIR assumes a longer buildout of 2050, which would equate to an annual growth rate of approximately 1.7 percent which is more realistic.

At the time the Housing Element was prepared, SCAG's RTP/SCS growth projections projected a population in Calexico of 62,200, which is a 25.2 percent increase from 2020 to 2040. As shown in Table 2-1, Population Growth, 2010-2040, of the Housing Element, the 2010 actual population was 38,572, which is not far from the U.S. Census 2025 population estimate of 38,623. The addition of 22,132 potential residents would therefore be within SCAG's growth projections.

Although the rezones may reduce certain development constraints and support future housing production, the proposed project would not expand the City's boundaries, establish new growth areas, or include infrastructure improvements that would enable unplanned population growth. Instead, development allowed under the project would occur within the

existing urbanized area of the City, in areas already planned for urban development and already served by infrastructure and public services.

Therefore, while the project would result in growth, it would be growth that has been anticipated under the regional population growth forecasts for the City.

6.3.2 Removal of an Impediment to Growth

The proposed project encourages the reuse and intensification of previously developed areas of the City rather than the extension of urban development into undeveloped areas of the City. The project would not directly construct or expand housing, public services, utilities, transportation facilities, or other infrastructure. Instead, it would adopt rezones intended to facilitate future residential and industrial development consistent with SCAG regional population forecasts and the City's 6th Cycle Housing Element. Most of the future residential units and mixed-use development allowed by the project would occur as infill development or development within existing urbanized areas of the City. These areas are already served by essential roadways, utilities, and public services, and the project would not extend infrastructure into undeveloped or remote areas where such improvements could create new development pressure. Because the project would not expand infrastructure capacity, open new areas for development, or otherwise remove a physical or regulatory barrier to unplanned growth, it would not directly remove an impediment to growth.

6.3.3 Foster Economic or Employment Growth

Implementation of the proposed project could generate short-term construction employment associated with future development. However, these temporary jobs would not be considered growth inducing because future construction would likely be supported by the existing Southern California labor force. With exception of the Bowker site, the proposed project would result in an increase in housing rather than non-residential uses within the City so therefore would not directly result in employment opportunities. The project is intended to increase housing capacity within the City to meet Calexico's RHNA and would not directly or indirectly create substantial new employment opportunities or broader economic growth.

The Bowker site would allow for industrial development which would foster economic growth within the City; however, this growth is consistent with the City's existing industrial growth projections, and new jobs are anticipated to be filled by the existing regional labor force. Therefore, impacts related to employment growth are not considered growth inducing.

6.3.4 Conclusion

Overall, the proposed project would facilitate housing growth by adopting rezones that provide additional capacity to help the City meet its RHNA allocation and implement the 6th

Cycle Housing Element. Although the project would support future residential development, that growth has been anticipated as part of the City's planning process and is intended to accommodate projected population and housing needs rather than stimulate unplanned growth. The project would not construct or extend new infrastructure, open isolated or undeveloped areas to development, or otherwise remove a physical or regulatory barrier that could substantially accelerate growth beyond what has already been planned. In addition, the project would not foster substantial economic or employment expansion. Therefore, the project would accommodate planned growth, support the City's obligation to provide adequate housing capacity, and contribute to a more resilient local housing base without resulting in a significant growth-inducing impact.

6.4 Cumulative Impact Analysis

Section 15130(a) of the State CEQA Guidelines states that an EIR shall "discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable." The CEQA Guidelines define cumulative impacts as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 of the CEQA Guidelines further states that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects.

Section 15130 of the State CEQA Guidelines allows for the use of two different methods to determine the scope of projects for the cumulative impact analysis:

- List Method – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- Projections Method – A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis provided in this Draft DEIR is based on the Projections Method, meaning the analysis considers future development anticipated under the Housing Element, General Plan, and SCAG regional growth projections rather than relying on a list of past, present, and probable future projects. Consistent with Section 15130(b)(1)(B) of the State CEQA Guidelines, this Draft DEIR analyzes the environmental impacts of Housing Element sites. As a result, this Draft DEIR addresses the cumulative impacts taking into account growth from the Housing Element in combination with impacts from projected growth throughout the whole of Imperial County and the surrounding region, as forecasted in the adopted SCAG regional projections.

The SCAG growth projections use a 0.43 percent growth rate, however as shown in Table 6-1: Local Population Growth, the City of Calexico has seen a growth rate of approximately 0.08 percent over recent years (U.S. Census Bureau 2025). As such, the SCAG regional growth model conservatively assumes additional growth that would reasonably encompass the 926 additional units beyond the City's RHNA.

Table 6-1: Local Population Growth

Jurisdiction	2035	2050
County of Imperial	39,700	40,700
Calexico	44,400	47,400

6.4.1 Cumulative Analysis Setting and Methodology

Cumulative impacts refer to two or more individual impacts that, when considered together, become considerable, compound, or substantially increase other environmental impacts. Cumulative impacts for a project are considered significant if the incremental effects of the individual projects are considerable when viewed in connection with the effects of past projects, and the effects of other projects located in the vicinity of the project. The cumulative geographic context includes the City of Calexico, Imperial County, and the broader Southern California Association of Governments (SCAG) region addressed in the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

6.4.2 Cumulative Analysis Setting and Methodology

Cumulative impacts refer to two or more individual impacts that, when considered together, become considerable, compound, or substantially increase other environmental impacts. Cumulative impacts for a project are considered significant if the incremental effects of the individual projects are considerable when viewed in connection with the effects of past projects, and the effects of other projects located in the vicinity of the project. In the case of the proposed project, which includes a number of rezones within various sites throughout the City that would ultimately be built out over a 20+ year buildout horizon, cumulative effects would occur from development associated with buildout of the Housing Element Sites combined with effects of development on land within and around the City and the region in the horizon year (2050).

The cumulative geographic context includes the City of Calexico, Imperial County, and the broader Southern California Association of Governments (SCAG) region addressed in the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A significant impact would occur if the proposed project's contribution to the cumulative effect is determined to be substantial. Each subsection below provides an overview of the

potential cumulative impacts that could occur followed by a summary of the project's contribution to that cumulative effect. The subsection concludes with a determination of the significance of the project.

6.4.3 Plans and Programs Evaluated for Determination of Cumulative Impacts

Multiple federal, state, and local planning documents and programs were used to evaluate the proposed project's contribution to cumulative impacts. These plans and programs are discussed under the Regulatory Framework subsections throughout Chapter 4.0. Highlighted below are a number of regional and City plans and programs relied upon throughout the cumulative evaluation.

SCAG 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments' 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), provides the long-range regional framework for accommodating anticipated population, housing, and employment growth while coordinating transportation investment, land use planning, and greenhouse gas reduction strategies. The plan covers the six-county SCAG region, including Imperial County and the City of Calexico.

The RTP/SC encourages compact development, infill housing, increased development intensity within existing urbanized areas, improved access to transit, and expansion of pedestrian and bicycle facilities. The plan also identifies regional transportation investments intended to improve mobility, goods movement, roadway safety, public transit, and active transportation through 2050. Its growth forecasts and development assumptions provide an important basis for evaluating cumulative effects associated with regional population growth, transportation demand, vehicle miles traveled, air pollutant emissions, greenhouse gas emissions, and increased demand for public services and infrastructure.

The Housing Element would support the regional development pattern envisioned by the RTP/SCS by directing future residential growth primarily to sites within Calexico's existing urbanized area and near existing roadways, transit routes, public services, and utility infrastructure. Although development facilitated by the proposed project would contribute to cumulative population growth and transportation demand, concentrating housing within the existing urban area would reduce the need for outward expansion and major infrastructure extensions compared to a more dispersed growth pattern.

City of Calexico General Plan

The City of Calexico General Plan establishes the City's long-term framework for land use, circulation, public services, conservation, safety, economic development, noise, and other

community planning considerations. The General Plan identifies the location and intensity of planned land uses, establishes the roadway classification system, and includes goals and policies intended to guide orderly development while protecting environmental resources and public health and safety. The cumulative analysis considers the combined effects of the proposed Housing Element, development anticipated under the existing General Plan, and other reasonably foreseeable development within the City and surrounding areas. Future projects facilitated by the Housing Element would be required to demonstrate consistency with applicable General Plan goals and policies during project-level review. Where the Housing Element proposes changes to existing land use designations, the analysis evaluates the incremental effects of those changes relative to the development already anticipated under the General Plan.

City of Calexico Municipal Code

The City of Calexico Municipal Code implements the General Plan by establishing zoning regulations, development standards, subdivision requirements, building and fire safety standards, stormwater controls, floodplain regulations, infrastructure requirements, and procedures for reviewing future development projects. Compliance with the Municipal Code would be required for discretionary and by-right projects facilitated by the Housing Element. The Municipal Code also provides mechanisms for requiring project-specific infrastructure improvements and ensuring that new development contributes its proportionate share toward public facilities and services. These requirements would reduce the proposed project's contribution to cumulative impacts by ensuring that future development incorporates appropriate site design, construction controls, public safety measures, and infrastructure improvements. The cumulative analysis therefore assumes continued implementation and enforcement of applicable Municipal Code provisions as development occurs.

Imperial County Transportation Commission Regional Active Transportation Plan

The Imperial County Transportation Commission is responsible for coordinating regional transportation planning and programming throughout Imperial County. ICTC Regional Active Transportation Plan. The Regional Active Transportation Plan identifies existing deficiencies and recommended improvements for pedestrian and bicycle travel, including new bicycle facilities, sidewalks, crosswalks, accessibility improvements, and connections to schools, transit stops, employment areas, and border facilities within Calexico. These plans informed the analysis of cumulative transportation demand, multimodal connectivity, roadway improvements, and consistency with regional transportation objectives.

Imperial County Multi-Jurisdictional Hazard Mitigation Plan

The Imperial County Multi-Jurisdictional Hazard Mitigation Plan identifies regional vulnerabilities to earthquakes, flooding, extreme heat, hazardous materials incidents, wildfire, severe weather, and other natural and human-caused hazards. The plan includes mitigation strategies intended to reduce risks to people, property, infrastructure, and public services throughout Imperial County, including Calexico. The plan was considered in evaluating cumulative exposure to seismic hazards, flooding, emergency response demands, utility disruptions, hazardous materials incidents, and other public safety concerns. Future development facilitated by the Housing Element would be required to comply with applicable building, fire, emergency access, and infrastructure standards that support the regional hazard mitigation objectives identified in the plan.

Imperial County Air Pollution Control District Plans and Regulations

The Imperial County Air Pollution Control District is responsible for regulating stationary and area-source air pollutant emissions and implementing regional air quality planning programs within the Salton Sea Air Basin. Applicable ICAPCD rules address fugitive dust, construction emissions, stationary sources, architectural coatings, and other activities that may contribute to emissions of particulate matter and ozone precursors. Regional air quality plans and ICAPCD regulations were considered in evaluating the cumulative effect of the proposed project together with existing and future development, agricultural activities, transportation sources, and cross-border emissions. Because the Salton Sea Air Basin is designated nonattainment for certain pollutants, cumulative air quality impacts were evaluated based on whether development facilitated by the Housing Element could make a cumulatively considerable contribution to existing regional air quality conditions.

Colorado River Basin Water Quality Control Plan and Regional Water Quality Programs

The Colorado River Basin Regional Water Quality Control Board administers the Water Quality Control Plan for the Colorado River Basin and implements federal and State water quality requirements within the Calexico area. The Basin Plan identifies beneficial uses, establishes water quality objectives, and regulates discharges that could affect surface water and groundwater, including the New River and Salton Sea. Applicable programs include the National Pollutant Discharge Elimination System Construction General Permit, Phase II Small Municipal Separate Storm Sewer System Permit, waste discharge requirements, and Clean Water Act Sections 401 and 404 permitting requirements. These plans and programs were considered in evaluating cumulative water quality degradation, stormwater runoff, erosion, drainage capacity, and effects on regional receiving waters.

City of Calexico Urban Water Management Plan

The City of Calexico Urban Water Management Plan provides the City's long-range framework for evaluating water demand, supply availability, conservation, and reliability under normal, single-dry-year, and multiple-dry-year conditions. The plan incorporates population and development forecasts and evaluates the availability of Colorado River water delivered through the Imperial Irrigation District and treated through the City's municipal water system. The UWMP was used to evaluate the proposed project's contribution to cumulative water demand and the ability of the City's existing and planned water facilities to accommodate future development. The cumulative analysis also considers the City's treatment capacity, historical water use, conservation requirements, and regional constraints affecting Colorado River supplies.

6.4.4 Agricultural Resources

The geographic context for cumulative agricultural resources impacts includes the City of Calexico, Imperial County, and surrounding agricultural areas where continued urban growth, redevelopment, and infrastructure improvements may contribute to the incremental conversion of agricultural lands and increased land use compatibility conflicts along the urban-agricultural interface. Cumulative impacts to agricultural resources could occur through the permanent conversion of Prime Farmland or Farmland of Statewide Importance to urban uses, the fragmentation of agricultural operations, or the introduction of sensitive receptors adjacent to active farming activities, resulting in increased conflicts related to noise, dust, odors, pesticide application, lighting, and agricultural truck traffic.

Implementation of the Housing Element would facilitate future residential development on identified opportunity sites, including approximately 166 acres of FMMP-designated Prime Farmland and Farmland of Statewide Importance where General Plan land use changes are proposed. Although future development would be subject to applicable federal, State, regional, and local regulations, including the Farmland Protection Policy Act, Farmland Mapping and Monitoring Program, California Land Evaluation and Site Assessment (LESA) Model, the Imperial County General Plan Agricultural Element, and the City of Calexico General Plan policies (Policies 6 and 7 in the Conservation/Open Space Element) preventing "leapfrogging", and agricultural buffering, these regulatory requirements would not fully avoid the permanent loss of Important Farmland or eliminate compatibility conflicts at the urban-agricultural interface.

Implementation of Mitigation Measures MM AG-1 and MM AG-2 would reduce project-specific impacts, however, the effectiveness of project-specific mitigation cannot be fully determined until future development proposals are submitted, impacts associated with farmland conversion and agricultural compatibility would remain significant and unavoidable. Accordingly, implementation of the Housing Element would make a

cumulatively considerable contribution to significant cumulative impacts related to agricultural resources. Therefore, **cumulative impacts related to agricultural resources would be significant and unavoidable**.

6.4.5 Air Quality

The analysis provided in Section 4.2, Air Quality, is cumulative in nature as it considers buildout of land uses to the year 2050. The geographic context for cumulative air quality impacts includes the Salton Sea Air Basin, including the City of Calexico, Imperial County, and surrounding areas where urban development, agricultural operations, cross-border activity, freight movement, and transportation sources contribute to regional pollutant emissions. The Salton Sea Air Basin is designated non-attainment for ozone and particulate matter standards; therefore, continued growth could cumulatively contribute to emissions of ozone precursors, PM10, PM2.5, and other criteria pollutants. Cumulative impacts may result from construction-related fugitive dust and equipment exhaust, operational vehicle trips, stationary sources, and the exposure of sensitive receptors to existing or future pollutant sources.

Implementation of the Housing Element would facilitate future residential and industrial development that would generate temporary construction emissions and long-term operational emissions. Operational emissions associated with representative development sites would remain below applicable Imperial County Air Pollution Control District thresholds, and buildout under the proposed land use and zoning designations would result in an overall decrease in emissions compared to buildout under existing designations. The project would also be consistent with applicable air quality plans and would not expose sensitive receptors to substantial concentrations of toxic air contaminants or generate objectionable odors affecting a substantial number of people.

Future development would be required to comply with ICAPCD regulations and implement Mitigation Measures MM AQ-1 through MM AQ-3, including fugitive-dust controls, construction equipment measures, and low- or no-VOC architectural coatings. These requirements would reduce construction emissions; however, because the extent of fugitive PM10 emissions and the effectiveness of reductions cannot be determined for all future discretionary development at the program level, construction-related PM10 impacts would remain significant and unavoidable. Because the region is already in nonattainment for particulate matter and future construction could make a cumulatively considerable contribution to regional PM10 emissions, **cumulative air quality impacts would be significant and unavoidable.**

6.4.6 Biological Resources

Cumulative impacts could occur through the removal or fragmentation of sensitive habitats, impacts to special-status species and nesting birds, loss or modification of jurisdictional wetlands and other aquatic resources, degradation of wildlife movement opportunities, and increased disturbance associated with expanding urban development.

Implementation of the Housing Element would facilitate future residential development on identified opportunity sites, some of which contain or are adjacent to sensitive vegetation communities, potential jurisdictional aquatic resources, and habitat suitable for special-status wildlife species. Future development would be subject to project-level environmental review, site-specific biological surveys, and compliance with applicable federal, State, regional, and local regulations, including the federal and California Endangered Species Acts, the Migratory Bird Treaty Act, the Clean Water Act, California Fish and Game Code, applicable permitting requirements of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board, as well as applicable City of Calexico General Plan policies protecting biological resources.

In addition, implementation of mitigation measures MM BIO-1 through MM BIO-7 would require site-specific biological surveys, avoidance and minimization of impacts to sensitive species and habitats, pre-construction surveys for nesting birds and special-status wildlife, protection of environmentally sensitive areas, jurisdictional delineations, permitting, biological monitoring, and compensatory mitigation where impacts cannot be avoided. These measures, together with applicable regulatory requirements and future project-level review, would reduce impacts to biological resources to less than significant with mitigation on an individual basis. Because impacts to biological resources would be reduced to less than significant with mitigation, implementation of the Housing Element would not make a cumulatively considerable contribution to a significant cumulative biological resources impact. Therefore, **cumulative impacts related to biological resources would be less than significant with mitigation.**

6.4.7 Cultural Resources and Tribal Cultural Resources

Cumulative impacts could occur through the demolition or alteration of historic buildings and structures, disturbance of previously unidentified archaeological deposits or tribal cultural resources during ground-disturbing activities, or damage to historic landscapes and other culturally significant features.

Future development could result in impacts to known or previously unidentified historical, archaeological, or tribal cultural resources if such resources are present within individual project sites. However, because the Housing Element is a policy-level planning document,

site-specific development proposals have not yet been identified, and all future development would remain subject to project-level environmental review and compliance with applicable federal, State, and local regulations governing cultural and tribal cultural resources, including the National Historic Preservation Act, California Register of Historical Resources, California Public Resources Code Sections 21083.2 and 5097.98, Health and Safety Code Section 7050.5, AB 52 consultation requirements, and applicable City of Calexico General Plan policies.

In addition, implementation of mitigation measures MM CUL-1 and MM CUL-2 would require evaluation of potentially historic buildings, archaeological monitoring where appropriate, significance evaluations for any cultural resources encountered during construction, and avoidance, preservation, or data recovery measures for significant resources. Existing regulatory requirements also establish procedures for the treatment of inadvertent discoveries of archaeological resources, tribal cultural resources, and human remains during ground-disturbing activities. Collectively, these requirements would reduce project-level impacts to historical resources, archaeological resources, tribal cultural resources, and human remains to less than significant. Because impacts associated with cultural resources and tribal cultural resources would be less than significant with mitigation on an individual basis, implementation of the Housing Element would not make a cumulatively considerable contribution to a significant cumulative impact. Therefore, **cumulative impacts related to cultural resources and tribal cultural resources would be less than significant with mitigation.**

6.4.8 Geology and Soils

Cumulative impacts could occur through increased exposure of people and structures to seismic ground shaking, unstable soils, expansive soils, erosion, or other geologic hazards, as well as through the incremental loss of paleontological resources during excavation and grading activities.

Future development in Calexico will increase the number of people exposed to earthquakes and other geologic hazards. Future development will also be constrained by liquefaction and landslides. Erosion rates will be accelerated by earthwork for new construction. Cumulative impacts related to geologic conditions can be mitigated by implementation of federal, State, and local regulations governing seismic safety, grading, erosion control, and building design like the California Building Code, Calexico Municipal Code soil investigation requirements, and applicable policies of the Calexico General Plan and Imperial County Multi-Jurisdictional Hazard Mitigation Plan. Compliance with these requirements would ensure that future development is designed to address site-specific geologic conditions and

minimize risks associated with seismic ground shaking, unstable soils, liquefaction, expansive soils, erosion, and other geologic hazards.

Furthermore, implementation of Mitigation Measure MM GEO-1 would require review of grading activities, paleontological monitoring where appropriate, fossil recovery, and curation of scientifically significant specimens. Because impacts associated with seismic hazards, unstable geology, erosion, expansive soils, septic systems, and paleontological resources would be less than significant on an individual basis or less than significant with mitigation, implementation of the Housing Element would not make a cumulatively considerable contribution to a significant cumulative geology and soils impact. Therefore, **cumulative impacts related to geology and soils would be less than significant with mitigation**.

6.4.9 Greenhouse Gas Emissions

The analysis of greenhouse gas (GHG) emissions is, by its nature, a cumulative issue; thus, the study area is global in nature. The analysis provided in Section 4.6, Greenhouse Gas Emissions, was modeled in year 2050 to align with the Housing Element buildout year. Future development facilitated by the Housing Element would incrementally increase GHG emissions above existing baseline conditions. Although implementation of the Housing Element would result in lower overall GHG emissions compared to buildout under the City's adopted land use and zoning designations, development accommodated by the Housing Element would nevertheless generate GHG emissions that could exceed applicable project-level thresholds.

Because the design, operations, and timing of future discretionary development are not currently known, the effectiveness of project-specific mitigation in reducing GHG emissions cannot be determined at this programmatic stage. Therefore, the Housing Element's cumulative contribution to greenhouse gas emissions would remain **significant and unavoidable after mitigation**.

6.4.10 Hazards and Hazardous Materials

Cumulative hazards impacts could occur related to through increased transportation of hazardous materials on regional roadways and rail corridors, redevelopment of sites with existing contamination; airport hazards; increased exposure of residents to hazardous materials associated with nearby industrial, agricultural, and transportation-related uses; or increased demands on emergency response services. As discussed in section 4.7, Hazards and Hazardous Materials, impacts associated with hazardous materials transportation, accidental releases, hazardous materials sites, emergency response, and wildfire hazards would be less than significant on an individual basis. It should be noted however, that

according to the noise contours obtained from the Imperial County ALUCP show that sites adjacent to the Calexico International Airport would not be exposed to airport noise that exceeds 60 CNEL. However, the Housing Element includes multiple sites that may collectively create a meaningful increase the number of people potentially exposed to a safety hazard risk. As such, **cumulative impacts related to airport hazards resources would be significant and unavoidable**.

6.4.11 Hydrology and Water Quality

The geographic context for cumulative hydrology and water quality impacts includes the City of Calexico, the Imperial Valley portion of the Salton Sea watershed, and downstream receiving waters, including the New River and Salton Sea. Continued urban development, agricultural activity, infrastructure improvements, and cross-border discharges could cumulatively affect surface water quality, stormwater runoff, drainage capacity, groundwater recharge, and flood conditions. Potential cumulative effects could include increased pollutant loads in stormwater runoff, greater volumes and rates of runoff from added impervious surfaces, erosion and sedimentation, reduced infiltration, and increased demands on municipal and regional drainage facilities.

Implementation of the Housing Element would facilitate future residential development on identified opportunity sites within the City's existing urbanized area. Future construction and operation could generate sediment, oils, grease, fertilizers, pesticides, trash, and other pollutants that may enter the City's storm drain system and ultimately discharge to the New River and Salton Sea. Development could also increase impervious surface area and alter localized drainage patterns. Cumulative impacts to water resources can be mitigated to less than significant levels through the implementation and compliance with applicable federal, State, regional, and local requirements, including the Clean Water Act, Porter-Cologne Water Quality Control Act, NPDES Construction General Permit, Phase II Small MS4 General Permit, Colorado River Basin Water Quality Control Plan, Calexico Municipal Code, and the City's Storm Water Program. Therefore, with the implementation of the proposed project, **cumulative impacts related to hydrology and water quality would be less than significant**.

6.4.12 Land Use and Planning

Implementation of the City of Calexico 6th Cycle Housing Element would facilitate residential development capacity necessary to accommodate the City's Regional Housing Needs Allocation (RHNA) for the 2021–2029 planning period through the rezoning of 53 Housing Opportunity Sites and one industrial site on Bowker Road. The proposed project would primarily facilitate infill and redevelopment within the City's existing urbanized area and would not include major infrastructure or physical barriers that would divide established

neighborhoods or communities. In combination with other past, present, and reasonably foreseeable development within the City and Imperial County, the project would support planned regional growth assumptions identified by SCAG and State housing mandates. The Housing Element is intended to implement State Housing Element Law by increasing housing opportunities within areas planned for urban development and served by existing or planned infrastructure.

Future development facilitated by the project would occur within the framework of the City's existing roadway and infrastructure network and would be required to comply with applicable General Plan policies, zoning regulations, objective design standards, and applicable development requirements intended to maintain land use compatibility and community connectivity. However, the proposed project does conflict with the Imperial County Airport Land Use Compatibility Plan (ALCUP) due to multiple housing sites with densities that conflict with the ALUCP regulations. While implementation of MM HAZ-1 would reduce the project's potential exposure to aircraft safety hazards not entirely eliminate the proposed project's potential risks associated with the underlying inconsistency with the ALUCP. It should be noted however, that according to the noise contours obtained from the Imperial County ALUCP show that sites adjacent to the Calexico International Airport would not be exposed to airport noise that exceeds 60 CNEL. However, collectively, the housing sites in conflict with the ALUCP could potentially create a meaningful increase in the number of people potentially exposed to a safety hazard risk, as such, **cumulative impacts related to land use and planning would be significant and unavoidable.**

6.4.1 Noise

Cumulative noise impacts could result from overlapping construction activities, increased roadway traffic, freight rail operations, industrial or mechanical equipment, and the placement of new sensitive land uses near existing transportation and stationary noise sources. Implementation of the Housing Element would facilitate future development throughout the City and could temporarily increase noise from construction equipment, truck trips, grading, and other ground-disturbing activities. Future development would also contribute to traffic noise and could expose new residential uses to existing roadway, railroad, agricultural, commercial, and industrial noise. However, construction noise would be temporary and subject to the City's permitted construction hours and notification requirements. Future residential development in areas with elevated noise exposure would be required to comply with the City's General Plan Noise Element and Municipal Code, including preparation of site-specific noise studies and incorporation of noise-reduction features where necessary. Excessive airport noise impacts would remain below applicable thresholds.

Potential industrial development at the Bowker site could introduce stationary noise sources near sensitive receptors. Implementation of Mitigation Measure MM NOS-1 would require a site-specific noise analysis and incorporation of measures necessary to meet the City's applicable noise limits. With regulatory compliance and implementation of MM NOS-1, project-level noise and vibration impacts would be reduced to less than significant. Ground borne vibration impacts associated with construction activities would potentially significant, however with implementation of MM NOS-2, impacts would be reduced to less than significant.

Because the Housing Element would not make a cumulatively considerable contribution to excessive construction noise, operational noise, ground borne vibration, railroad noise, or airport noise, **cumulative noise impacts would be less than significant with mitigation.**

6.4.2 Population and Housing

Implementation of the project would support the City's ability to meet its RHNA obligations and accommodate anticipated population growth projections through the planning horizon by facilitating additional housing opportunities. Future growth associated with the project and other development within the City would occur in accordance with the General Plan, Housing Element, and Zoning Code, and therefore would represent planned growth rather than substantial unplanned population increases.

In addition, future development facilitated by the project would be required to comply with applicable State regulations regarding relocation assistance and replacement housing, where applicable, thereby reducing the potential for displacement of substantial numbers of residents or housing units. Because development associated with the project would occur within the framework of adopted planning documents and established regulatory requirements, implementation of the project would not result in cumulatively considerable impacts related to population or housing. Accordingly, **cumulative impacts would be less than significant**.

6.4.3 Public Services and Recreation

Cumulative impacts could occur if this increased demand required the construction or expansion of public facilities that could result in adverse physical effects or caused substantial deterioration of existing facilities.

Implementation of the Housing Element would accommodate future residential growth and incrementally increase demand for fire protection, police services, schools, libraries, parks, and recreation. However, future development would occur primarily within the City's existing urbanized area, where public services and facilities are already provided. Individual development projects would be reviewed by applicable City departments and service

providers to ensure compliance with fire protection, emergency access, school, parkland, and public facility requirements. Development impact fees, school impact fees, parkland dedication requirements, and other financing mechanisms would provide funding toward additional staffing, equipment, facility improvements, and service capacity necessitated by future growth.

The Housing Element would not directly authorize construction of new or expanded governmental or recreational facilities. Any future facility expansion determined necessary to serve cumulative growth would be subject to separate project-level environmental review before approval and construction. Compliance with applicable service standards, development review requirements, and impact fee programs would ensure that the project's incremental demands are addressed without causing substantial physical deterioration of existing facilities or requiring facilities with significant unmitigated environmental effects. Therefore, implementation of the Housing Element would not make a cumulatively considerable contribution to a significant cumulative public services or recreation impact, and **cumulative impacts would be less than significant.**

6.4.4 Transportation

Cumulative transportation impacts could occur through increases in vehicle miles traveled (VMT), traffic volumes, transit demand, bicycle and pedestrian activity, and freight movement, as well as increased demands on roadway capacity and multimodal transportation infrastructure.

Implementation of the Housing Element would facilitate future residential development on identified opportunity sites throughout the City, resulting in additional vehicle trips and travel demand. Future development would be required to comply with applicable federal, State, regional, and local transportation plans, policies, and design standards, including Senate Bill 743, the Calexico General Plan Circulation Element, SCAG Connect SoCal, the ICTC Regional Active Transportation Plan, and the City of Calexico Bicycle Master Plan. Future development would also be subject to project-level review to ensure adequate roadway, bicycle, pedestrian, transit, and emergency access improvements, where appropriate. In addition, implementation of the Housing Element would support infill development patterns that encourage the use of existing transportation infrastructure and promote walking, bicycling, and transit consistent with regional transportation planning objectives.

As discussed in Section 4.13, Transportation, the proposed project would not conflict with applicable circulation plans or policies, substantially increase transportation hazards due to roadway geometric design features or incompatible uses, or result in inadequate emergency access. These impacts would be less than significant and would not make a cumulatively considerable contribution to regional transportation impacts. However, the

several housing sites would generate VMT exceeding the applicable CEQA significance threshold. Although implementation of MM-TRA-1 would reduce VMT at many sites, 16 housing sites would continue to exceed the significance threshold because additional feasible reductions are not available. Consequently, project-specific VMT impacts would remain significant and unavoidable.

Because VMT impacts would remain significant and unavoidable after implementation of feasible mitigation measures, the proposed project would make a cumulatively considerable contribution to significant cumulative transportation impacts associated with vehicle miles traveled. Therefore, **cumulative transportation impacts would be significant and unavoidable.**

6.4.1 Utilities and Service Systems

Cumulative impacts to utilities and service systems could occur if demand exceeded available supply or system capacity or required new or expanded facilities with significant environmental effects.

Implementation of the Housing Element would facilitate future residential and industrial development and increase demand for utility services. However, development would generally occur within urbanized areas served or planned to be served by existing utility infrastructure and would be subject to the City's development review, utility connection, engineering, and infrastructure financing requirements. Projected water demand is within the population and demand forecasts evaluated in the City's Urban Water Management Plan, and the City and IID anticipate sufficient supply during normal, single-dry, and multiple-dry-year conditions. Wastewater generated by project buildout would remain within the City's projected treatment capacity, while planned wastewater treatment plant and lift station improvements are intended to serve broader cumulative growth rather than correct a deficiency caused solely by the Housing Element.

Future development would also be required to construct or fund project-specific water, sewer, drainage, electrical, natural gas, and telecommunications improvements where necessary. Stormwater facilities would be addressed through applicable drainage standards and development impact fees. Solid waste would be accommodated by permitted local and regional disposal facilities with remaining capacity, and future projects would comply with applicable recycling, organic waste diversion, and solid waste reduction requirements. Utility providers would continue to implement capital improvement programs and evaluate service capacity as development occurs.

Because adequate utility supplies, treatment capacity, disposal capacity, and infrastructure planning mechanisms are available to serve the project together with reasonably

foreseeable cumulative growth, the proposed project would not make a cumulatively considerable contribution to a significant cumulative utilities and service systems impact. Therefore, **cumulative impacts related to utilities and service systems would be less than significant.**

6.4.1 Wildfire

Cumulative development within the City and region, including implementation of the proposed Housing Element and other anticipated residential, commercial, industrial, and infrastructure projects, could increase demand for fire protection services, emergency medical response, roadway capacity, and emergency response infrastructure.

Implementation of the proposed project would primarily facilitate infill and urban development within areas already served by existing infrastructure, roadway networks, utilities, and emergency response services. The project would not introduce substantial development into wildland areas or areas identified as having significant wildfire hazards. Additionally, future development projects facilitated by the Housing Element would be required to comply with applicable California Fire Code, California Building Code, and City development standards related to emergency access, fire flow, hydrant spacing, roadway design, and emergency response circulation.

Future increases in service demand associated with cumulative growth would be addressed through the City's ongoing capital improvement planning, budgeting, development impact fee programs, staffing adjustments, and infrastructure planning processes. In addition, future development proposals would continue to undergo project-specific review to ensure adequate fire protection infrastructure and emergency access are provided, consistent with applicable regulations and service standards.

Because the project would accommodate planned regional growth within existing urbanized areas and would not substantially exacerbate wildfire hazards or impair emergency response capabilities, the project's contribution to cumulative wildfire and fire protection impacts would not be cumulatively considerable. Therefore, **cumulative impacts would be less than significant.**

6.5 Effects Found Not to be Significant

Pursuant to Section 15128 of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must briefly describe the reasons why certain potential environmental effects were determined not to be significant and, therefore, were not evaluated in detail in the DEIR. Based on the Notice of Preparation (NOP), comments received during the scoping process, and the City's preliminary environmental review, the proposed project was determined not to have the potential to result in significant impacts

related to aesthetics, energy, or mineral resources. Accordingly, these issue areas were not carried forward for detailed analysis in Chapter 4, Environmental Impact Analysis. The basis for these determinations is summarized below.

6.5.1 Aesthetics

Consistent with CEQA Guidelines Appendix G, a significant impact to aesthetics would occur if the project would:

1) Have a substantial adverse effect on a scenic vista?
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
3) Substantially degrade the existing visual character or quality of the site and its surroundings?
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Scenic Vistas, Resources, and Highways

According to the adopted 2005 General Plan, Conservation and Open Space Element, Conservation Resource Assessment Section 5.2.7 Landform Features and Scenic Resources, the City's vast agricultural lands considered aesthetic resources and should be preserved to retain a significant portion of the City's character and sense of place. The General Plan does not however establish any scenic vistas of these resources, nor does the State recognize any scenic highways within the City of Calexico (Caltrans 2018).

Since there are no designated scenic vistas or scenic highways in the City, implementation of proposed project would avoid any local impacts in these areas. While the building heights of the proposed residential development would vary on a project-by-project basis limited by the parameters of the sites, underlying land use and zoning designations, and building heights would be similar to existing development throughout the City and would not cause a substantial obstruction of views of the surrounding agricultural lands. Agricultural views would still be available throughout the City at various locations with the development of the proposed project.

Future development would be required to comply with the City's General Plan, Zoning Ordinance, and applicable development standards governing building height, setbacks, landscaping, signage, and site design. The Calexico Zoning Ordinance establishes the City's development review procedure, which is intended to:

- Encourage the orderly and harmonious appearance of structures and property within the city;

- Assist private and public developments to be more cognizant of public concerns for the aesthetics of development; and
- Reasonably ensure that new developments, including residential, commercial, industrial and public/quasi-public development, do not have an adverse impact on aesthetics, health, adjoining properties, or the city in general (Calexico Code Section 17.01.720).

With compliance with the applicable regulations and the City's development review procedures, the proposed project would not have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including trees, rock outcroppings, or historic buildings within a State scenic highway. Since future development is subject to design review and any required project-specific environmental review to ensure compatibility with surrounding land uses, the proposed project would also not substantially degrade the existing visual character or quality of the project sites and surrounding areas.

Light and Glare

Future residential development associated with the proposed project would be subject to the applicable Calexico Zoning Ordinance Residential Zones general standards included in Section 17.03, including:

- Residential performance standards that state lighting shall not disturb the peace, quiet and comfort of neighboring residents and shall be screened, shielded and/or buffered from surrounding properties and streets (Section 17.03.130(A)(1); and
- Accessory dwelling unit (ADU) architectural requirements that require exterior lighting must be limited to down-lights or as otherwise required by the building or fire code (Section 17.03.200(G)(8)).

Future industrial development associated with the proposed project would be subject to the Calexico Municipal which regulate aesthetic elements like building materials, reflective surfaces, and screening measures, and Section 17.07.131(G) requires lighting to be shielded to confine light spread within the site boundaries.

Although future residential and mixed-use development may introduce additional lighting, such lighting would be subject to the lighting standards established in the Calexico Zoning Ordinance. Compliance with these applicable standards along with compliance with the California Building Code and California Fire Code would minimize off-site lighting and glare. As such, the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

6.5.2 Energy

Consistent with CEQA Guidelines Appendix G, a significant impact to aesthetics would occur if the project would:

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

Energy Consumption

Future development facilitated by the proposed project would consume energy throughout its lifecycle, including fuel used during construction, electricity and natural gas used during operation, and transportation-related fuel consumption by future residents.

Construction

The proposed project would not directly result in construction activities or associated energy consumption. Instead, the proposed project identifies sites that may be developed over the planning horizon through separate future development proposals. Construction of future residential and industrial development would require energy in the form of diesel fuel, gasoline, and electricity to operate heavy equipment, transport construction materials, and support temporary construction activities. At the program-level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. The magnitude of construction-related energy use would depend on the size, type, and timing of individual projects, none of which are approved as part of the proposed project.

Construction of future development projects would be required to comply with applicable building and construction requirements, including the California Air Resources Control Board (CARB) Tier 3 In-Use Off-Road Diesel Engine Standards, in which engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and use more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards require that construction equipment fleets become cleaner and use less energy over time. In addition, construction of future development would be subject to the California Building Standards Code (Title 24), CALGreen, and any applicable City development standards intended to improve construction efficiency and reduce unnecessary energy consumption.

Operations

Following construction, future development facilitated by the proposed project would require ongoing fuel consumption and energy by residential and industrial operations to support transportation, building operations, public services, and utility infrastructure. Operational energy demand would increase incrementally as development occurs over the proposed project planning period and would reflect population growth anticipated by SCAG's 2024 Regional Growth Forecast. Energy demand of future residential development would be in alignment with energy demand for residential and industrial within other cities in Imperial Valley and would not be associated with inefficient or wasteful energy use. Implementation of the project would not result in any unusual characteristics that would result in excessive long-term operational building energy demand. Future operational energy use would be reduced through compliance with evolving State energy efficiency regulations, including Title 24 Building Energy Efficiency Standards, CALGreen requirements, Title 20 Appliance Efficiency Regulations adopted by the California Energy Commission, and utility conservation programs administered by the Imperial Irrigation District (IID) and Southern California Gas Company.

Transportation

Future residents of housing sites would consume transportation energy through daily travel for employment, education, shopping, recreation, and other activities. Vehicle fuel consumption would vary depending on travel behavior, availability of alternative transportation modes, and vehicle technologies. Many housing sites are located within existing urbanized areas where public services, employment opportunities, schools, and commercial uses are already available, reducing the need for longer vehicle trips. Although future development would generate additional vehicle trips, the project proposes multi-family housing near existing retail sites in which non-commute vehicle trips may be reduced. The City shall ensure that future projects are compliant with the Circulation Element's Objectives and Policies 4, 5, 6, and 7 which require or facilitate public transit service, pedestrian facilities, and bicycle facilities, which would reduce the project's vehicle trips. In addition, the proposed project would be subject to MM-TRA-1 which would encourage the use of Transportation Demand Management (TDM) strategies, such as ride sharing programs, flexible work schedule programs, and incentives for employees to use transit.

As such, the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of transportation-related energy, and impacts would be less than significant.

Electricity and Natural Gas

Future residential development accommodated by the proposed project would increase demand for electricity and, where utilized, natural gas service. Electrical service would continue to be provided by the IID, while natural gas service would be provided by Southern California Gas Company where available. New buildings constructed during the proposed project planning period would be required to comply with the current California Building Energy Efficiency Standards contained in Title 24, which require substantially greater energy efficiency than previous building codes through improved building envelopes, lighting systems, heating and cooling equipment, water heating systems, and other design features. In addition, CALGreen requires measures that reduce energy consumption and improve building performance. As California continues to adopt increasingly stringent building energy standards and promote building electrification, future residential development is expected to become progressively more energy efficient, reducing long-term electricity and natural gas consumption on a per-unit basis

Energy Plans

The applicable State plans governing renewable energy and energy efficiency include the California Green Building Standards Code (CALGreen), the California Energy Code (Title 24, Part 6), the California Energy Commission (CEC) Building Energy Efficiency Standards, Senate Bill (Senate Bill) 100 and SB 350 which establish Renewables Portfolio Standard (RPS) and Statewide energy efficiency and renewable energy goals. At the local level, future development facilitated by the proposed project would be required to comply with the City of Calexico General Plan, including the Public Facilities/Services Element, as well as applicable provisions of the Calexico Municipal Code. See Section 4.6, Greenhouse Gas Emissions, for further discussion of applicable climate goals and regulations.

The proposed project is a policy-level planning document that does not directly authorize construction or consume energy. Future development accommodated by the proposed project would not conflict with or obstruct implementation of statewide renewable energy and energy efficiency programs administered by the CEC, the California Public Utilities Commission, or the IID. Furthermore, future development would be consistent with the goals and policies of the City of Calexico General Plan related to coordinated infrastructure planning, efficient public services, and sustainable community development. Therefore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

6.5.3 Mineral Resources

Consistent with CEQA Guidelines Appendix G, a significant impact to mineral resources would occur if the project would:

1) 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.
2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Surface Mining and Reclamation Act (SMARA) of 1975 established policies for the conservation, development, and reclamation of mineral lands. It also contained specific provisions for the California Geological Survey to classify the regional significance of mineral resources through the use of Mineral Resource Zones (MRZs). The following provides a description of the four different MRZs:

- MRZ-1 designates areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2 designates areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present.
- MRZ-3 designates areas that contain known mineral deposits, the significance of which cannot be evaluated from available data.
- MRZ-4 designates areas where available information is inadequate for assignment to an MRZ zone

Imperial County is not located within a designated SMARA MRZ. Additionally, there are no mines within Calexico according to the latest available maps from the California Department of Conservation Division of Mine Reclamation. The City's General Plan Conservation and Open Space Element states that the Department of Conservation mapped seven principal mineral producing localities within Imperial County that included sand, gravel, gypsum, clay, and gold; however, none of these locations were within Calexico City boundaries.

Accordingly, implementation of the proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site, and impacts related to mineral resources would be less than significant.

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