DRAFT
ENVIRONMENTAL IMPACT REPORT
VOLUME 1
GLAMIS SPECIFIC PLAN
SCH NO: 2020100348

Glamis Specific Plan (SP 19-0001)
Zone Change (19-0006)

January 2023

Prepared for:
Imperial County
Planning & Development Services

Prepared by:
McIntyre Environmental

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SCH No. 2020100348

Glamis Specific Plan (SP 19-0001)
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Prepared for
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VOLUME 2: APPENDICES TO THE ENVIRONMENTAL IMPACT REPORT (UNDER SEPARATE COVER)

ACRONYMS AND ABBREVIATIONS

AAQP	Ambient Air Quality Plan
AB	Assembly Bill
ACI	American Concrete Institute
ADT	Average Daily Traffic
AEP	annual exceedance probability
AF	acre feet
AFY	Acre feet per year
APCD	Air Pollution Control District
APE	Area of Potential Effect
APN	Assessor's Parcel Number
APS	alternate planning strategy
AQAP	Air Quality Attainment Plan
AQIA	Air Quality Impact Assessments
BACM	Best Available Control Measure
BACT	best available control technologies
BAU	Business as Usual
BLM	Bureau of Land Management
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEnergy	CalEnergy Operating Corporation
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CESA	Cumulative Effects Study Area
CFR	Code of Federal Regulations
CGC	California Government Code
CGS	California Geological Survey

ACRONYMS AND ABBREVIATIONS

CHP	California Highway Patrol
CH_4	Methane
CMAGR	Chocolate Mountain Aerial Gunnery Range
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon dioxide
CPUC	California Public Utilities Commission
CR	Commercial Recreation
CRHR	California Register of Historical Resources
CSSC	California Species of Special Concern
CTCs	county transportation commissions
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fee
DOT	Department of Transportation
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
EAP	Energy Action Plan
EHS	Environmental Health Services
EIR	Environmental Impact Report
EO	Executive Order
EOP	Emergency Operations Plan
EPAct	Energy Policy Act of 1992
ESA	Endangered Species Act
ESA	Environmentally Sensitive Area
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping & Monitoring Program
FTA	Federal Transit Administration
FTHL	Flat-tailed horned lizard
GHG	Greenhouse gases
GSP	Groundwater sustainability plan

ACRONYMS AND ABBREVIATIONS

GSPA	Glamis Specific Plan Area
GWP	global warming potential
H_2S	Hydrogen Sulfide
HCP	Habitat Conservation Plan
HDM	Highway Design Manual
HMTS	Hazardous Materials Technical Study
HRP	Habitat Restoration Plan
HUD U.S.	U.S. Department of Housing and Urban Development
ICAPCD	Imperial County Air Pollution Control District
ICE	Intersection Control Evaluation
ICFD	Imperial County Fire Department
ICPDSD	Imperial County Planning & Development Services Department
ICTC	Imperial County Transportation Commission
IEPR	Integrated Energy Policy Report
IID	Imperial Irrigation District
IRWMP	Imperial Integrated Regional Water Management Plan
IS	Initial Study
ISDRA	Imperial Sand Dunes Recreation Area
ITP	Incidental Take Permit
IVT	Imperial Valley Transit
JCP	joint contingency plan
KOP	Key Observation Points
LCFS	Low Carbon Fuel Standard
LEA	Local Enforcement Agency
LLG	Linscott Law and Greenspan
LOS	Levels of Service
LSA	Lake and Streambed Alteration
LTF	Local Transportation
MBTA	Migratory Bird Treaty Act
MPO	Metropolitan Planning Organizations
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLD	most likely descendant
MMTs	million metric tons
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration

ACRONYMS AND ABBREVIATIONS

MOU	memorandum of understanding
mph	miles per hour
MPO	Metropolitan Planning Organizations
MT	metric ton
MW	megawatt
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NADW	North Algodones Dunes Wilderness
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NIMS	National Incident Management System
NO_2	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NORM	Naturally Occurring Radioactive Materials
NOx	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRHP	National Register of Historic Place
O3	Ozone
OA	Operational Area
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHV	Off highway vehicle
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PDPM	Project Development Procedures Manual
PGAM	Peak Ground Acceleration Mean
PM_{10}	Respirable Particulate Matter 10 micrometers or less in diameter
$PM_{2.5}$	Fine Particulate Matter 2.5 micrometers or less in diameter
PRC	Public Resources Code
PV	Photovoltaic

ACRONYMS AND ABBREVIATIONS

R&D	Research and Development
RAMP	Recreation Area Management Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RMS	root mean squared
RMZ	Recreation Management Zones
ROG	Reactive Organic Gases
ROW	right of way
RPS	renewable performance standard
RTP	Regional Transportation Plan
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
S-1	Open Space/Recreation
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	California State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDNHM	San Diego Natural History Museum
SEMP	Special Events Management Plan
SEMS	Standardized Emergency Management System
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SOx	Sulfur Oxide
SR	State Route
SRMA	Special Recreation Management Area
SSAB	Salton Sea air Basin
STA	State Transit Assistance
SVRA	State Vehicular Recreation Areas
SWRCB	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
UPRR	Union Pacific Railroad
TDA	Transportation Development Act
TIA	Traffic Impact Analysis

ACRONYMS AND ABBREVIATIONS

TMDL	total maximum daily load
UPRR	Union Pacific Railroad
USACE	U.S. Army Corps of Engineers
USBRS	US Bicycle Route System
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
VRI	Visual Resources Inventory
VRM	Visual Resource Management
WSA	Water Supply Assessment
ZC	Zone Change
ZNE	Zero Net Energy

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1.0 EXECUTIVE SUMMARY

This Draft Environmental Impact Report (EIR) has been prepared for the Glamis Specific Plan Project (Project); a development project located in Imperial County, California. This document analyzes the potential environmental effects associated with implementation of the Project (including direct and indirect impacts, secondary impacts, and cumulative effects).

1.1. Purpose and Scope of the Environmental Impact Report

This Draft EIR has been prepared for the Imperial County Planning and Development Services Department (ICPDSD), with the County of Imperial (County) acting as the lead agency under California Environmental Quality Act (CEQA) Guidelines Sections 15050 and 15367, to analyze the potential environmental effects associated with implementation of the proposed Glamis Specific Plan Project.

An EIR is a public informational document used in the planning and decision-making process. The purpose of the EIR is to demonstrate that the County has made a good faith effort at disclosing the potential for the Project to result in significant impacts to the physical environment. As such, the EIR does not consider potential fiscal impacts, cost-benefit assessment, or social impacts. Nor does the EIR present recommendations to the decision-making bodies for approval or denial of the Project based on the environmental findings. Rather, the EIR is intended to provide additional information about the Project when, if, and at which time it is reviewed and considered by the County in its discretionary decision-making.

This Draft EIR provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the proposed Glamis Specific Plan Project. By recognizing the environmental impacts of the proposed project, decisionmakers will have a better understanding of the physical and environmental changes that would accompany the Project should it be approved. The Draft EIR includes recommended mitigation measures which, when implemented, would provide the lead agency with ways to substantially lessen or avoid significant effects of the Project on the environment, whenever feasible. Alternatives to the proposed project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the Project.

In accordance with Section 15082 of the CEQA Guidelines, the County prepared and distributed a Notice of Preparation (NOP) for the proposed Project that was circulated for public review in October 2020. The NOP comment period is intended to notify responsible agencies, trustee agencies, and the public that the County, acting as the lead agency, was going to prepare an EIR. The scope of the analysis for this EIR was determined by the County as a result of initial project review and consideration of agency and public comments received in response to the NOP. A copy of the NOP and comments received during the public comment period are included in Appendix A-1 to this Draft EIR.

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

1.2. Project Location and Setting

The Glamis Specific Plan Area (GSPA) is located on private land that is directly adjacent to the Imperial Sand Dunes Recreation Area (ISDRA) in an unincorporated area of Imperial County. It contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store. The Planning Area encompasses 143 acres and is composed of seven (7) parcels of land identified as assessor parcel numbers (APN) 039-310-017; -022; -023; -026; -027; -029; and -030. The Planning Area is regionally accessible via State Route 78 (SR 78) (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road, serves as a secondary access extending northwesterly for approximately 17 miles from SR-78 to Niland-Glamis Road. The eastern half of the Planning Area is also traversed by the Union Pacific Railroad (UPRR) which runs north and south and by Wash Road which parallels the UPRR south of SR-78.

1.3. Project Objectives

The location and historical recreational use of the GSPA is key to planning the GSPA. The Specific Plan Area designation in the County's General Plan establishes the intended general land use character. However, the Glamis community is unique in that it has served, and will continue to serve, as the premiere locale for hundreds of thousands of OHV riders and recreational visitors from around the world. The GSPA's location within the County, together with SR-78 bisecting the project site, the proximity to Interstate 8 to the south and the State of Arizona to the east, makes it a desirable location for recreational visitors to travel efficiently east or west. The GSPA attempts to build off the historical Glamis experience by providing expanded recreational, commercial, entertainment, and hospitality experiences while addressing environmental, engineering, commercial, public safety, and aesthetic needs that have been identified during the planning process. Finally, the GSPA will eliminate the need for special event-related annual CUPs and/or discretionary temporary event permits through implementation of a Special Events Management Plan (SEMP) notification that will include standards and protocols in accordance with the regulatory requirements of the County and key stakeholder agencies for regulation of special events.

The objectives for the GSP are the following:

- Create a man-made environment that is compatible with the natural environment, surrounding land uses, and the desert climate.

- Ensure that development within the GSPA is consistent with the County's General Plan and will protect public health, safety and general welfare, while complementing surrounding land uses and zoning.
- Provide design criteria that will guide developer(s) and the County in the development of proposed land uses by including descriptive text and illustrative exhibits setting forth the foundation of the overall development of the project site.
- Enable Special Events through implementation of a SEMP.
- Adhere to the Zoning Ordinance for the GSPA in Section 3, Zoning Ordinance.
- Provide recreational and ancillary facilities that serve the needs of the Glamis community and recreational visitors.

1.4. Project Synopsis

The proposed Specific Plan creates a distinctive masterplan for recreation-serving land uses which are consistent with the historical use of the GSPA. It provides for a great deal of flexibility as to the development of potential land uses within the GSPA to promote the concept of an open desert playground that derives from the "Camp RZR" event, historically held in October of each year at the GSPA, and the surrounding ISDRA. This area attracts hundreds of thousands of OHV enthusiasts every Halloween, Thanksgiving, Christmas, New Years, and President's Day weekend.

The GSPA consists of eight (8) Planning Areas. Planning Areas 1, 2, 3, and 4 would be zoned as Commercial-Recreation 3 (CR-3) (Figure 4-1, Proposed Zoning and Planning Areas). This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events. Planning Areas 5 and 6 would be zoned Commercial-Recreation 1 (CR-1). This zone is intended to allow small scale, low density development that will not enhance or contribute to the use of off-road vehicles on public highways or roads. This could include employee housing, research and development (R & D) facilities, Recreational Vehicle (RV) park with restrictions, and other similar uses.

Planning Area 7 is designated Commercial-Recreation 2 (CR-2). This designation is intended to accommodate recreational related commercial opportunities and projects that will support the Off Highway Vehicle (OHV) and recreational uses of the area at a higher density and allowable uses than CR-1 but still be limited to specific uses that are less intense and more occasional than those allowed in CR-3. This could include small repair shops, limited housing, RV park with restrictions and the like.

Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation. S-1 is used to recognize areas that embody the unique Open Space and Recreational character of Imperial County including the deserts, mountains and water-front areas. The S1 designation is primarily characterized by low intensity human utilization and small-scale recreation related uses.

As envisioned, the proposed Specific Plan will facilitate an entertainment enclave among the iconic dunes. This enclave will enhance the historic experiences that OHV riders and visitors expect when they visit the dunes.

The following is a brief description of the proposed land uses within the GSPA (Figure 4-2).

Recreational - The GSPA provides an opportunity for a variety of recreational activities to complement the established "Glamis" sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as OHV training, OHV rentals, etc.), amusement facilities, desert tours (off road experience), racetrack, shooting range, park/playground/picnic area, and other recreational-based activities.

Commercial/Retail - The GSPA will allow for a wide range of commercial and retail development, which include fuel stations, rental facilities, and sporting goods stores to accommodate the needs of visitors to the Glamis area. It may also provide for RV Park(s) to accommodate a small number of users that desire to have conveniences not found in open dry camping.

Storage - OHV and RV storage is an existing land use within the project vicinity. The GSPA will provide for storage for OHVs and RVs to allow visitors to store their vehicles at Glamis year around.

Entertainment - The Glamis area has long been known as the premier destination for OHV enthusiasts to enjoy their recreational activities within the world-renowned ISDRA. The GSPA will allow for a range of entertainment land uses whose purpose is to enhance the visitors experience to the Glamis area. Entertainment land uses could include an obstacle course, fireworks display area, and racetrack.

Hospitality - With an average annual attendance of 200,000 visitors to the Glamis area, the GSPA will provide for the development of various hospitality services to provide visitors with the accommodations they need to fully enjoy all that the Glamis area has to offer. Hospitality land uses may include medical services facility, mobile food trucks, tourist information center, public showers, public restrooms, and hotel/motel facilities.

Residential - The GSPA will allow for limited residential development to accommodate those who require temporary housing in Glamis. Housing will be developed in the form of guest, employee housing, seasonal private residences and temporary use of RVs.

Renewable Energy - Due to the remote location of the project vicinity, renewable energy facilities will be developed to provide electricity to the project vicinity. The GSPA will allow for the development of a solar generation facilities (including battery storage) located throughout the project vicinity (Figure 4-2).

Infrastructure Improvements - In order to properly accommodate the large volume of visitors to the project vicinity, existing water and wastewater facilities will need to be improved along with the

development of additional infrastructure. The GSPA will allow for the development of utility buildings, utility substation(s), and water/wastewater treatment facilities.

Research & Development Facility - The GSPA provides for a R&D facility that will take advantage of the close proximity of the ISDRA. This R&D facility will allow Polaris to test their equipment in a natural and private setting.

1.5. Summary of Significant Impacts and Mitigation Measures

Based on the analysis contained in Chapter 4 of this Draft EIR, the proposed Project would result in the potential for significant impacts to agricultural and forestry, air quality, biological resources, cultural resources, geology and soils, paleontological resources, hazards and hazardous materials, hydrology and water quality, public services, and tribal cultural resources. Mitigation measures have been identified which would reduce impacts to all resources to below a level of significance.

On the following page, Table 1-1 summarizes the potential environmental impacts of the Vikings Solar Battery Storage Project by impact area. It also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts and the level of significance after mitigation.

1.6. Environmental Effects Found not to be Significant

Several environmental topics were found to be less than significant without mitigation including agricultural and forest resources, mineral resources, recreation, and wildfires. These topics are described in Chapter 7.0, Environmental Effects Found not to be Significant.

1.7. Areas Of Controversy

Pursuant to CEQA Section 15123(b)(2), an EIR shall identify areas of controversy known to the lead agency, including issues raised by the agencies, and the public, and issues to be resolved. The NOP for the EIR was distributed on October 20, 2020. The 35-day public review and comment period began on October 20, 2020, and a scoping meeting was held on October 29, 2020. Public comments were received on the NOP that reflect controversy on several environmental issues.

Issues of controversy raised include concerns related to transportation and traffic. The NOP and comment letters received are included in this EIR as Appendix A-1.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 AESTHETICS			
Impact 5.1-1: Would the Project have a substantial adverse effect on a scenic vista?	Less than Significant.	**None**	Less than Significant.
Impact 5.1-2: Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant.	**None**	Less than Significant.
Impact 5.1-3: Would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant.	**None**	Less than Significant.
Impact 5.1-4: Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	Less than Significant.	**MM AES-1: Selection of Appropriate Solar Panels** Future renewable energy facilities would be required to select solar panels that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands.	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM AES-2: Glint and Glare Analysis for Solar Generating Facilities Future renewable energy facilities would be required to consider siting and design features that would minimize glint and glare and take appropriate actions. These actions include identifying glint and glare effects, assessing and quantifying these effects to determine potential safety and visual impacts, having qualified people conduct such assessments and identifying mitigation measures to address significant impacts. Methods to minimize night-sky effects include using minimum intensity lighting of an appropriate color consistent with safety needs, prohibiting strobe lighting except where it is required for safety; shielding all permanent lighting unless otherwise required for safety; mounting lighting so that light is focused downward; controlling lighting with timers, sensors, and dimmers; and using vehicle-mounted lights for nighttime maintenance work rather than permanently mounted lighting.	
5.2 AIR QUALITY			
Impact 5.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant.	**MM AQ-1: Dust Control Plan** Prior to the issuance of a grading permit or building permit, the project applicant shall be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM10emissions and associated mitigation measures during the construction and operational phases (see Rule801F.2) to ensure there would be no exceedances of the ICAPCD fugitive dust threshold. The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The 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	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the no greater than 20-percent opacity performance standard for dust control and address the following parameters: • All disturbed areas, including bulk material storage that is not being actively used, 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 groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing particulate matter with 5 percent or greater silt content. For modeling purposes, it was assumed that watering would occur twice daily. • All on-site unpaved roads segments or areas used for hauling materials shall be effectively stabilized. Visible emissions shall be limited to no greater than 20percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering. • The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways. • All track-out or carry-out on paved public roads, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment(including tires) that may then fall onto the pavement, 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.	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• 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 except where such material or activity is exempted from stabilization by the rules of ICAPCD.	
		MM AQ-2: NOX Emissions Controls Each project shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations at the time the proposals are brought forward. As of the date of publication of the Draft EIR, these measures include: • Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment. • Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum. • Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner). • 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. • Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts).	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.2-2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant.	**MM AQ-1** **MM AQ-2**	Less than Significant.
Impact 5.2-3: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant.	**None**	Less than Significant.
Impact 5.2-4: Would the Project expose sensitive receptors to substantial pollutant concentrations?	No Impact.	**MM AQ-1** **MM AQ-2**	No Impact.
5.3 BIOLOGICAL RESOURCES			
Impact 5.3-1: Would the Project have a substantial effect on candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant	**MM BR-1: Mitigation of Impacts to flat-tailed horned lizards and their habitat** Prior to construction of each Specific Plan activity, a Capture/Relocation Plan for flat-tailed horned lizard shall be prepared by a qualified biologist. The plan shall include preconstruction survey and monitoring methods, capture and relocation methods, and suitable relocation areas. The Capture/Relocation Plan may include additional protection measures during construction including: • Creating areas of land or small paths/culverts between project facilities for wildlife movement; • Installing silt fencing around work areas to prevent migration of adjacent wildlife into impact areas;	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Installing pitfall traps in spring/summer/fall to trap any individuals that remain on the site for removal from work areas); and/or • Biological monitoring during construction to inspect fencing and pitfall traps and relocate wildlife species out of harm's way, if required. The Capture/Relocation Plan shall be submitted to an approved by CDFW and the County of Imperial (or an agency delegated to oversee this program).	
		MM BR-2: Mitigation of Impacts to Jurisdictional Waters A jurisdictional delineation survey shall be performed to determine potential jurisdictional resources under Section404/401 of the CWA Section 1600-1616of the California Fish and Game Code, and the Porter-Cologne Water Quality Control Act for any activities that may substantially divert or obstruct the natural flow of or deposit debris, waste or other materials into any river, stream or lake. Current USACE delineation procedures and guidance consistent with "A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States" (Lichvar and McColley 2008) should be used to identify and delineate any wetlands or waters of the U.S.(WoUS) or both that may be subject to USACE and RWQCB jurisdiction (Lichvar et al. 2016; USACE 1987, 2008). Likewise, current CDFW procedures and guidance shall be used to identify and delineate any streambeds, rivers, or associated riparian habitat potentially subject to CDFW jurisdiction (California Fish and Game Code 2019). Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment),enhancement, preservation, and/or and restoration at a minimum of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or restoration effort shall be	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		implemented pursuant to a Habitat Restoration Plan (HRP), which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies and County of Imperial. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Temporarily impacted drainage features shall be recontoured to preconstruction conditions. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly. A biological monitor shall be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking will be used to clearly define the work area boundaries and avoid impacts to adjacent drainage features. Erosion protection and sediment control best management practices (BMPs)shall be implemented in compliance with the General Construction General Permit and the Stormwater Pollution Prevention Plan (SWPPP). Graded areas would be stabilized to promote infiltration and reduce run-off potential. Any excess soil would be spread on site outside of jurisdictional drainages.	
Impact 5.3-2: Would the Project have a substantial adverse effect on	Less than Significant.	**None**	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
riparian habitat or other sensitive natural community.			
Impact 5.3-3: Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant.	**MM BIO-2**	Less than Significant.
Impact 5.3-4: Would the Project substantially interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant.	**MM BIO-3 Nesting Bird Surveys** If activities associated with vegetation removal, construction, or grading are planned during the bird nesting/breeding season (generally February 1 through August 31; January 1 for raptors), a qualified biologist shall conduct pre-construction surveys for active nests in all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures, at the appropriate time of day/night, and during appropriate weather conditions. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior (e.g., copulation, carrying of food or nest materials, nest building, flushing suddenly from atypically close range, agitation, aggressive interactions, or other behaviors). Preconstruction nesting bird surveys should be conducted weekly beginning 14 days prior to initiation of ground-disturbing activities, with the last survey conducted no more than three (3) days prior to the start of clearance/construction work. If ground-disturbing activities are delayed, additional preconstruction surveys should be conducted so that no more than 3 days have elapsed between the survey and ground-disturbing activities. If active	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		nests are identified, the biologist shall establish suitable buffers around the nest and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. The buffer should generally be a minimum of 300 feet for reports and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species.	
Impact 5.3-5: Would the Project conflict with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?	Less than Significant.	**MM BIO-1** **MM BIO-2**	Less than Significant.
Impact 5.3-6: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact.	**None**	No Impact.
5.4 CULTURAL RESOURCES			
Impact 5.4-1: Would the Project result in a change in the significance of an historical resource?	Potentially Significant	**MM CR-1: Cultural Resources Construction Monitor** A cultural resources monitor shall be present during all excavation or other earth-moving activities within the Project site. The applicant shall immediately notify the Imperial County Planning and Development Services Department if any undocumented and/or buried prehistoric or historic resource is uncovered. All construction must stop in the vicinity of the find until the find can be evaluated for its eligibility for listing in the CRHR. The cultural resources monitor shall have the authority to halt construction activity in the immediate	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		vicinity of the encountered historic resource for a sufficient interval of time to allow avoidance or recovery of the encountered historic resources and shall also have the authority to redirect construction equipment in the event that any cultural resource is inadvertently encountered. All cultural resources are assumed to be eligible for the CRHR until determined otherwise by the monitor. Work will not resume in the area of the discovery until authorized by the monitor.	
		MM CR-2: Establishment of Environmentally Sensitive Areas A qualified archaeologist, as approved by the County, will prepare an archaeological testing and evaluation plan prior to conducting any field work. If an archaeological site is determined significant under CEQA, avoidance is recommended by establishing Environmentally Sensitive Areas (ESAs). ESAs shall encompass the site boundary plus a 200-foot buffer around the site. ESAs should be staked and/or flagged in a conspicuous manner. Spot checking by a qualified archaeologist shall be completed throughout construction to ensure ESAs are not entered. If it is necessary for the Project to encroach on any ESA, full time monitoring by a qualified archaeologist, who is approved by the County, will be required to ensure there are no impacts to the archaeological site. If avoidance is not an option, then a data recovery program should be undertaken.	
		MM CR-3: Data Recovery Program The proposed Specific Plan was designed to avoid and preserve archaeological resources in place where possible. Where avoidance and preservation are not possible, data recovery through excavation is the most feasible mitigation. Prior to excavation, a data recovery plan must be prepared that makes provision for adequately recovering the scientifically consequential information from and about the historical resource. Data recovery includes the documentation, recordation, and	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		removal of the archeological deposit from a project site in a manner consistent with professional (and regulatory) standards; and the subsequent inventorying, cataloguing, analysis, identification, dating, interpretation of the artifacts and "ecofacts" & the production of a report of findings.	
Impact 5.4-2: Would the Project Disturb archaeological resources and remains?	Potentially Significant	**MM CR-1** **MM CR-2** **MM CR-3**	Less than Significant.
Impact 5.4-3: Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant	**MM CR-4: Unanticipated Discovery – Human Remains** In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery will be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC within 24-hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant (MLD) from the deceased Native American (Section 5097.98 of the PRC). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB-2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB-2641).	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.5 ENERGY			
Impact 5.5-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	None	Less than Significant
Impact 5.5-2: Would the Project Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant.	None	Less than Significant.
5.6 GEOLOGY AND SOILS			
Impact 5.6-1: Would the Project result in substantial adverse effects from the rupture of a known earthquake fault?	Less than Significant.	None.	Less than Significant.
Impact 5.6-2: Would the Project result in substantial adverse effects from strong seismic ground shaking?	Potentially. Significant	**MM GEO-1 Retain qualified professional staff for design** a. A qualified professional should design any permanent structure constructed on the site. The minimum seismic design should comply with the CBC in effect at the time specific developments are proposed. b. Preventative measures to reduce seasonal flooding and erosion should be incorporated into site grading plans. Dust control should also be implemented during construction. Site grading should be in strict compliance with the requirements	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		of the South Coast Air Quality Management District [SCAQMD]. c. Preventative measures to reduce collapse should be incorporated into site grading plans. Storm drainage should flow away from foundations per the minimum building code regulations and water conduits should be repaired immediately or the design should follow the potential for maximum collapse not based on an active water depth as assumed in this report. Water introduction into the subsurface should be kept well away from planned structures and improved areas. **d.** Proper geotechnical observation and testing during construction is imperative to allow the geotechnical engineer the opportunity to verify assumptions made during the design process, to verify our geotechnical recommendations from future design-level studies have been properly interpreted and implemented during construction and as required by the CBC in effect at the time of construction. Observation of fill placement by the Geotechnical Engineer of Record should be in conformance with the CBC in effect at the time.	
Impact 5.6-3: Would the project result in substantial adverse effects from seismic-related ground shaking including liquefaction?	Less than Significant.	None	Less than Significant.
Impact 5.6-4: Would the Project result in substantial adverse effects from landslides?	No Impact.	None	No Impact.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.6-5: Would the Project result in substantial soil erosion or the loss of topsoil?	Less than Significant.	None	Less than Significant.
Impact 5.6-6: 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?	Less than Significant.	None	Less than Significant.
Impact 5.6-7: Would the Project result in the potential for substantial risks to life or property due to expansive soils?	Less than Significant.	None	No Impact.
Impact 5.6-8: Would the Project directly or indirectly destroy a unique paleontological resource, site or unique geologic feature?	Less than Significant.	None	Less than Significant.
5.7 GHG EMISSIONS			
Impact 5.7-1: Would development of the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant.	**None**	No Impact.
Impact 5.7-2: Would the Project conflict with an applicable plan or policy or regulation adopted for the	Less than Significant.	**None**	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
purpose of reducing the emissions of greenhouse gases?			
5.8 HAZARDS AND HAZARDOUS MATERIALS			
Impact 5.8-1: Would the Project result in the creation of a significant public hazard from the routine transport, use, or disposal of hazardous materials?	Less than Significant.	**None**	Less than Significant.
Impact 5.8-2: 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?	Less than Significant	**None**	Less than Significant.
Impact 5.8-3: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	Less than Significant.	**None**	Less than Significant.
Impact 5.8-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project result in a safety hazard	Less than Significant.	**None**	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
for people residing or working in the Project area?			
Impact 5.8-5: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant.	**None**	Less than Significant.
Impact 5.8-6: Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires?	Less than Significant.	**None**	Less than Significant.
5.9 HYDROLOGY AND WATER QUALITY			
Impact 5.9-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Potentially Significant.	**MM HWQ-1: Prepare SWPPP and Implement BMPs Prior to Construction** For each implementation activity that is greater than one-acre in size, the project applicant or its contractor shall prepare a SWPPP specific to the project and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity(Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by the project applicant prior to commencement of work and shall be made conditions of the contract with the contractor selected to build and decommission the project. The SWPPP(s) shall incorporate control measures in the following categories:	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching). • Flow diversion practices, if required (Mitigation Measure HWQ-2). • Sediment control practices (temporary sediment basins, fiber rolls). • Temporary and post-construction on- and off-site runoff controls. • Special considerations and BMPs for water crossings, wetlands, and drainages. • Monitoring protocols for discharge(s) and receiving waters, with emphasis place on the following water quality objectives: dissolved oxygen, floating material, oil and grease, pH, and turbidity. • Waste management, handling, and disposal control practices. • Corrective action and spill contingency measures. • Agency and responsible party contact information. • Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP. The SWPPP shall be prepared by a qualified SWPPP practitioner with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. BMPs for soil stabilization and erosion control practices and sediment control practices will also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.	
		MM HWQ-2: Properly Dispose of Construction Dewatering in Accordance with the Construction General Permit (SWRCB Order No. 2009-0009-DWQ and Associated Amendments) If required, all construction dewatering shall be discharged or utilized for dust control in accordance with the Construction General Permit. The Storm Water Pollution Prevention Plan shall provide Best Management Practices to be implemented if groundwater is encountered during construction.	
		MM HWQ-3: Incorporate Post-Construction Runoff BMPs into Project Drainage Plan. A Drainage Plan/Drainage Report shall be prepared for each future development activity under the GSP. The project Drainage Plan shall adhere to guidelines in the County's Engineering Guidelines Manual, or whatever regulations are in place at the time of project implementation, to control and manage the on- and off-site discharge of stormwater to existing drainage systems and shall include a project description, project setting including discussions of existing and proposed conditions, any drainage issues related to the site, summary of the findings or conclusions, off-site hydrology, onsite hydrology, hydraulic calculations and a hydrology map. The drainage study and specifications for improvements of all drainage easements, culverts, drainage structures, and drainage channels shall be provided to the DPW for approval. Required plans and specifications shall provide a drainage system capable of handling and disposing of all surface waters originating within the subdivision and all surface waters that may flow onto the subdivision	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		from adjacent lands. Said drainage system shall include any easements and structures required by the DPW or the affected Utility Agency to properly handle the drainage on site and off site. The report should detail any vegetation and trash/debris removal, as well as address any standing water. Infiltration basins will be integrated into the Drainage Plan to the maximum extent practical. The Drainage Plan shall provide both short- and long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.	
		MM HWQ-4 Comprehensive Drainage and Sedimentation Control Plan. A Comprehensive Drainage and Sedimentation Plan (Plan) shall be prepared for all future development activities under the GSP, prior to the initiation of construction prior to the issuance of a grading and/or building permit. Detailed hydrologic analysis shall be performed prior to final design. Results of these analyses will be submitted to the County for review. All proposed grading and impervious surfaces on site shall be reviewed and approved by the County with respect to its potential to cause or result in additional erosion and sedimentation, increased stormwater flows, or altered drainage patterns that could lead to unintentional ponding or flooding on site or downstream, and/or additional erosion and sedimentation. The Plan shall include, but not be limited to, the following measures: Construction of access corridors and temporary and permanent access roads shall not block existing drainage channels and shall not significantly alter the existing topography. The project proponent shall delineate the active drainage channels and avoid placement of proposed flood protection berms within active	

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		drainage channels. The drainage avoidance areas shall protect no less than 90 percent of the area of the active drainage channels from construction impacts. A hydraulic analyses shall be prepared for each future development activity that estimates the pre- and post- development peak discharges, water depths, and velocities for both smaller, more frequent events (2-, 5-, and 10-year events), as well as larger design storm events (100-year event) that would flow through each future project site, drainage avoidance area, and/or on either side of each proposed flood protection berm. The County shall be provided design details for the flood protection berms including subgrade preparation, construction methods, and armoring or scour protection.	
Impact 5.9-2: 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?	Less than Significant.	**None**	Less than Significant.
Impact 5.9-3a: 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 result in substantial erosion or siltation on- or off-site?	Less than Significant.	**None**	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.9-3b: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less than Significant.	**None**	Less than Significant.
Impact 5.9-3c: 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	Less than Significant.	**None**	Less than Significant.
Impact 5.9-4: Would a Project located in a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant.	**None**	No Impact.
Impact 5.9-5: Would the Project conflict with or obstruct implementation of a water quality	Less than Significant.	**None**	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
control plan or sustainable groundwater management plan?			
5.10 LAND USE AND PLANNING			
Impact 5.10-1: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact.	**None**	No Impact.
5.11 NOISE			
Impact 5.11-1: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels?	Less than Significant.	**None**	Less than Significant.
Impact 5.11-2: Generation of excessive groundbourne vibration or groundbourne noise levels?	Less than Significant.	**None**	Less than Significant.
5.12 POPULATION AND HOUSING			
Impact 5.12-1: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 road or other infrastructure)?	Less than Significant.	None	Less than Significant.

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.13 PUBLIC SERVICES			
Impact 5.13-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire or police protection services?	Less than Significant	**None**	Less than Significant.
5.14 TRANSPORTATION AND TRAFFIC			
Impact 5.14-1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	**MM T-1: Traffic-related Improvements** Construct the future intersection of SR-78 / Glamis Mainstreet per the sketch provided in Appendix F in the applicant prepared traffic study. • Conduct an annual signal warrant assessment at the future intersection of SR-78 / Glamis Mainstreet to determine when / if signalization should be implemented. • Install fencing along SR-78 to limit vehicle access to the Specific Plan areas to established intersections. • An OHV tunnel running under SR-78 connecting the northern and southern portions of the GSPA is recommended to be constructed at the time the Planning Areas north of SR-78 are developed. • Access to Planning Areas 5 and 6, just east of the UPRR, via SR-78 will be required. Given the very low expected traffic volumes, signalization of the intersection is likely not needed, however, dedicated left-turn lanes onSR-78 are recommended.	Less than Significant

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• A secondary emergency only access point to/from the GSPA to SR-78shallbe provided on the west side of the GSPA.	
Impact 5.14-2: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) relative to Vehicle Miles Traveled?	Less than Significant	**MM T-1**	Less than Significant
Impact 5.14-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	**MM T-1**	Less than Significant
Impact 5.14-4: Would the Project result in an inadequate emergency access?	Less than Significant	**MM T-1**	Less than Significant
5.15 UTILITIES AND SERVICE SYSTEMS			
Impact 5.15-1: 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?	Less than Significant	**None**	Less than Significant
Impact 5.15-2: Would the Project have sufficient water supplies available to serve the project and	Less than Significant	**None**	Less than Significant

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
reasonably foreseeable future development during normal, dry and multiple dry years?			
Impact 5.15-3: Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments	Less than Significant	**None**	Less than Significant
Impact5.17-4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	**None**	Less than Significant
5.16 TRIBAL CULTURAL RESOURCES			
Impact 5.16-1: Would the Project cause a substantial adverse change in the significance of a Tribal Cultural Resource?	Impact 5.16-1: Would the Project cause a substantial adverse change in the significance of a Tribal Cultural Resource?		
Impact 5.16-2: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe	Impact 5.16-2: Would the Project cause a substantial adverse change in the significance of a tribal cultural		

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
determined to be significant the County of Imperial?	resource with cultural value to a California Native American tribe determined to be significant the County of Imperial?		

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

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

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

1.9 Project Alternatives

The Alternatives section (Chapter 8.0) of this Draft EIR focuses on alternatives capable of avoiding or substantially lessening any of the significant effects of the Project, even if the alternatives would impede, to some degree, the attainment of project objectives. The Alternatives section discusses the Project alternatives that were determined to represent the range of reasonable alternatives to the Project that have the potential to feasibly attain most of the basic Project objectives, but which may avoid or substantially lessen one or more the Project's significant effects. A brief summary is provided below.

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

The No Project/No Development Alternative assumes that the Project, as proposed, would not be implemented and the Project site would not be developed. The No Project/No Development Alternative would not meet any of the Project objectives.

1.9.2 Modified Footprint Alternative (Alternative A)

An alternative site plan (Alternative A) for the proposed Specific plan was developed that avoids all development of the existing RV storage facility which is located in Areas 2 and 3 and are proposed for a change in zoning to Commercial Recreation (C-3). This alternative is being considered due to the length of the current lease, 30 years, for the existing RV storage facility. This alternative is being considered to evaluate the feasibility of developing the proposed Specific Plan.

1.9.3 Environmentally Superior Alternative

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

Table 1-2 summarizes the potential impacts of the alternatives evaluated as compared to the potential impacts of the Project.

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

Environmental Resource	Proposed Project	No Project/ No Expansion (Alternative 1)	Modified Project Footprint (Alternative A)
1. Aesthetics	LTS-MM	NI / +	LTS-MM / =
2. Air Quality	LTS-MM	NI / +	LTS-MM / =
3. Biological Resources	LTS-MM	NI / +	LTS-MM /=
4. Cultural Resources	LTS-MM	NI / +	LTS-MM / =
5. Energy	LTS	NI / +	LTS
6. Geology and Soils	LTS-MM	NI / +	LTS-MM / =
7. Greenhouse Gas Emissions	LTS	NI / -	LTS / =
8. Hazards and Hazardous Materials	LTS-MM	NI / +	LTS-MM / =
9. Hydrology and Water Quality	LTS-MM	NI / +	LTS-MM / =
10. Land Use and Planning	LTS	NI / +	LTS / =
11. Noise	LTS	NI / +	LTS / =
12. Population and Housing			
13. Public Services	LTS-MM	NI / +	LTS-MM / =
14. Transportation and Traffic	LTS-MM	NI / +	LTS-MM / =
15. Utilities and Service Systems			
16. Tribal Cultural Resources	LTS-MM	NI / +	LTS-MM / =
		+ 15 - 1 = 0	+ 1 - 0 = 15
Meets Most of the Basic Project Objectives?	Yes	No	Yes

Notes:
NI: Finding of no environmental impact
LTS: Finding of less than significant environmental impact
LTS-MM: Finding of less than significant environmental impact with mitigation measure
SU: Finding of significant and unmitigable impact
+Alternative is superior (reduced impacts compared) to the proposed Project
-Alternative is inferior (greater impacts compared) to the proposed Project
=Alternative is environmentally similar to the proposed Project or there is not enough information to make a superior or inferior determination.

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2.0 INTRODUCTION

2.1. Purpose of the Draft EIR

The County of Imperial (County) is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing the Environmental Impact Report (EIR) for the proposed Glamis Specific Plan (the Specific Plan) (State Clearinghouse No. 2020100348). This EIR has been prepared in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq); the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000 et. Seq); and the County of Imperial CEQA Regulations (Imperial County, 2017). The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Content of an EIR).

In accordance with Section 15121 of the CEQA Guidelines, a primary purpose of this EIR is to provide decision-makers and the public with specific information regarding the environmental effects associated with the Project, identify ways to minimize the significant effects and describe reasonable alternatives to the Project. Mitigation measures are provided in order to reduce the significance of impacts resulting from the Project, as are alternatives to the Project. In addition, this EIR is the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project.

The County, which has the principal responsibility of processing and approving the Project, will use and consider information in this EIR, along with other information that may be presented during the CEQA process, during the decision to approve, disapprove, or modify the Project. Significant environmental impacts cannot always be mitigated to a level considered less than significant; in those cases, impacts are considered significant and unavoidable. In accordance with Section 15093(b) of the CEQA Guidelines, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency shall state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is termed, per Section 15093(b) of the CEQA Guidelines, a "statement of overriding considerations."

This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the current proposed actions, as required by Section 15146 of the CEQA Guidelines. This analysis considers the actions associated with the Project, to determine the short-term and long-term effects associated with their implementation. This EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. CEQA requires the preparation of an objective, full disclosure document to inform agency decision makers and the general public of the direct and indirect environmental effects of the Project; provide mitigation measures to reduce or eliminate

significant adverse effects; and identify and evaluate reasonable alternatives to the Project that can reduce or eliminate significant adverse effects of the Project.

2.2. Program EIR

This EIR has been prepared as a Program EIR because the Glamis Specific Plan constitutes a series of actions that can be characterized as one large project that is related: "a) geographically; b) as logical parts in a chain of contemplated actions; and c) in connection with the issuance of…plans…to govern the conduct of a continuing program…" (CEQA Guidelines 15168[a]). A Program EIR generally establishes a foundation for "tiered" or project-level environmental documents that may be subsequently prepared in accordance with the overall program. According to CEQA Guidelines Section 15168(b), a Program EIR can provide the following advantages:

- Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action;
- Ensure consideration of cumulative impacts that might be slighted in a project-level analysis;
- Avoid duplicative reconsideration of basic policy considerations;
- Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at the earliest possible time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and
- Allow a reduction in paperwork.

The Program EIR analyzes, at a general level, the maximum extent of potential development scenarios within the Specific Plan area, policies, development standards and protocols. In this way, decision-makers and the public can get a sense of the overall physical effects of the whole Project. The purpose of the Program EIR is to focus attention to those aspects of a future project (often a long-range plan) that could bring about adverse physical impacts. A Program EIR in this way serves as a foundation for subsequent environmental documentation and/or clearance. CEQA Guidelines Section 15146 indicates that "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR."

The Program EIR identifies and analyzes the potential environmental impacts of the program- wide policies and management actions presented in the Specific Plan, and proposes mitigation measures to reduce impacts determined to be significant. With the Program EIR, the County and the public will be able to consider the Project in its entirety and the impacts of associated with policies and management actions in the Specific Plan, some of which might be overlooked if considered on a case-by-case basis. The Program EIR also allows for consideration of broad policy alternatives and their possible environmental effects in a more exhaustive manner than would otherwise be possible. Optimally, this process allows for development of program-wide mitigation measures at a stage

when the County has greater flexibility to deal with basic problems or cumulative environmental impacts, and provides an opportunity to reduce paperwork. Program-level analysis differs from project-level analysis, which is based on evaluation of detailed site-specific development plans and proposals.

2.3. Tiering

Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or specific plan) with later environmental documents on narrower projects, incorporating by reference the general discussions from the broader EIR. Where a Lead Agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a specific plan, the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

Approval of the Specific Plan itself would not directly result in any specific development project. However, the environmental analysis and mitigation measures provided within Chapter 5.0, Environmental Analysis, have been prepared utilizing a programmatic approach under CEQA, intended to provide the opportunity for tiering (per Section 15152 of the CEQA Guidelines) when future development applications are received. As a Program EIR, it should be understood that certain of the impacts identified, and the mitigation measures recommended in this document, are inherently limited in their specificity. As such, future developments within the Specific Plan area would need to be reviewed in the context of this Program EIR to determine if additional environmental documentation would be required. If subsequent individual project proposals would result in environmental impacts that have not been addressed in this Program EIR, additional environmental review would be required. If additional impacts are not identified and no new mitigation measures would be required, the subsequent individual project could be approved without additional environmental documentation. If an EIR were required for a subsequent individual project, the EIR should implement the applicable mitigation measures developed in this Programmatic EIR and focus its analysis on specific environmental impacts that were not previously addressed.

With subsequent environmental review, this Program EIR will be used as the basis for Initial Study (IS) determinations of impact significance, to focus subsequent project review, if required, on only those effects not adequately considered before, and to incorporate relevant information and analysis by reference.

2.4. Issues to be Resolved

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

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

2.5. Definitions of Key Terms

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

- **Project** means the whole of an action that has the potential to result in a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.
- **Environment** means the physical conditions that exist in the area and would be affected by the proposed Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is that in which significant direct or indirect impacts would occur as a result of the proposed Project. The environment includes both natural and man-made (artificial) conditions.
- **Impacts** analyzed under CEQA must be related to a physical change. Impacts are:
  - Direct or primary impacts that would be caused by a project and would occur at the same time and place; or
  - Indirect or secondary impacts that would be caused by a project and would be later in time or further removed in distance, but that would still be reasonably foreseeable. Indirect or secondary impacts may include growth-inducing impacts and other impacts related to induced changes in the pattern of land use, population density, growth rate, or related effects on air and water and other natural systems, including ecosystems.
- **Significant Impact on the Environment** means a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by the proposed Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. An economic or social change by itself is not

considered a significant impact on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

- **Mitigation** consists of measures that avoid or substantially reduce the proposed Project's significant environmental impacts by:
  - Avoiding the impact altogether by not taking a certain action or parts of an action;
  - Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
  - Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
  - Reducing or eliminating the impact over time through preservation and maintenance operations during the life of the action; or
  - Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.
- **Cumulative impact** refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
  - The individual impacts may be changes resulting from a single project or separate projects.
  - The cumulative impact from several projects is the change in the environment which results from the incremental impact of the proposed Project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period.

This EIR uses a variety of terms to describe the level of significance of adverse impacts. These terms are defined as follows:

- A designation of "No Impact" indicates no adverse changes to the environment are expected.
- A "Less than Significant Impact" will not cause a substantial adverse change to the environment.
- A "Less than Significant Impact with Mitigation Incorporated" avoids a substantial adverse impact on the environment through adoption of mitigation measures.
- A "Significant and Unavoidable Impact" is a substantial adverse effect on the environment that cannot be reduced to a less than significant level even with the implementation of feasible mitigation measures.

2.6. Agency Roles and Responsibilities

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

2.6.1. Lead Agency

The County of Imperial (County) is the lead agency for the environmental review and certification of the EIR for the Glamis Specific Plan. The County will be required to consider a General Plan Amendment for development of the Specific Plan (SP 19-0001); a Zone Change (#19-0006) that would change the zoning within the Planning Area from C-2 (Medium Commercial) and S-2 (Open Space/Preservation) to CR-1, CR-2, and CR-3 (Commercial Recreation) and S-1 (Open Space/Recreation); and a permit for a new public water system well to increase the annual water withdrawal to 25 acre-feet per year. The County will also be responsible for certification of the EIR.

The Specific Plan would implement the County's objectives for the development of this area (Imperial County, 2015) which are to:

- Accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities;
- Coordinate specific plan with the Bureau of Land Management and affected local agencies; and
- Provide public services to the specific planning area concurrent with the need.

The Specific Plan would also eliminate with the need for conditional use permits for special events.

2.6.2. Responsible and Trustee Agencies

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

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

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

Federal

- U.S. Army Corps of Engineers (USACE)

State

- California Department of Transportation (Caltrans)
- California Department of Fish & Wildlife (CDFW)
- California Department of Public Health
- State Water Resources Control Board (SWRCB)
- California Regional Water Quality Control Board (RWQCB), Region 7

Regional and Local

- Imperial County Department of Public Health (DPH)
- Imperial County Air Pollution Control District (ICAPCD)
- Imperial County Department of Public Works (DPW)

The specific approvals anticipated to be required from the lead agency, trustee agencies, and/or responsible agencies are listed in Table 4-1.

2.7. Environmental Review Process

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

The CEQA process for this EIR includes:

- Preparation of an IS which determined that the proposed Project requires preparation of an EIR;
- Filing and distribution of the Notice of Preparation (NOP);
- Holding a CEQA public agency scoping meeting;

- Preparation of the Draft EIR;
- Release of the Draft EIR for public review;
- Preparation and release of the Final EIR, including responses to comments on the Draft EIR

2.7.1. Notice of Preparation and Initial Study

In accordance with Section 15082 of the CEQA Guidelines, the ICPDSD issued a NOP of an EIR for the Project and an accompanying IS (SCH# 2020100348) (Appendices A-1 and A-2, respectively). The NOP was published in the *Imperial Valley Press* newspaper on October 20, 2020, and was submitted to federal, state, and local agencies and other interested parties for a 35-day public review period beginning on October 20, 2020, and ending on November 24, 2020.

In response to the NOP, the County received comment letters from the following agencies: Caltrans, CDFW, and the Native American Heritage Commission (NAHC). **Table 2-1** summarizes written comments received during the public scoping process.

2.7.2. Public Scoping Meeting

One public scoping meeting was held by the County of Imperial to solicit input from governmental agencies, non-governmental organizations, and the public regarding the proposed Project, alternatives, mitigation measures, and environmental impacts to be analyzed in the EIR. The meeting was held on Thursday, October 29th, 2020, at 6:00 p.m. in the County Administrative Center, Board Chambers, El Centro, California. No members of the public attended the scoping meeting and no oral and/or written comments were received. Copies of the Scoping Meeting Materials are presented in Appendix B.

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) – NOVEMBER 24, 2020	
Implementation of the Glamis Specific Plan may impact Caltrans' Right-of-Way (ROW) in the future. Future projects should be based upon the Program EIR and have elements and/or mitigation measures for changes to Caltrans ROW. Caltrans welcome the opportunity to be a Responsible Agency under CEQA and to continue coordination of our efforts.	• Section 2.4.2, Responsible and Trustee Agencies • Table 2-3, • Section 5.14, Transportation
Traffic Engineering and Analysis	
In accordance with Senate Bill (SB) 743 public agencies are required to use Vehicle Miles Traveled (VMT) to	• Section 5.14, Transportation

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
evaluate transportation impacts associated with development. Please provide a traffic impact study using the Caltrans-Vehicles Miles Traveled-Focused-Transportation Impact Study Guide -May 20, 2020. Provide a Vehicle Miles Traveled (VMT) analysis for the Polaris Glamis Specific Plan Traffic Study.	• Traffic Impact Report (App. L)
Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA is available online at http://opr.ca.gov/ceqa/updates/sb-743/.	• Section 5.14, Transportation
Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at Glamis Main Street on Figure 8 of the Draft Study & Environmental Analysis of the Glamis Specific Plan dated October 2020.	• Section 5.14, Transportation • Traffic Impact Report (App. L)
Comments on Environmental Initial Study	
• Description of Project – The brief description of the proposed land uses does not account for other land uses that are mentioned in the project trip generation.	• Chapter 4.0, Project Description
• Please revise the project trip generation "Table A" (provided by Polaris' Consultant) to include the following: Fuel station, rental facilities, entertainment and hospitality uses, sporting goods stores, adventure center, amusement facilities, movie theater, obstacle courses, fireworks and light display area and racetrack.	• Section 5.14, Transportation • Traffic Study (App. L)
• Page 43 - Section XVII Transportation/Traffic – Caltrans does not concur that the impacts from the Polaris development will result in Less Than Significant impacts. The full environmental process and determination of impacts under CEQA will describe the project impacts and mitigations.	• Section 5.14, Transportation • Traffic Study (App. L)
• Page 44 - Discussion c) Less than Significant Impact. Add sentences to mention the Intersection Control Evaluation (ICE) requirements in addition to the proposal of a signal at the intersection.	• Section 5.14, Transportation • Traffic Study (App. L)

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
Comments on Environmental Initial Study	
• Page 3-1 - Sections 1.0 and 2.0 appear to be missing.	Chapter 1.0 and 2.0, Executive Summary and Introduction
• Page 4-2 - Section 4.2 - Proposed Project Section – Paragraph 2 - "This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands." Does Bureau of Land Management (BLM) support large variety of commercial uses adjoining Federal lands?	Comment Noted. The planning area is under the jurisdiction of the County of Imperial. No BLM approvals are required for implementation.
• Page 4-4 - Hospitality – "With an average annual attendance of 200,000 visitors to the Glamis area." According to the Visitation Data provided by LLG Engineers, the annual attendance for 2019 was over 600,000 for this area.	Chapter 4.0, Project Description
• Page 4-7 – Section 4.3 - Project Components – "In compliance with CEQA, only those components of the proposed Glamis Specific Plan that would have the potential to result in potential environmental effects are addressed in this EIR." Impacts to the transportation network need to be addressed as well.	Section 5.14, Transportation
• Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 stated "There are a total of 6 proximate vehicular access points to the project vicinity with a gateway feature on SR-78 (Figure 4-3)". The entire stretch for vehicular access west of the proposed signalized intersection will be required to have a fence installed along SR-78. • Justify the need to have additional accesses if the proposed signalized Glamis Mainstreet intersection is not enough for Area 1. • Each of these requested accesses will need to be evaluated as they could potentially create illegal crossings of SR-78.	• Chapter 4.0, Project Description • Section 5.14, Transportation
• Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 - "There are a total of 6 proximate vehicular access point to the project vicinity with a gateway feature on SR-78 (Figure 4-3)." Clarify the type of gateway and the installation location.	Chapter 4.0, Project Description

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
• Non-essential highway appurtenances like a gateway will need to be 52 feet from the edge of travel way.	
• Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 2 - "…To accommodate the anticipated vehicular traffic flow, the applicant has proposed a conceptual intersection plan with proposed cross-sections subject to final design and approval from Caltrans (Figure 4-4)." Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at this intersection for review. Operations Policy Directive #13-02 can be provided upon request. • "The Glamis Specific Plan proposes a transportation concept that proposes a significant level of expansion of the State Highway System, and close coordination with Caltrans will be required. Caltrans has made no determination on the proposed concepts.	Chapter 4.0, Project Description
• Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 3 - All proposed accesses along SR-78 for the proposed development Area 1-8 will need to be improved to meet Caltrans latest driveway standards with acceleration and deceleration lane based on the proposed development phasing (safety).	Chapter 4.0, Project Description
• Page 4-11 Circulation Plan - "The project vicinity includes the Sand Highway that runs parallel to SR-78 along the northwestern edge of Planning Area 1." Is there a plan for separating the "Sand Highway" from SR-78 using physical barriers such as K-rail, fencing, or other means? • Please specify location of signs and under whose authority signs will be posted.	Chapter 4.0, Project Description
• Page 4-26 - Table 4-2 "Anticipated Land Use Changes Through 2051/2071. Please include the growth rate used for the proposed traffic ADT in the report. Also, include this future growth volume in the future project traffic trips scenario in the Traffic Impact Analysis (TIA).	Section 5.14, Transportation

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
• Page 4-27 – Section 4.4 Project Phasing - "… the earliest construction beginning in late 2021. No uses would be opened prior to 2022 (opening year). The build-out year would be 2051 /2071." What are the phases of the project to be constructed between 2021 and 2051?	Chapter 4.0, Project Description
• 1. The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments.	Chapter 4.0, Project Description
• 2. In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances.	Chapter 4.0, Project Description
• 3. The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections.	Chapter 4.0, Project Description
• 4. Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17.	Chapter 4.0, Project Description
• 5. If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation.	Chapter 4.0, Project Description
• 6. New access points along the right of way may need to be evaluated based on access controlled guidance.	Chapter 4.0, Project Description
• 7. If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the HDM.	Chapter 4.0, Project Description
• Provide a letter from the Floodplain Administrator stating that this project has no rise or a letter showing coordination with the Floodplain Administrator.	Section 5.9, Hydrology and Water Quality
• Per the draft IS/EA, Page 19, Figure 9 is insufficient:	Updated figures are provided in Chapter 4.0, Project Description

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
• a) Provide existing topographic information with labels (typically 0.1' contours in the desert areas). • b) Provide proposed topographic information with labels (typically 0.1' contours in the desert areas). • c) Both maps/exhibits must clearly show the drainage patterns along SR-78, which in the current figure is not visible at all.	
• Coordinate with Caltrans' Survey Branch to obtain Caltrans R/W and SR-78 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing SR-78.	Updated figures are provided in Chapter 4.0, Project Description
• Provide information on the maps/exhibits to show how the conceptual offsite drainage will cross the Ted Kipf Road along SR-78.	• Chapter 4.0, Project Description • Section 5.9, Hydrology and Water Quality
• Hydrology and Hydraulics Study may be required to determine the effect of the proposed project to the existing drainage system in the area.	• Section 5.9, Hydrology and Water Quality
• US Bicycle Route System (USBRS) designates SR-78 as part of the "Southern Tier Route" in this area. Cyclists are present and use this road for regional and cross-country trips.	• Section 5.14, Transportation • Traffic Study (App. M)
• As the Glamis Specific Plan develops and is implemented, consider how cyclists and off-highway vehicles may interact. Namely when off-highway vehicles take the shoulder of SR-78, where cyclists may be present.	• Section 5.14, Transportation • Traffic Study (App. M)
• The document mentions "Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures." Please specify the locations of sidewalks and bike lanes, and other complete streets elements.	• Chapter 4.0, Project Description • Section 5.14, Transportation • Traffic Study (App. M)

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
NATIVE AMERICAN HERITAGE COMMISSION (NAHC) – OCTOBER 21, 2020	
• Assembly Bill 52 (AB 52) applies to any project for which an NOP, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.	• Section 5.4, Cultural Resources • Section 5.15, Tribal Cultural Resources • AB-52 Consultation Letters and Responses (App. G-2)
• NAHC recommends that lead agencies consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project.	• Section 5.4, Cultural Resources • Section 5.15, Tribal Cultural Resources • AB-52 Consultation Letters and Responses (App. G-2) • SB-18 Consultation Letters and Responses (App. G-3)
• Both Senate Bill (SB 18) and AB 52 have tribal consultation requirements.	• Section 5.4, Cultural Resources • Section 5.15, Tribal Cultural Resources • AB-52 Consultation Letters and Responses (App. G-2) • SB-18 Consultation Letters and Responses (App. G-3)
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) –NOVEMBER 20, 2020	
• Include an assessment of various habitat types located within the Project footprint, and a map that identifies the location of each.	Section 5.4, Biological Resources
• Include a general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project.	Section 5.4, Biological Resources
• Conduct a complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species. Species to be addressed should include all those which meet the CEQA definition.	Section 5.4, Biological Resources
• CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be	Comment noted

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.	
• Conduct a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants).	• Section 5.4, Biological Resources • Biological Technical Report (App. F)
• Include information on the regional setting, with special emphasis on resources that are rare or unique to the region.	Section 5.4, Biological Resources
• Conduct a full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.	Section 5.4, Biological Resources
• The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources and include the following: – A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage; – Project related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and – Post-Project fate of runoff from the Project site.	• Section 5.4, Biological Resources • Section 5.9, Hydrology/ Water Quality

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
– A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).	Section 5.4, Biological Resources
– An evaluation of impacts to adjacent open space lands from construction, long-term operations and maintenance.	• Section 5.1, Aesthetics • Section 5.2, Air Quality • Section 5.4, Biological Resources • Section 5.10, Noise
– A cumulative effects analysis developed as described under CEQA Guidelines section 15130. Please include all potential direct and indirect project-related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis.	• Section 5.4. Biological Resources • Chapter 7, Cumulative Impacts
Alternatives Analysis • CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects • The alternatives analysis should also evaluate a "no project" alternative	Section 8.0, Alternatives
Mitigation Measures for Project Impacts to Biological Resources • DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. • The DEIR should assess all direct, indirect, and cumulative impacts that are expected to occur.	Section 5.4, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
Fully Protected Species: • Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. • DEIR should analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. • Lead Agency should include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.	Section 5.4, Biological Resources
Sensitive Plant Communities: • CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.	Section 5.4, Biological Resources
California Species of Special Concern (CSSC): • CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, include flat-tailed horned lizard, burrowing owl, Le Conte's thrasher, and Palm Springs pocket mouse.	Section 5.4, Biological Resources
Mitigation: • CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant and the DEIR should include mitigation measures for adverse Project-related impacts to local and regional ecosystems.	Section 5.4, Biological Resources

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
• Mitigation measures should emphasize avoidance and reduction of Project impacts.	Section 5.4, Biological Resources
• For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.	Section 5.4, Biological Resources
• The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.	Section 5.4, Biological Resources
• If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR.	Section 5.4, Biological Resources
• CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.	Section 5.4, Biological Resources
Habitat Revegetation/Restoration Plans: • Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used in their development.	Biological Technical Report (App. G-1)

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
• Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought. CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes.	Biological Technical Report (App. G-1)
Nesting Birds and Migratory Bird Treaty Act: • CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur.	Section 5.4, Biological Resources
• The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site.	Section 5.4, Biological Resources
• If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.	Section 5.4, Biological Resources
Moving out of Harm's Way: • To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground-and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities.	Comment noted
• Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise by injured or killed, and individuals should be moved only as far a necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas).	Comment noted
• Temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.	Comment noted

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
Translocation of Species: • CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.	Comment noted
California Endangered Species Act (CESA) • CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" of State-listed CESA species, either through construction or over the life of the Project.	Comment noted
• CDFW recommends that the DEIR address all Project impacts to listed species and include a mitigation monitoring and reporting program that will meet the requirements of CESA.	Section 5.4, Biological Resources
Lake and Streambed Alteration Program • Based on review of material submitted with the NOP and review of aerial photography at least two drainage features traverse the site. It is likely that the Project applicant will need to notify CDFW per Fish and Game Code Section 1602 prior to commencing any activity that may substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. • Early consultation with CDFW is recommended.	• Chapter 4.0, Project Description • Section 5.4, Biological Resources

2.7.3. Public Notice/Review of Draft EIR Review

The Draft EIR will be circulated to the California State Clearinghouse (SCH), responsible and trustee agencies, and interested parties for a 50-day public review period (45-day minimum per CEQA, plus five days per County of Imperial CEQA Guidelines). The Draft EIR will also be made available review online at the ICPDSD website: http://www.icpds.com.

Hard copies will also be available at the at the ICPDSD, 801 Main Street, El Centro, California 92243.

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

The public review and comment period ends on March 16, 2023. Comments received during the public review period of the Draft EIR will be reviewed and responded to in the Final EIR. The Final EIR will then be reviewed by the Imperial County Planning Commission (Commission) and Board of Supervisors (Board) as a part of the procedures to certify the EIR.

2.7.4. Certification of Final EIR/Project Consideration

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

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

2.7.5. Mitigation Monitoring And Reporting Program

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

2.8. Intended Uses of the EIR

An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could

feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project. The EIR is intended to provide documentation pursuant to CEQA to cover all local, regional, and state permits and approvals which may be needed or are desirable in order to implement the proposed Project.

2.9. EIR Content and Organization

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

TABLE 2-2. REQUIRED EIR CONTENTS

Requirement (CEQA Section)	Location in EIR
Table of Contents (Section 15122)	Table of Contents
Executive Summary (Section 15123)	Chapter 1
Project Description (Section 15124)	Chapter 4
Environmental Setting (Section 15125)	Chapter 5, (Sections 5.1 through 5.16)
Significant Environmental Effects of Proposed Project (Section 15126.2(a))	Chapter 1; Chapter 5
Unavoidable Significant Environmental Impacts (Section 15126.2(b))	Chapter 1; Chapter 6
Significant Irreversible Environmental Changes (Section 15126.2(c))	Chapter 1; Chapter 6
Growth Inducing Impacts (Section 15126.2(d))	Chapter 1; Chapter 6
Mitigation Measures (Section 15126(e) and Section 15126.4)	Chapter 1; Chapter 5
Cumulative Impacts (Section 15130)	Chapter 1; Chapter 7
Effects Found not to be Significant (Section 15128)	Chapter 1; Chapter 8
Alternatives to Project (Section 15126.6(f))	Chapter 9
Organizations and Persons Contacted/List of Preparers (Section 15129)	Chapter 10

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

This EIR has been organized in the following manner:

- **Chapter 1.0, Executive Summary** is provided at the beginning of the EIR that outlines the conclusions of the environmental analysis and a summary of the proposed Project as compared to the alternatives analyzed in this EIR. The Executive Summary also includes a table summarizing all identified environmental impacts, along with the associated mitigation measures proposed to reduce or avoid each impact.
- **Chapter 2.0, Introduction,** provides an overview of the EIR, introducing the proposed Project, applicable environmental review procedures, and format of the EIR.
- **Chapter 3.0, Project Background,** provides complete description of the proposed Project's background.
- **Chapter 4.0, Project Description,** provides a description of the proposed Project, including its objectives, location (regional and local), general environmental setting, identification of discretionary actions and interested parties, and a list of cumulative projects. The setting discussion also addresses the relevant planning documents and existing land use designations of the Project site.
- **Chapter 5.0, Environmental Analysis,** provides a detailed impact analysis for each environmental issue, cumulative impacts and required mitigation measures, as applicable, that would result with project implementation.
- **Chapter 6.0, Analysis of Long-Term Effects,** addresses significant unavoidable impacts of the proposed Project, including those that can be mitigated but not reduced to below a level of significance; significant irreversible environmental changes that would result from the proposed Project, including the use of nonrenewable resources; and growth inducement.
- **Chapter 7.0, Cumulative Effects,** addresses the potential cumulative impacts associated with the proposed Project and other existing, approved, and proposed development in the area.
- **Chapter 8.0, Environmental Effects Found Not to Be Significant,** provides, for each environmental parameter analyzed, a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the proposed Project; the existing environmental setting; the potential adverse and beneficial effects of the proposed Project; the level of impact significance before mitigation; the mitigation measures for the proposed Project; and, the level of significance of the adverse impacts of the proposed Project after mitigation is incorporated.
- **Chapter 9.0, Alternatives,** provides a description and evaluation of alternatives to the proposed Project. This section addresses the mandatory "No Project" alternative, as well as

development alternatives that would reduce or avoid the proposed Project's significant impacts.

- **Chapter 10.0, Preparers,** identifies persons involved in the preparation of this EIR and/or those contacted during preparation of this EIR who provided information or data incorporated into the document.

- **Chapter 11.0, References,** provides a list of informational sources and technical reports utilized in preparation of the EIR.

- **Appendices** provide information and/or relevant technical studies in support of the environmental analysis contained in this EIR.

Environmental issues evaluated in Chapter 5.0 of this EIR include:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Approach To Analysis

CEQA Guidelines §15125(a) addresses how a lead agency should establish the baseline conditions against which potential environmental impacts of a project are measured, as follows:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or, if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

For the Glamis Specific Plan, this EIR describes physical environmental conditions, from both a local and regional perspective, as they existed at the time the Notice Of Preparation was published.

Each environmental issue area in **Chapter 5.0**, *Environmental Analysis,* contains a description of the following:

- The physical environmental setting as it existed at the time the Notice of Preparation was published along with the existing land uses on the site. The environmental setting constitutes the baseline physical conditions against which the County determines whether an impact is considered significant and adverse;
- The regulatory framework governing each issue;
- The threshold(s) of significance determined to be appropriate by the County pursuant to Section 15064.7 of the CEQA Guidelines;
- The methodology used in identifying and considering the issues;
- An evaluation of the project-specific impacts and identification of mitigation measures for each environmental parameter for which the proposed Project may result in potentially significant adverse impacts;
- A determination of the level of significance after mitigation measures are implemented. If significant unavoidable adverse impacts are identified (i.e., significant adverse impacts which cannot be mitigated or that remain significant even after mitigation is incorporated), it will be necessary for the County of Imperial to determine if the benefits from implementing the proposed Project outweigh the unavoidable adverse effects and adopt a Statement of Overriding Considerations.; and,
- The identification of any residual significant impacts following mitigation.

Environmental issues discussed in **Chapter 8.0**, *Environmental Effects Found Not to Be Significant*, include:

- Agriculture and Forestry Resources
- Mineral Resources
- Recreation
- Wildfires

2.10. Incorporation By Reference

This EIR relies upon previously adopted regional and statewide plans and programs, agency standards, and background studies in its analysis, such as the County of Imperial General Plan, Title 9 Land Use Ordinance; Noise Abatement and Control Ordinance, and Imperial County Air Pollution Control District ’s (ICAPCD CEQA Air Quality Handbook). Whenever existing environmental documentation or previously prepared documents and studies are used in the preparation of the EIR, the information is summarized for the convenience of the reader and incorporated by reference. In addition, each section which relies upon previously adopted plans, programs, environmental documentation and background studies notes how it specifically relates to the proposed Project and that the information has been reconfirmed. In accordance with the CEQA

Guidelines, Section 15150(b), the documents referenced in the EIR will be made available to the public for inspection at the County upon request. In addition, referenced documents and other sources used in preparation of the EIR are identified in Chapter 11.0 (References).

Technical studies and reports prepared for the proposed Project are included in the Appendices of and are considered part of the EIR.

3.0 PROJECT BACKGROUND

3.1 Project Location

The Glamis Specific Plan Area (GSPA) is located in the unincorporated community of Glamis, a remote area in the eastern portion of Imperial County. Glamis is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea. See **Figure 3--1**, *Regional Location* and **Figure 3-2**, *Project Vicinity*).

3.2 Project Background

3.2.1 History of the Glamis Specific Plan Area

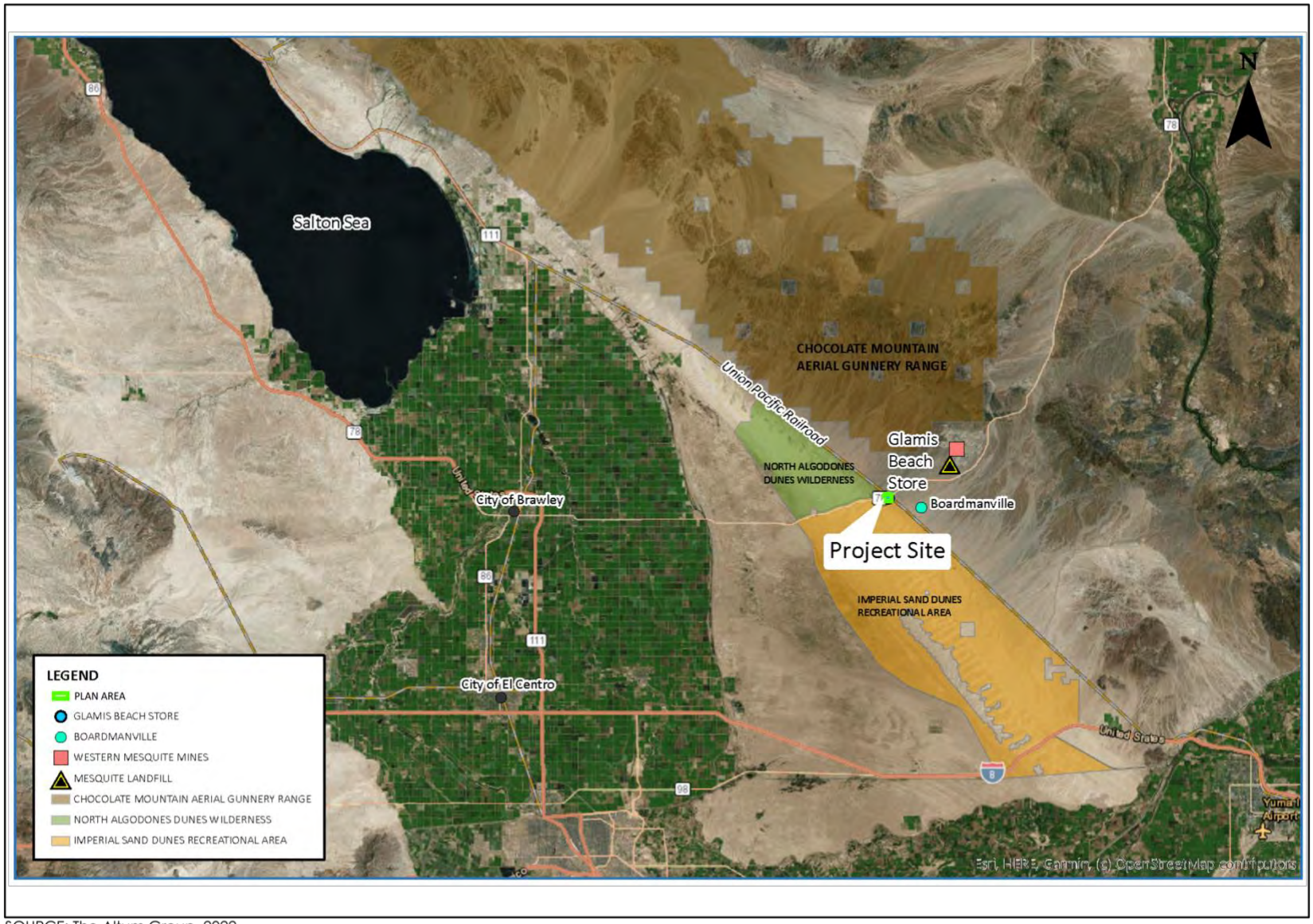
Glamis and the Imperial Sand Dunes Recreation Area (ISDRA) have been utilized for off-highway vehicle (OHV) recreational activities since the 1960s. Enthusiasm for dune buggies and other sand vehicles brought 30,000 people to Glamis during the 1979 Thanksgiving weekend. By the 2010s, tens of thousands of OHV enthusiasts were visiting the ISDRA during the holidays in autumn, winter and early spring months, many of them camping in Recreational Vehicles (RVs) near Glamis. Glamis became known as the Sand Toy Capital of the World. As a result, events and activities such as "Camp RZR" started to occur within Glamis that attracted as many as 20,000 visitors from the ISDRA annually.

3.3 Current Activities at the Glamis Specific Plan Area

3.3.1 Existing Characteristics

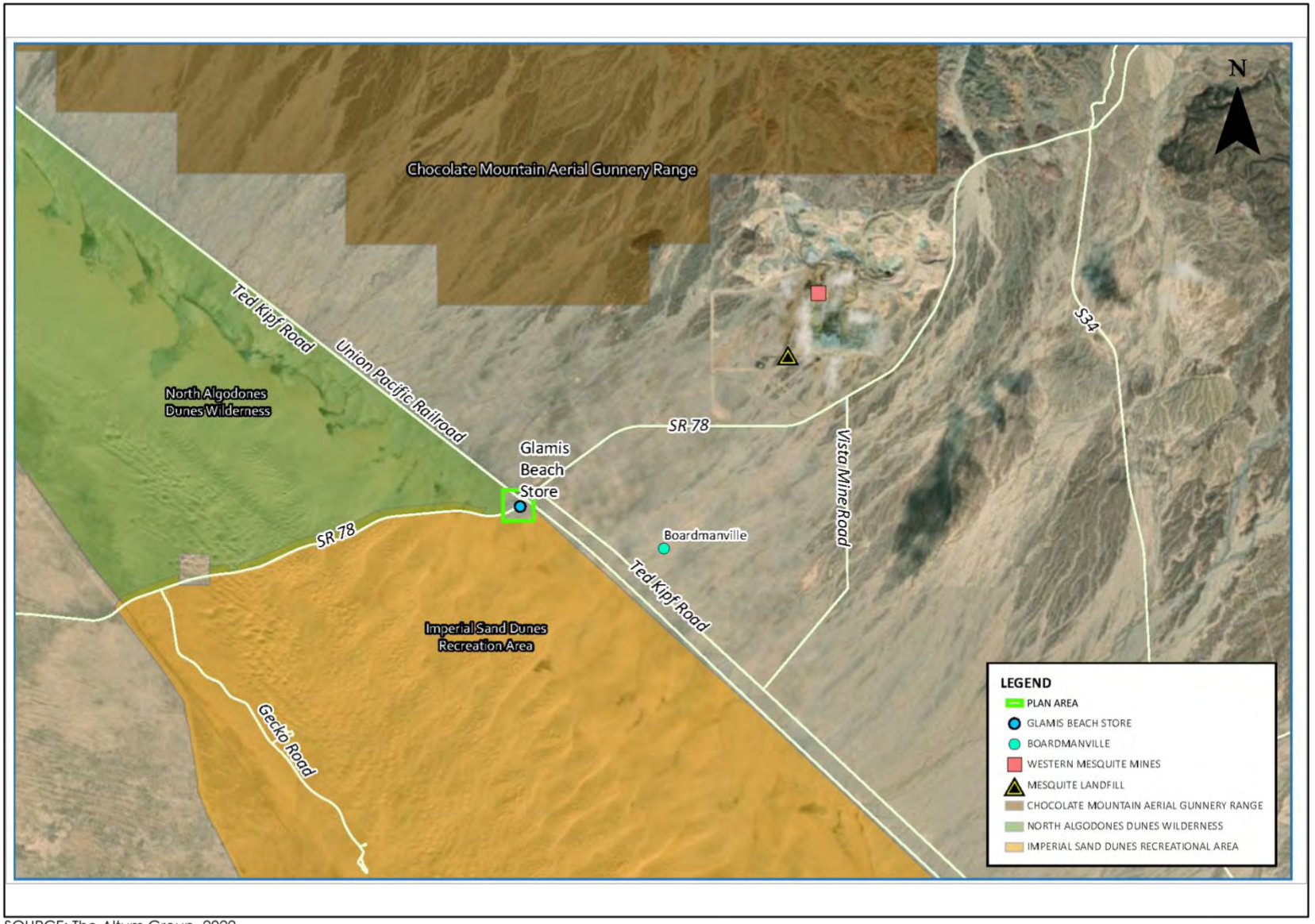
The GSPA is located on private land that is directly adjacent to the ISDRA in an unincorporated area of Imperial County. It contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store (**Figure 3-3**, *Project Site*). The Planning Area encompasses 143 acres and is composed of seven (7) parcels of land identified as assessor parcel numbers (APN) 039-310-017; -022; -023; -026; -027; -029; and -030. The Planning Area is regionally accessible via State Route 78 (SR-78) (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road, serves as a secondary access extending northwesterly for approximately 17 miles from SR-78 to Niland-Glamis Road. The eastern half of the Planning Area is also traversed by the Union Pacific Railroad (UPRR) which runs north and south and by Wash Road which parallels the UPRR south of SR-78.

The Planning Area can be characterized as an area of open desert with several adjoined one- and two-story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store.



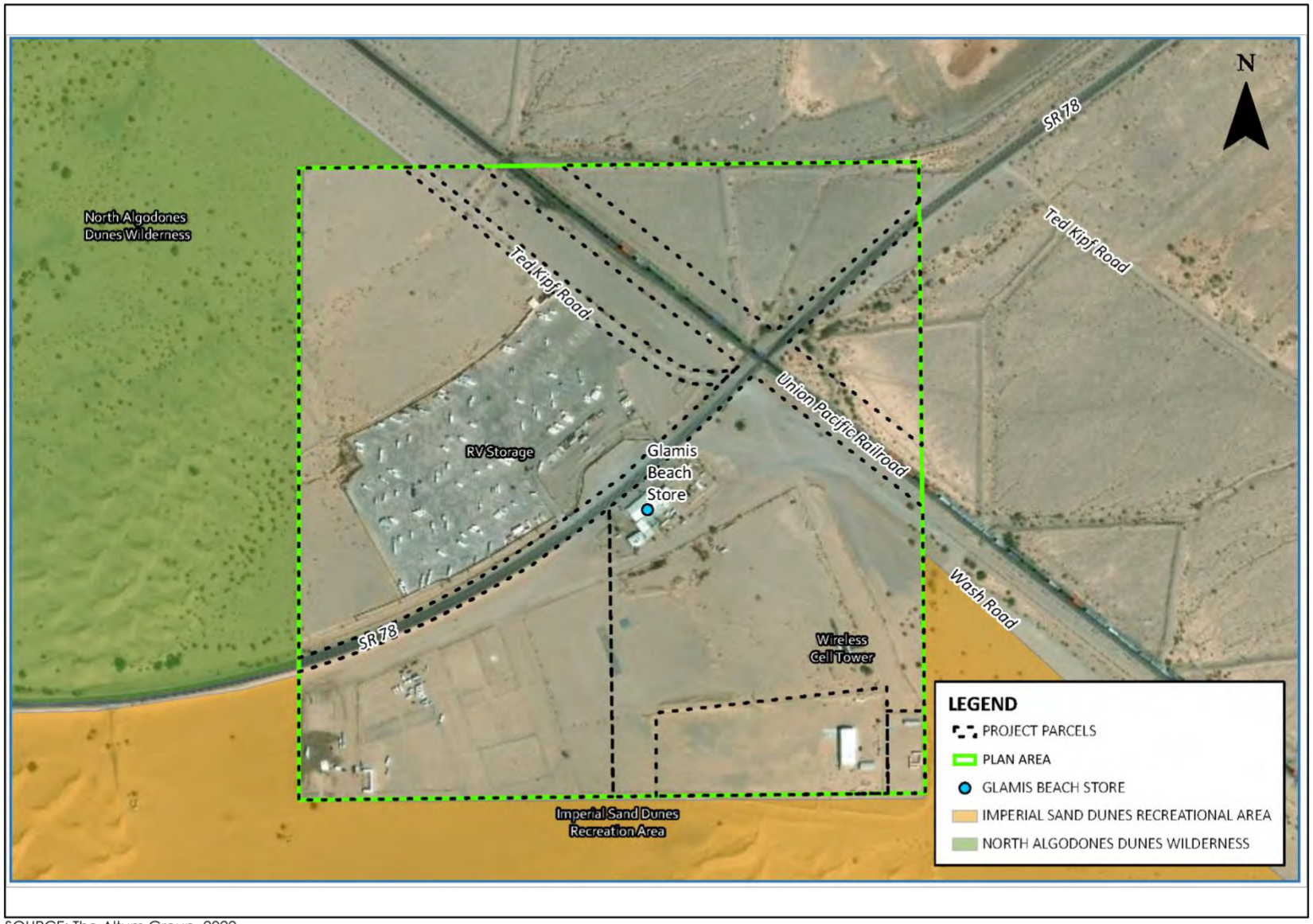
SOURCE: The Altum Group, 2022.

Regional Setting
Glamis Specific Plan
Figure 3-1



SOURCE: The Altum Group, 2022.

Project Vicinity
Glamis Specific Plan
Figure 3-2



SOURCE: The Altum Group, 2022.

Glamis Specific Plan Area
Glamis Specific Plan
Figure 3-3

Additionally, there is a separate seasonal OHV repair business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower, approximately 180 feet in height, is located at the southeast portion of the project vicinity. Due south is a single-family residence, large RV storage garage, and other related equipment storage buildings. Additionally, a prefabricated residential structure is located on the southeast corner of the project vicinity. To the west, across SR-78 and opposite the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Last, on the northeast side of the project vicinity, crossing the UPRR, there are two triangular parcels that are currently vacant.

The topography for the project vicinity can be characterized as relatively flat. The only minor changes in topography are found along the northeast portion of the property (northeast side of the UPRR), which can be attributed to existing elevated flood control earthen dikes and a slight, gradual southwest to northeast trending slope contour. Overall, elevation contours of the project vicinity range from 325 feet above mean sea level (AMSL) at the southwest corner of the Planning Area to 344 feet AMSL at the northeast corner. Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the Planning Area.

As discussed above, the project vicinity and the ISDRA have been a popular OHV recreational destination since the 1960s. By the 2010s, Glamis and the ISDRA were experiencing exponential growth from RV and OHV enthusiasts. As a result, events and activities such as "Camp RZR" started to occur within the project vicinity that attracted as many as 20,000 ISDRA visitors during Halloween weekend or the weekend before Halloween. With the advent of special events within the Glamis area discretionary temporary event permits and conditional use permits (CUPs) required by the County of Imperial were deemed necessary to allow for the continued provision of such events. Currently, special and temporary events are permitted under CUP #08-0025. Events such as "Camp RZR" are required to undergo review and approval of event operations and protocols with the County and key stakeholder agencies.

Currently, special and temporary events are permitted under CUP #08-0025. Events such as "Camp RZR" are required to undergo review and approval of event operations and protocols with the County and key stakeholder agencies.

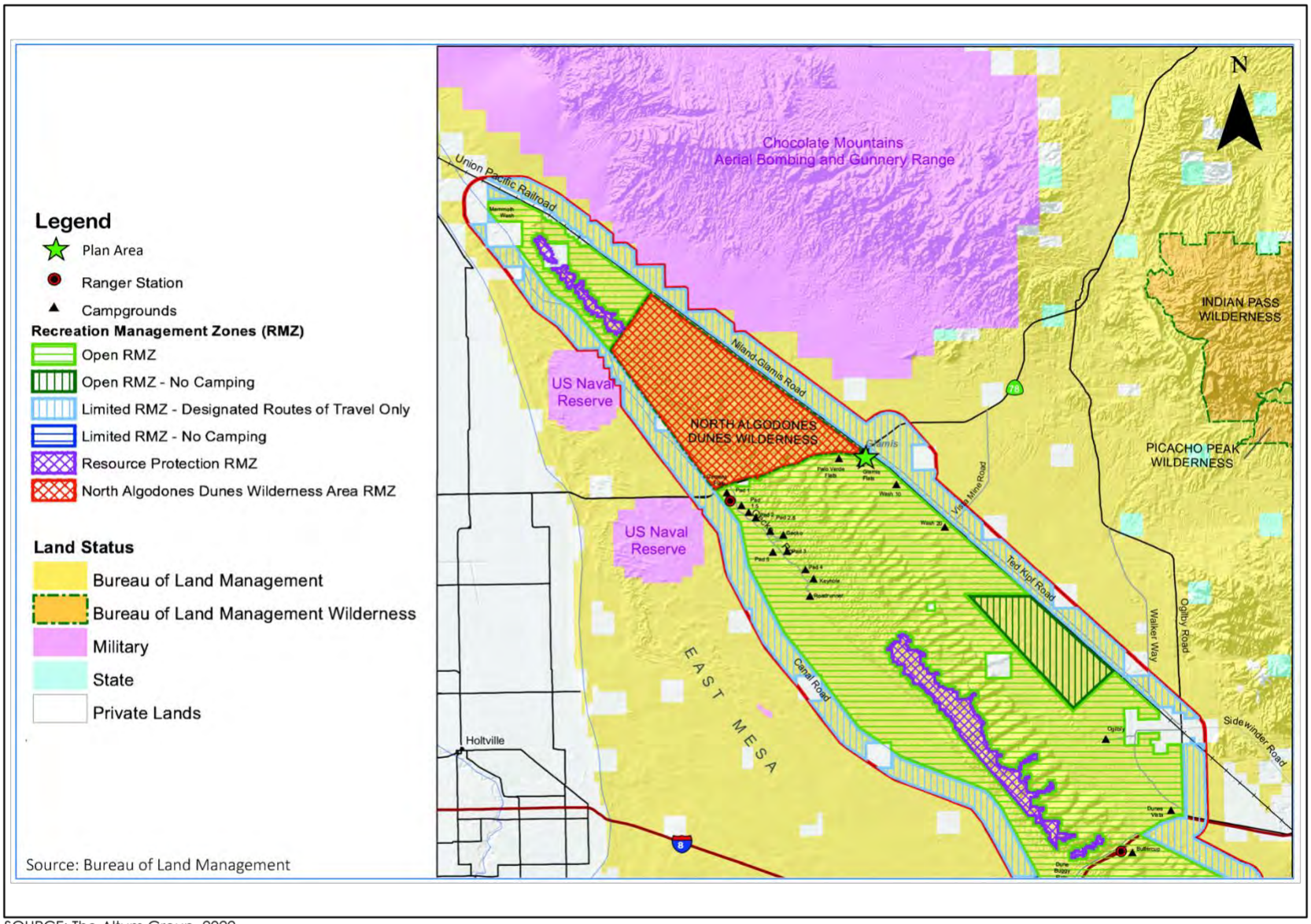
3.3.2 Surrounding Land Uses

The Planning Area is surrounded by open desert land that is managed almost entirely by the Bureau of Land Management (BLM). Directly northwest of the planning area, is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use, however, camping is allowed. The project vicinity is directly adjacent to the ISDRA

to the southwest, south and southeast. The ISDRA is the largest mass of sand dunes in the State of California. North of the NADW is the Chocolate Mountain Aerial Gunnery Range (CMAGR) which is a live-fire training range used for developing and training Marine Corps and Navy aviators. The area to the northeast of the Planning Area is BLM land but is not part of the ISDRA (**Figure 3-4**, *Surrounding Land Uses*).

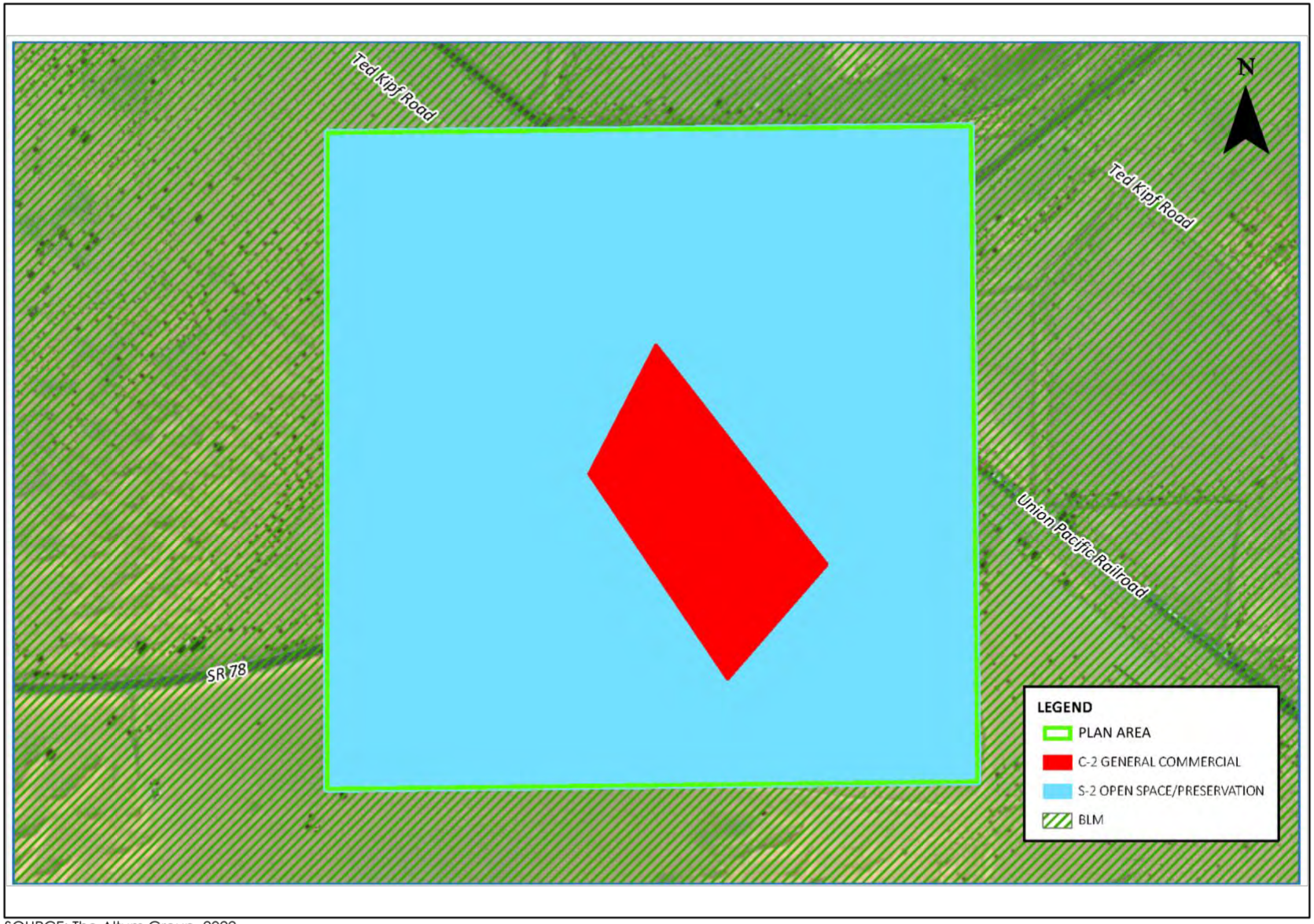
3.3.3 General Plan and Zoning Designation

The project vicinity is designated on the adopted Land Use Element of the County of Imperial's General Plan as the GSPA (County of Imperial, 2015). As noted in the County's Land Use Element, approval of a Specific Plan by the Imperial County Board of Supervisors (Board) is required prior to any significant new use or development in this area, except agricultural use. The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. The general area of the Glamis Beach Store is currently zoned as C-2 (Medium Commercial), while the remainder of the GSPA is zoned as S-2 (**Figure 3-5**, *Existing Zoning*).



SOURCE: The Altum Group, 2022.

Surrounding Land Use
Glamis Specific Plan
Figure 3-4



SOURCE: The Altum Group, 2022.

Existing Zoning
Glamis Specific Plan
Figure 3-5

4.0 PROJECT DESCRIPTION

4.1 Introduction and Overview

Polaris Inc. (the Applicant) is proposing a Specific Plan (Appendix M) for the development of the Glamis Specific Plan Area (GSPA). The proposed Specific Plan would implement the County's objectives for the development of this area which are to:

- Accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities;
- Coordinate specific plan with the Bureau of Land Management (BLM) and affected local agencies; and;
- Provide public services to the GSPA concurrent with the need.

4.1.1 Specific Plan Process

A specific plan is a regulatory tool for the thoughtful and systematic implementation of a General Plan for a defined area. The proposed Specific Plan is intended to meet the Specific Plan requirements as set forth in California State Law (California Government Code [CGC] Section [§] 65450) through which the State authorizes cities and counties to adopt Specific Plans as appropriate tools in implementing their General Plans. Under the provision of this Statute the County has the authority to include detailed regulations, conditions, programs and all proposed legislation within the Specific Plan that are necessary for the systematic implementation of the General Plan.

During the preparation of the proposed Specific Plan, stakeholder meetings were held (in June through August 2019) with California Department of Transportation (Caltrans) District 11, the Imperial County Transportation Commission (ICTC), the County of Imperial Department of Public Works (DPW), the BLM – El Centro Field Office, and other local governmental agencies, to get input into the overall development and implementation of the proposed Specific Plan. Stakeholder meetings were also held to make sure the proposed circulation plan for the GSPA would be consistent with each agency's requirements and general direction, and to ensure that the proposed Specific Plan would be properly integrated into the County's Regional Transportation System.

4.1.2 Regulatory Context

4.1.2.1 Land Use Designations

The GSPA is designated on the adopted Land Use Element of the County of Imperial's General Plan (County of Imperial, 2015). As noted in the Land Use Element, approval of a specific plan by the Imperial County Board of Supervisors (Board), is required prior to any significant new use or development in this area, except agricultural use.

4.1.2.2 Zoning Regulations

The County's Zoning Ordinance (Title 9, Division 5 of the County's Land Use Ordinance) establishes regulations to protect the public health, safety and welfare, to provide for orderly development, classify, regulate and where applicable segregate land uses and building uses; to regulate the height and size of buildings; to regulate the area of yards and other open spaces around buildings; to regulate the density of population, and to provide the economic and social advantages resulting from orderly planned land uses and resources (Imperial County Zoning Ordinance).

The general area of the Glamis Beach Store is currently zoned as C-2 (Medium Commercial), while the remainder of the project vicinity is zoned as S-2 (Figure 3-5).

4.1.3 Description of Proposed Project

The proposed Specific Plan creates a distinctive masterplan for recreation-serving land uses which are consistent with the historical use of the GSPA. It provides for a great deal of flexibility as to the development of potential land uses within the GSPA to promote the concept of an open desert playground that derives from the "Camp RZR" event, historically held in October of each year at the GSPA, and the surrounding ISDRA. This area attracts hundreds of thousands of OHV enthusiasts every Halloween, Thanksgiving, Christmas, New Years, and President's Day weekend.

4.1.3.1 Planning Areas

The GSPA consists of eight (8) Planning Areas. Planning Areas 1, 2, 3, and 4 would be zoned as Commercial-Recreation 3 (CR-3) (Figure 4-1, *Proposed Zoning and Planning Areas*). This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events.

Planning Areas 5 and 6 would be zoned Commercial-Recreation 1 (CR-1). This zone is intended to allow small scale, low density development that will not enhance or contribute to the use of off-road vehicles on public highways or roads. This could include employee housing, research and development (R & D) facilities, Recreational Vehicle (RV park with restrictions)[1] and other similar uses.

Planning Area 7 is designated Commercial-Recreation 2 (CR-2). This designation is intended to accommodate recreational related commercial opportunities and projects that will support the Off Highway Vehicle (OHV) and recreational uses of the area at a higher density and allowable uses than CR-1 but still be limited to specific uses that are less intense and more occasional than those allowed in CR-3. This could include small repair shops, limited housing, RV park with restrictions and the like.

[1] Within this zone the Specific Plan will restrict the use of off-road vehicles accessing the highway.

SOURCE: The Altum Group, 2022.

N

0 400 800 Feet

Proposed Zoning Designations and Planning Areas
Glamis Specific Plan
Figure 4-1

Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation. S-1 is used to recognize areas that embody the unique Open Space and Recreational character of Imperial County including the deserts, mountains and water-front areas. The S-1 designation is primarily characterized by low intensity human utilization and small-scale recreation related uses.

As envisioned, the proposed Specific Plan will facilitate an entertainment enclave among the iconic dunes. This enclave will enhance the historic experiences that OHV riders and visitors expect when they visit the dunes.

The following is a brief description of the proposed land uses within the GSPA (Figure 4-2).

Recreational - The GSPA provides an opportunity for a variety of recreational activities to complement the established "Glamis" sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as OHV training, OHV rentals, etc.), amusement facilities, desert tours (off road experience), racetrack, shooting range, park/playground/picnic area, and other recreational-based activities.

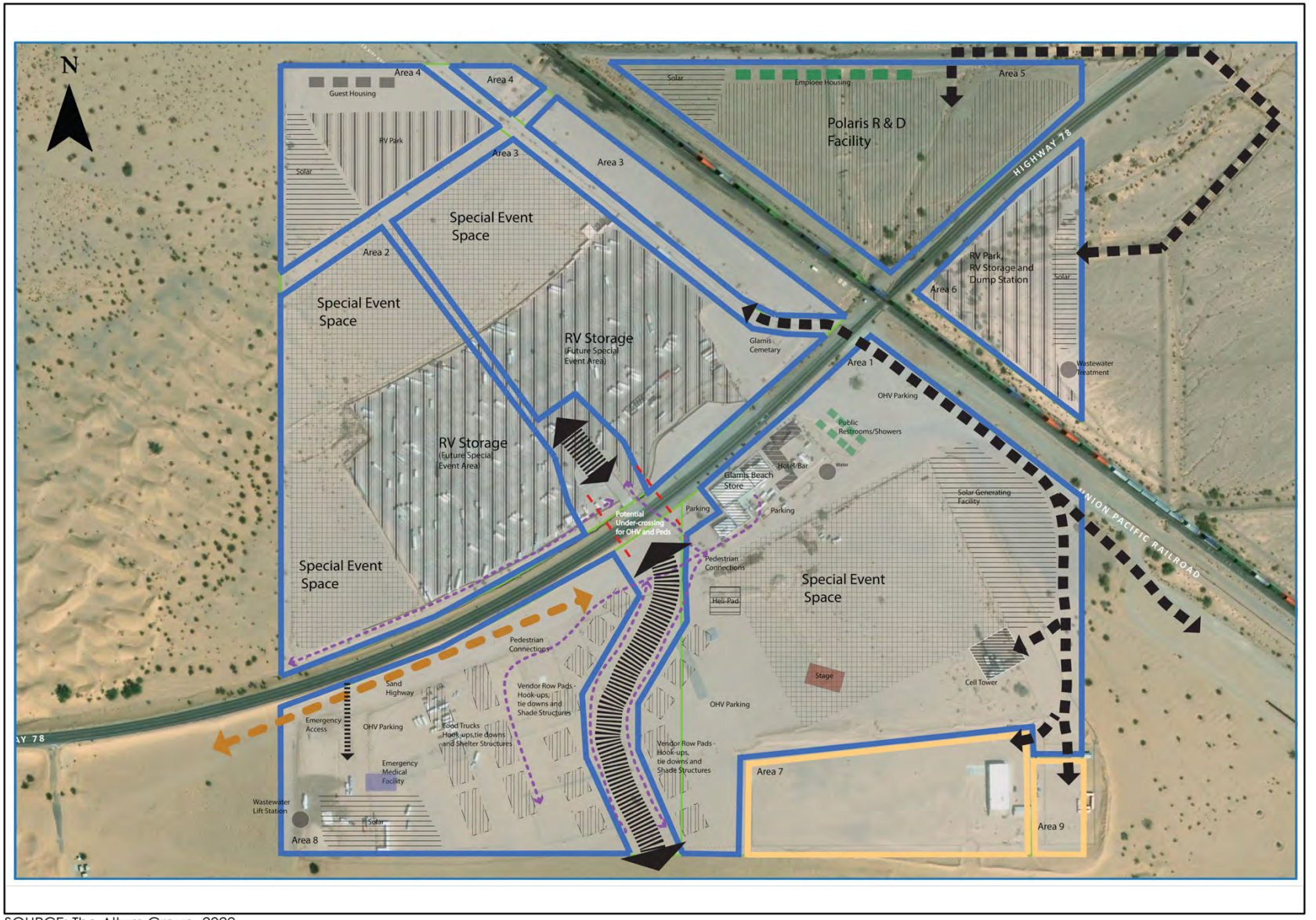
Commercial/Retail - The GSPA will allow for a wide range of commercial and retail development, which include fuel stations, rental facilities, and sporting goods stores to accommodate the needs of visitors to the Glamis area. It may also provide for RV Park(s) to accommodate a small number of users that desire to have conveniences not found in open dry camping.

Storage - OHV and RV storage is an existing land use within the project vicinity. The GSPA will provide for storage for OHVs and RVs to allow visitors to store their vehicles at Glamis year around.

Entertainment - The Glamis area has long been known as the premier destination for OHV enthusiasts to enjoy their recreational activities within the world-renowned ISDRA. The GSPA will allow for a range of entertainment land uses whose purpose is to enhance the visitors experience to the Glamis area. Entertainment land uses could include an obstacle course, fireworks display area, and racetrack.

Hospitality - With an average annual attendance of 200,000 visitors to the Glamis area, the GSPA will provide for the development of various hospitality services to provide visitors with the accommodations they need to fully enjoy all that the Glamis area has to offer. Hospitality land uses may include medical services facility, mobile food trucks, tourist information center, public showers, public restrooms, and hotel/motel facilities.

Residential - The GSPA will allow for limited residential development to accommodate those who require temporary housing in Glamis. Housing will be developed in the form of guest, employee housing, seasonal private residences and temporary use of RVs.



SOURCE: The Altum Group, 2022.

Conceptual Site Plan
Glamis Specific Plan
Figure 4-2

Renewable Energy - Due to the remote location of the project vicinity, renewable energy facilities will be developed to provide electricity to the project vicinity. The GSPA will allow for the development of a solar generation facilities (including battery storage) located throughout the project vicinity (Figure 4-2).

Infrastructure Improvements - In order to properly accommodate the large volume of visitors to the project vicinity, existing water and wastewater facilities will need to be improved along with the development of additional infrastructure. The GSPA will allow for the development of utility buildings, utility substation(s), and water/wastewater treatment facilities.

Research & Development Facility - The GSPA provides for a R&D facility that will take advantage of the close proximity of the ISDRA. This R&D facility will allow Polaris to test their equipment in a natural and private setting.

4.1.4 Project Objectives

The location and historical recreational use of the GSPA is key to planning the GSPA. The Specific Plan Area designation in the County's General Plan establishes the intended general land use character. However, the Glamis community is unique in that it has served, and will continue to serve, as the premiere locale for hundreds of thousands of OHV riders and recreational visitors from around the world. The GSPA's location within the County, together with SR-78 bisecting the project site, the proximity to Interstate 8 to the south and the State of Arizona to the east, makes it a desirable location for recreational visitors to travel efficiently east or west. The GSPA attempts to build off the historical Glamis experience by providing expanded recreational, commercial, entertainment, and hospitality experiences while addressing environmental, engineering, commercial, public safety, and aesthetic needs that have been identified during the planning process. Finally, the GSPA will eliminate the need for special event-related annual CUPs and/or discretionary temporary event permits through implementation of a Special Events Management Plan (SEMP) notification that will include standards and protocols in accordance with the regulatory requirements of the County and key stakeholder agencies for regulation of special events.

The objectives for the GSP are the following:

1) Create a man-made environment that is compatible with the natural environment, surrounding land uses, and the desert climate.
2) Ensure that development within the GSPA is consistent with the County's General Plan and will protect public health, safety and general welfare, while complementing surrounding land uses and zoning.
3) Provide design criteria that will guide developer(s) and the County in the development of proposed land uses by including descriptive text and illustrative exhibits setting forth the foundation of the overall development of the project site.

4) Enable Special Events through implementation of a SEMP.
5) Adhere to the Zoning Ordinance for the GSPA in Section 3, Zoning Ordinance.
6) Provide recreational and ancillary facilities that serve the needs of the Glamis community and recreational visitors.

4.2 Specific Plan Components

The proposed Specific Plan is a regulatory document that addresses the GSPA included in the County's General Plan. The County's General Plan requires a Specific Plan to be developed for the GPSA, in accordance with the GSPA design criteria, objectives and policies as outlined in the County's General Plan Land Use Element. The proposed Specific Plan provides a planning framework which accommodates recreation-supporting land uses including retail and service commercial; hotel accommodations; recreational vehicles; RV parks and fuel stations and Special Events. The proposed Specific Plan has been prepared to minimize changes to the natural topography of the project site, and to reduce intrusions upon the existing landscape and to any scenic views. A full draft of the proposed Specific Plan is available online at http://www.icpds.com. In compliance with CEQA, only those components of the proposed Specific Plan that would have the potential to result in potential environmental effects are addressed in this EIR.

4.2.1 Development Standards

The proposed Specific Plan provides development standards for maintaining recreation-serving land uses which are consistent with the historical use of the Glamis area. These associated components define the overall master development concept for the Glamis planned mixed-use development and identifies the objectives, descriptions and applicable development standards for each. Development standards for the GSPA have been established at two levels: (1) standards that apply universally to the overall project which are discussed in Sections 4.3.3 through 4.3.8 below, and (2) those standards that apply specifically to the individual Planning Areas and further reinforce the overall project standards.

The only Planning Area that would apply the County's existing Zoning Designations would be Planning Area 8. Development standards of Planning Area 8 would be consistent with the standards contained within the S-1 Zoning Ordinance of the County's Municipal Code.

4.2.2 Design Guidelines

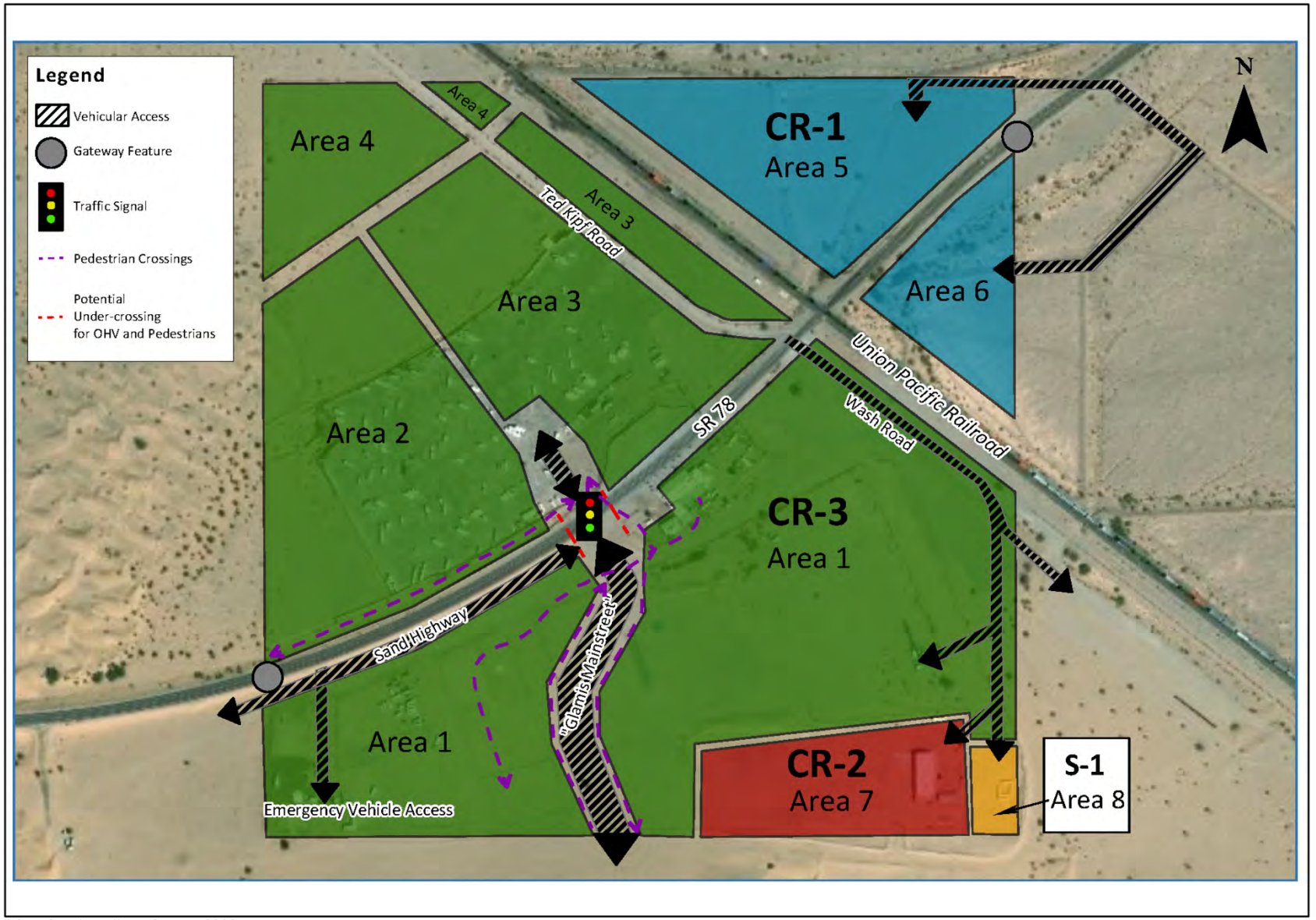
The GSPA includes design guidelines for the physical arrangement of land uses and open space/recreation areas. Adequate open space shall be provided within the developed areas to complement the open space character of the area. Each Planning Area will be seasonally occupied and be left as open space the majority of the year (Figure 4-2), and as allowed for within (particularly) CR-3.

4.2.3 Circulation Plan

The primary objective of the Circulation Plan for the GSPA is to meet the vehicular/OHV traffic needs of the recreational visitors by providing safe, direct and convenient access to the project vicinity and the ISDRA. There are a total of six (6) proximate vehicular access points to the project vicinity with a gateway feature on SR-78 at the east and west boundary of the project vicinity (Figure 4-3). Primary accessibility to the project vicinity will be via SR-78 which serves as the main transportation route for cars and trucks traveling between Brawley and Blythe. The primary access point will be an intersection of "Glamis Mainstreet" and SR-78. This intersection may, in the future as traffic counts warrant, be signalized and will provide access to the project vicinity north and south of SR-78.

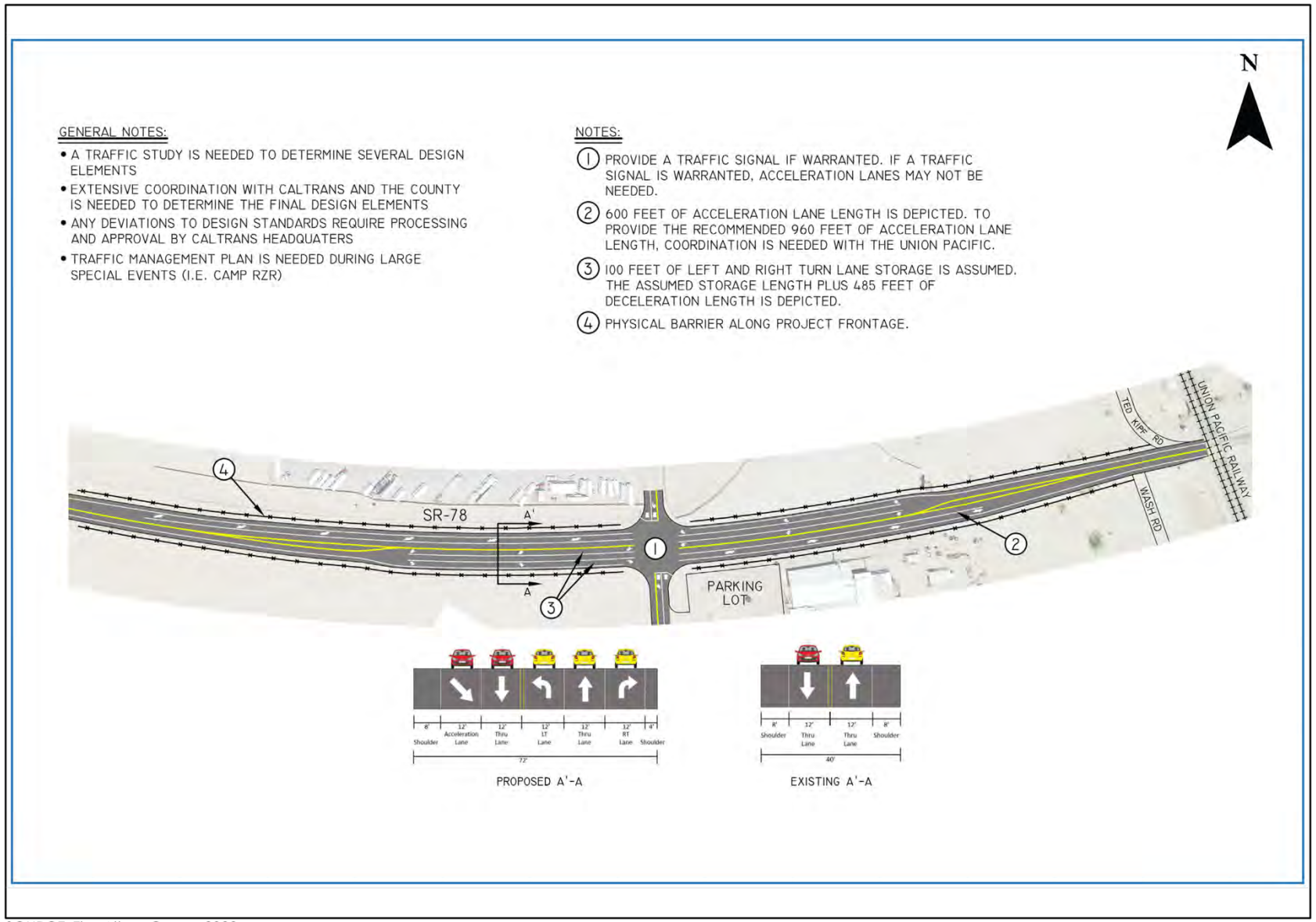
The "Glamis Mainstreet" will serve as the main thoroughfare for circulation across Planning Areas 1, 2, 3, and 4 and currently serves as the main OHV access route to the ISDRA directly to the south. To accommodate the anticipated vehicular traffic flow, the Applicant has proposed a conceptual intersection plan with proposed cross-sections subject to final design and approval from Caltrans (Figure 4-4). This concept shows the portion of SR-78 traversing through the Planning Area being expanded from two thru lanes with an ultimate right-of-way (ROW) width of 40 feet to a total of five (5) lanes with an ultimate ROW width of 72 feet. The segment of SR-78 west of the proposed intersection would have three easterly lanes – one thru lane, one left turn lane and one right turn lane – and two westerly lanes with one thru lane and an acceleration lane terminating approximately 1,000 feet from the intersection. The segment of SR-78 east of the intersection is of a similar configuration of the western segment with the number of lanes in each direction reversed and the acceleration lane terminating approximately 600 feet from the intersection. The proposed lane configuration would accommodate anticipated turning movements from all directions in a manner that would prevent collisions and provide safe circulatory direction. Extensive coordination with Caltrans and the County will be needed to determine the final design elements for SR-78 within the project vicinity.

Access will also be provided along Wash Road (an unimproved road parallel to the Union Pacific Railroad [UPRR]) from SR-78 from which Planning Areas 1, 7 and 8 will be accessible. Wash Road, which is maintained by the BLM, will continue to function as a primary access road providing access in a southeasterly direction (parallel and west of the UPRR) to ISDRA (and camping areas, etc.) located further southeast. Access to Planning Areas 5 and 6 will be provided east of the UPRR along SR-78 via dirt roads. Access to Planning Areas 5 and 6 will be restricted to passenger and service vehicles and RVs, this will prevent unsafe pedestrian and OHV crossing of the UPRR. Ted Kipf Road is a County-maintained dirt road which serves as access to ISDRA from the NADW and other BLM lands to the north of the project vicinity. Access will not be provided to Ted Kipf Road. Emergency vehicle access will be provided via the south side of SR-78 immediately due east of the western gateway feature for emergency access to Planning Area 1. The emergency access is



SOURCE: The Altum Group, 2022.

Conceptual Site Circulation Plan
Glamis Specific Plan
Figure 4-3



SOURCE: The Altum Group, 2022.

Conceptual Intersection Plan
Glamis Specific Plan
Figure 4-4

primarily intended for use during special events when there is the possibility of large numbers of visitors being on the project site. This access will have minimal improvements and will generally be controlled with a gate when not needed.

The proposed Specific Plan will address the historical uncontrolled OHV and pedestrian movement through implementation of circulatory project design features to promote safe circulation. The proposed Specific Plan will have strategically placed signage for speed limits throughout the project vicinity in order to prevent OHV/pedestrian/vehicular collisions as well as to assist with dust control measures. An OHV and pedestrian undercrossing is a proposed alternative in the vicinity of the SR-78/Glamis Mainstreet intersection (Figure 4-3). This undercrossing would allow OHVs and pedestrians to cross underneath SR-78, providing for easy and safe access from Planning Area 1 to Planning Areas 2, 3, and 4. The potential undercrossing is intended to eliminate OHVs from crossing SR-78. Furthermore, pedestrian connections throughout the project vicinity are proposed (Figure 4-3 and Figure 4-4). These pedestrian connections will provide for logical and safe movement throughout the project site.

The project vicinity includes the Sand Highway that runs parallel to SR-78 along the northwestern edge of Planning Area 1 (Figure 4-3). The Sand Highway is an existing OHV thoroughfare providing access to the Glamis Beach Store from the adjacent BLM land located to the west of the project site. As such, the Sand Highway will remain as an OHV thoroughfare. OHV circulation will occur primarily via the "Glamis Mainstreet" for access to the ISDRA to the south. While Pedestrian and OHV crossing of UPRR at various locations along the track has occurred for years, this plan attempts to discourage such crossing from the project vicinity and will require the posting of appropriate signage. Keeping the public from crossing the UPRR is beyond the ability of the project and with or without this project those crossings will continue.

Permanent signs and circulatory elements will be implemented as necessary to support the phased build-out of permanent structures within the GSPA. All future signs and circulation elements will be implemented in compliance with Federal, State, and local standards and be designed in concert with the designed connectivity of the Conceptual Circulation Plan. Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures. All such improvement will be subject to County and Caltrans review and approval, as applicable. As the GSPA is built-out with permanent and/or temporary structures per the proposed phasing plan, driven by market conditions, special design elements (i.e., signage) will be developed with Caltrans during final design. Furthermore, build-out of permanent uses within the GSPA will incorporate clearly marked areas designated only for OHVs and passenger vehicles to prevent collisions.

The GSP would consult the Caltrans Project Design Procedures Manual regarding the requirements and the Highway Design Manual for above ground Gateway Monuments. The Project Design Procedures Manual and the Highway Design Manual would also be consulted for the following:

- Design of any proposed grade separated structure and at-grade intersections.

- Proposed utility lines (new or relocated) within the right of way.
- Frontage roads along SR-78 including barrier separation.
- New access points along the right of way.
- Access openings on SR-78.

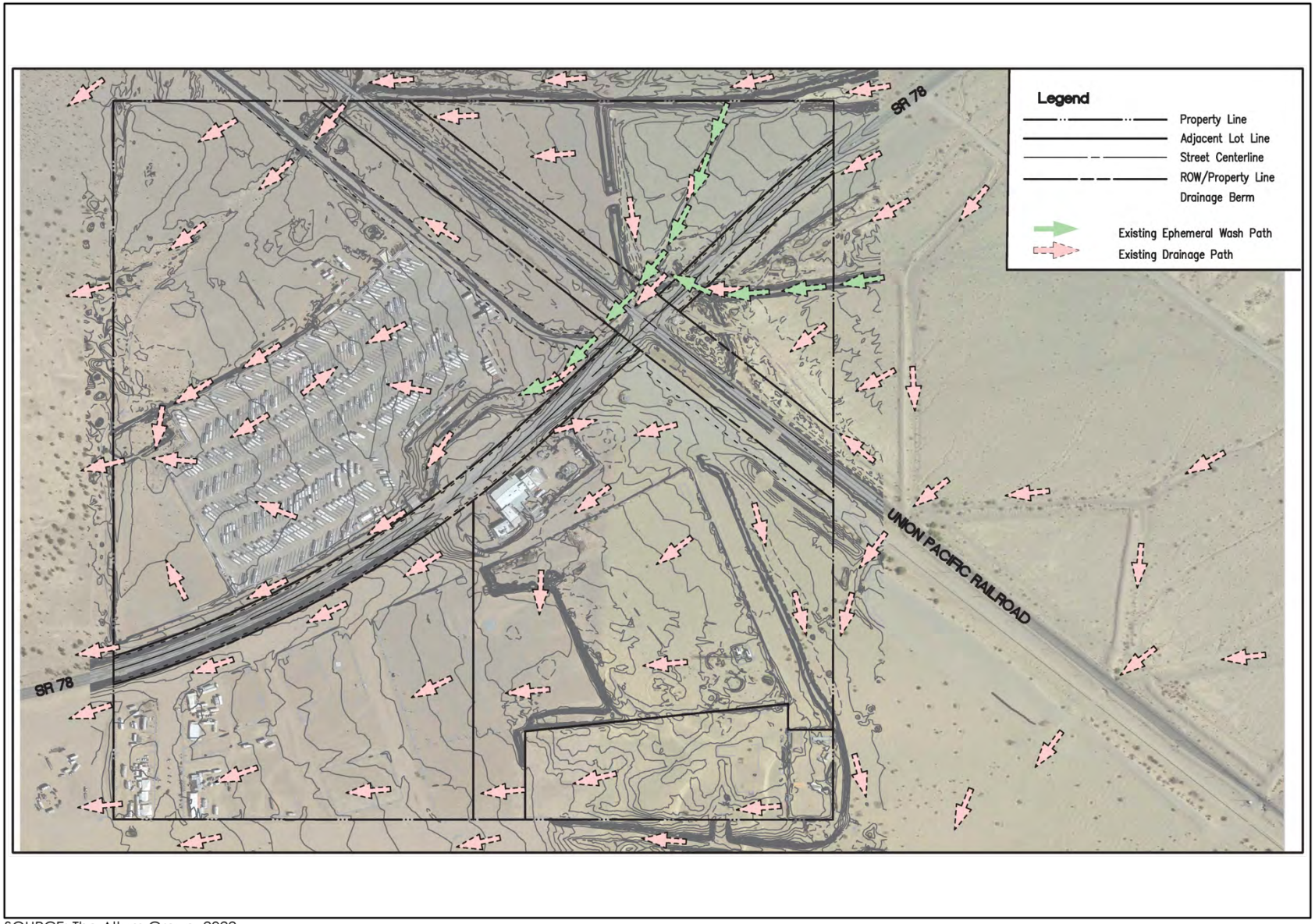
4.2.4 Special Events

Special events to be held within the GSPA, such as Camp RZR, that often include large assemblages of people and equipment, will benefit from the circulation improvements described herein, and will also be required to adhere to the traffic regulation standards set forth in the proposed Zoning Ordinance, including notification of Caltrans, the County, California Highway Patrol (CHP), Imperial County Sheriff, and other affected agencies, along with preparation of a Traffic Management Plan. In combination with the standards set forth in the proposed Zoning Ordinance, all special events will also be required to prepare a SEMP notification that subjects special events to standard protocols and conditions, including circulation-related protocols and conditions, to allow for special events to occur. The SEMP is further discussed below.

4.2.5 Drainage Plan

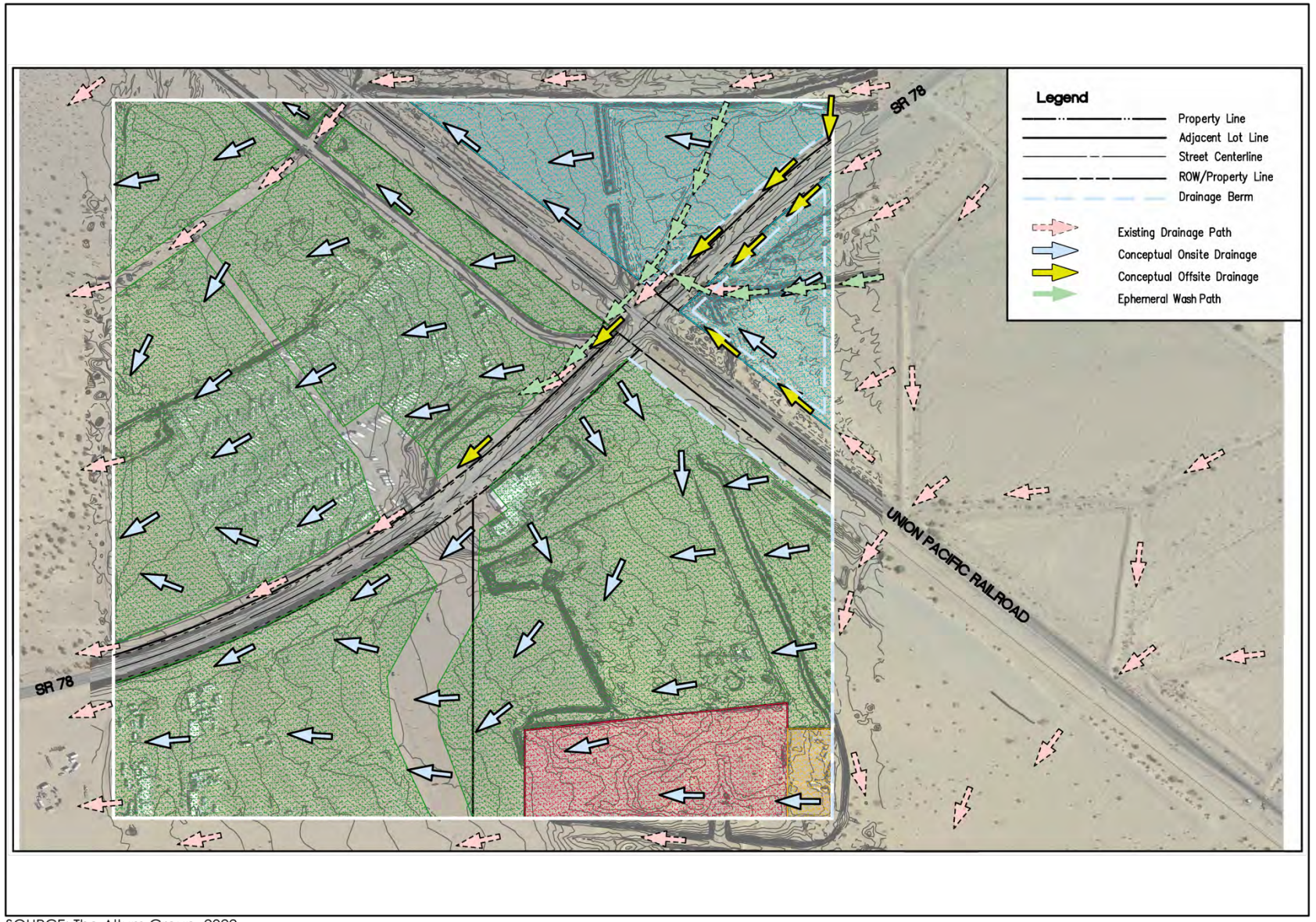
As shown in Figure 4-5, *Existing Drainage*, the existing topography and drainage of the GSPA generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the project vicinity (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR. The drainage flows from these three concrete culverts underneath the UPRR, flow through and/or around portions of the existing project vicinity (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All Planning Areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

The conceptual grading provides flood protection for future land uses within the entire project site and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with California drainage law (Figure 4-6). The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-direct the drainage around each of the Planning Areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for Planning Area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR 78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with



SOURCE: The Altum Group, 2022.

Existing Drainage
Glamis Specific Plan
Figure 4-5



SOURCE: The Altum Group, 2022.

Conceptual Drainage Plan
Glamis Specific Plan
Figure 4-6

the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the southwest under the UPRR, via existing concrete culverts.

4.2.6 Public Services and Utilities

4.2.6.1 Utilities

Water Supplies

Water supplies for existing uses within the GSPA are currently provided by an existing on site well (CUP #13-0059). This well is designed specifically for domestic water use to serve a residence and its ancillary buildings. This well was constructed to domestic water well standards and cannot be used as a potable water source for the larger project area. It is currently authorized to pump 1.5 acre-feet (AF) per year. There is one permitted public water system well (CUP #13-0060) that supplies water to the yet to be permitted Glamis Beach Store public water system, System No. 1300684. It also is currently authorized to pump 1.5 AF per year.

Groundwater is treated to potable water standards to service existing uses within the GSPA. A water treatment plant (reverse osmosis) has been constructed to meet the needs of the current and future uses but is as of yet unpermitted. The water treatment plant has a production capacity of 15 gallons per minute, which amounts to approximately 22 acre-feet per year although it is currently only producing two to five acre-feet per year which reflects current demand. The plant has room for expansion, and similar to the water and sewer distribution facilities (Figure 4-7, *Conceptual Water and Sewer Plan*), would be expanded to serve the various phases of development, as needed.

Wastewater Treatment Plan

Wastewater generated by the Glamis Beach Store, restaurant and bar is currently being discharged into an existing septic tank located near to those buildings. Future wastewater treatment needed (i.e., secondary and tertiary treatment) will be determined by the amount of wastewater forecasted to be generated by each phase of structural improvement. According to the Water Supply Assessment (WSA) (Appendix K) prepared for the project operational water use would be 3,011,440.5 gallons per year, Assuming an average water use of 82 gallons per person per day (USEPA, 2022) this equates to 36,724 people. Assuming a wastewater generation of 40 gallons per person per day this would result in a wastewater generation of 1,468,995 gallons of wastewater per day which would be generated predominantly in the winter season. The proposed Specific Plan will implement water efficient appliances (i.e., sinks, toilets, showers, wash-down areas, etc.) that will minimize potential water waste and conserve water to the maximum extent possible. As new development is implemented, this wastewater plant will be expanded as determined by the regulatory agencies (Figure 4-7).

Conceptual Water and Wastewater Treatment Plan Standards

- All water lines shall be placed underground in accordance with County requirements.
- All domestic water and sewer facilities shall be designed per County requirements. Facility sizing and location will be refined during final site plan development.
- Water and sewer facilities shall be designed and installed in accordance with the requirements and specifications of the County.
- Construction of domestic water and sewer facilities shall be timed to adequately serve the GSPA in each stage of development or as needed to ensure adequate service and public health.

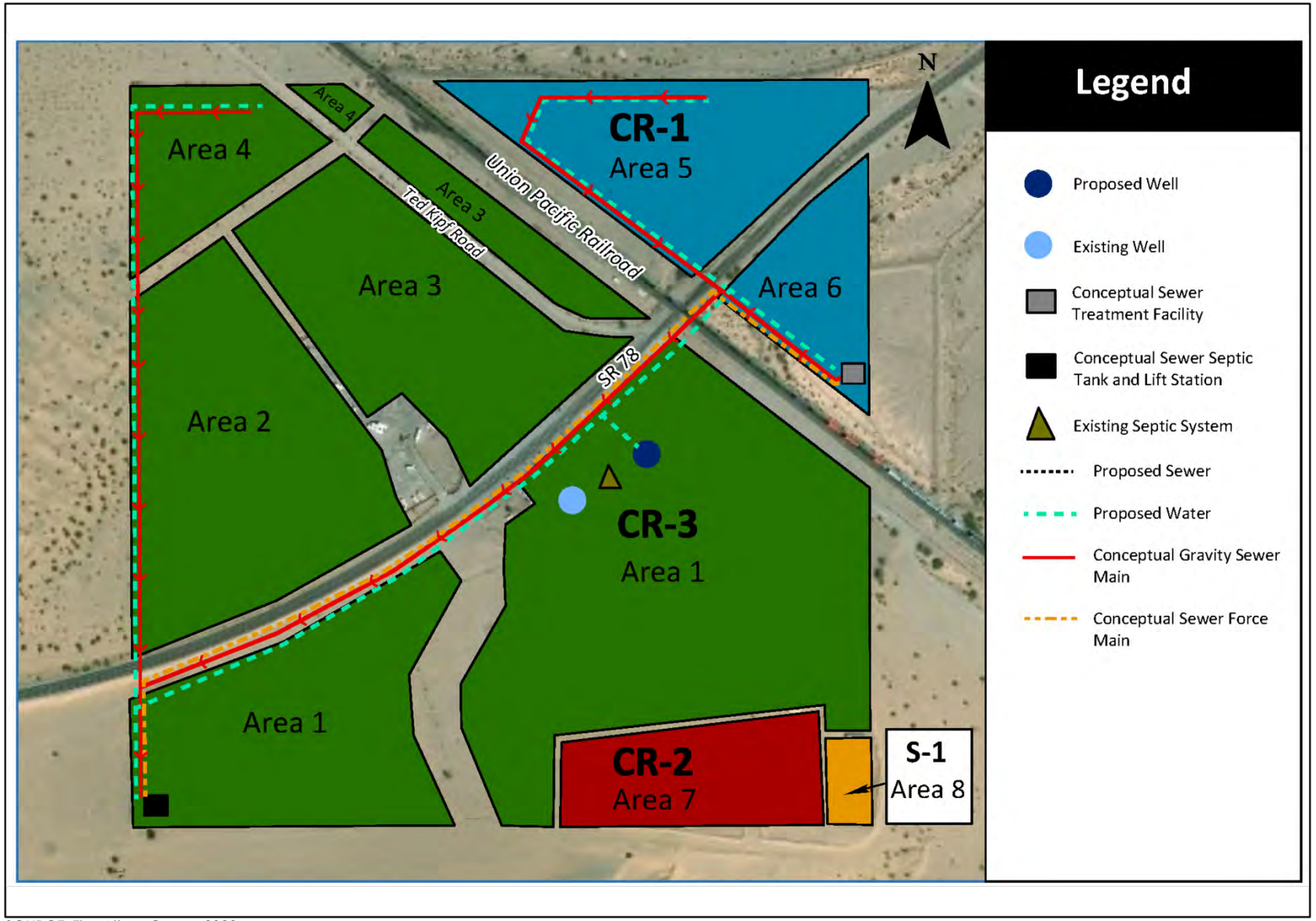
Electricity

The project vicinity currently rely on diesel generators for all of their electrical needs. Diesel generators may not be a feasible option if significant new development occurs in the future since air quality and greenhouse gas (GHG) emissions regulations are likely to become more restrictive over time. Two (2) options are being evaluated to determine which available source of power would best fit as the preferred option for the GSP. The first option would to be for Imperial Irrigation District (IID) to construct and install a power line from the nearest substation (approximately 7.2 miles to the northeast. A second option would be to develop a small commercial solar photovoltaic (PV) system, with a backup battery storage component or another green power system. The option applied will be determined/implemented with subsequent development plans.

4.2.6.2 Public Services

Fire Protection

Fire protection services are provided to the project vicinity through the Brawley Fire Department Station, located in the City of Brawley approximately 25 miles east of the project vicinity. There are existing Fire hydrant connections within the “Vendor Row” area. Additional connections will be implemented to meet the needs of the further build-out of the project vicinity. During Special Events, onsite fire protection will be provided with applicable fire protection services and apparatus.



SOURCE: The Altum Group, 2022.

Conceptual Water and Sewer Plan
Glamis Specific Plan
Figure 4-7

Law Enforcement

The County Sheriff's Department provides law enforcement to the project vicinity. Sheriff's officers that patrol the area are based at the Brawley Police Department located approximately 27 miles east of the project vicinity. During Special Events, on-site law enforcement will be provided with applicable services and apparatus.

Waste Removal

Municipal solid waste collection and disposal is provided by Republic Industries. There will be an appropriate number of dumpsters provided onsite for each Event. The number of dumpsters will be determined by the type of event, the time of day of the event, the projected number of attendees and the size of the designated area.

4.2.7 Open Space and Recreation Plan

The Conceptual Open Space and Recreation Plan is intended to complement the existing and future recreational use of adjacent BLM land. In accordance with the policies listed in the County of Imperial General Plan Land Use Element, the proposed Specific Plan provides for adequate open space within the development areas that will complement and maintain the existing open space character of the area. Proposed permanent structures will be sited appropriately to allow views from SR-78 to the open space beyond and will consider the adjacent natural resources. As shown in Figure 4-2, *Conceptual Site Plan,* there are open space areas that have been identified within Planning Areas 1, 2 and 3 to preserve the existing open space character of the area while allowing for adequate space for temporary special events and activities to be held, such as service stations and mobile food trucks located within Vendor Row.

Recreational amenities of the project vicinity will build upon the existing Glamis Beach Store through development of a restaurant and bar. Additionally, recreational amenities will consist of an Adventure Center that will offer both off-site and on-site recreational activities that are conducive to the Glamis area. Among the activities that may be included are:

- Off-site training;
- OHV rental;
- Hiking and biking;
- On-site activities that could include a sporting goods store; desert tours; and
- Activities connected with the adjacent BLM lands.

Furthermore, both vehicular and pedestrian oriented desert tour excursions into certain portions of the desert will be provided to allow the public to see the natural resources of the area generally under the direction and control of a tour guide. These tours could be excursions through the sand dunes

via OHVs in a controlled tour environment either through vehicles driven by the tour operator or with vehicles driven by individuals that would follow the tour guide in a controlled manner. In concert with the OHV-oriented recreational activities, vehicle repair vendors will be located within Vendor Row. All vehicle repair vendors will be required to conduct all operations over raised impervious concrete pads, or an equivalent station in order to prevent accidental spillage of hazardous materials (i.e., brake fluids) as a result of vehicle repair activities.

With the NADW directly to the northwest of the project vicinity, fencing will be installed along the north-western boundary of Planning Area 4 with interspersed signage to prevent OHV travel into the NADW as restricted by BLM. Prevention of OHV travel into the NADW will serve to preserve the natural resources present within the NADW. Interpretive signs describing the natural resources (i.e., desert tortoise and other wildlife, as well as native plants) and history of Glamis will be strategically placed throughout the project vicinity, with specific emphasis along the frontage abutting the NADW, for educational purposes. Interpretive signs will be collaboratively developed with BLM. Additionally, development of the project vicinity will incorporate avoidance and minimization measures to mitigate potential impacts to onsite and/or adjacent natural resources to the greatest extent. Such measures will include preconstruction surveys of sensitive wildlife species (i.e., flat-tailed horned lizard), presence of a biological monitor for each area of active construction, removal of all invasive plant species, among other applicable measures. The proposed Specific Plan will allow for the operation of multiple special events to enjoy the unique natural resources and elements provided by the Glamis area. Special events to be held within the project vicinity will allow for either public or private activity events allowing the assembly of a large numbers of people, including but not limited to; a concert, a trade show, an exhibition, a carnival, fireworks display, OHV activities including races, a stunt show, or exhibition, and similar uses. Proposed temporary special events will enhance and continue to build from the historical momentum of the Glamis area regarding past off-road events and the world-wide notoriety as the epicenter of the sand dunes OHV experience. Special events, such as Camp RZR, to be held at the project vicinity will be subject to the standards set within the proposed Zoning Ordinance, and the standards/protocols listed within the SEMP (described further below in this Section). All proposed special events will implement adequate safety procedures and protocols to ensure safe OHV accessibility to ISDRA.

4.2.7.1 Conceptual Open Space and Recreation Plan Guidelines

- All private recreational facilities and open spaces shall be maintained by the Applicant.
- Landscaping will be desert scape and minimal to be consistent with the existing nature of the project site and achieve reduced water consumption.
- Preservation operations and physical development will consider and protect the adjacent natural resources.

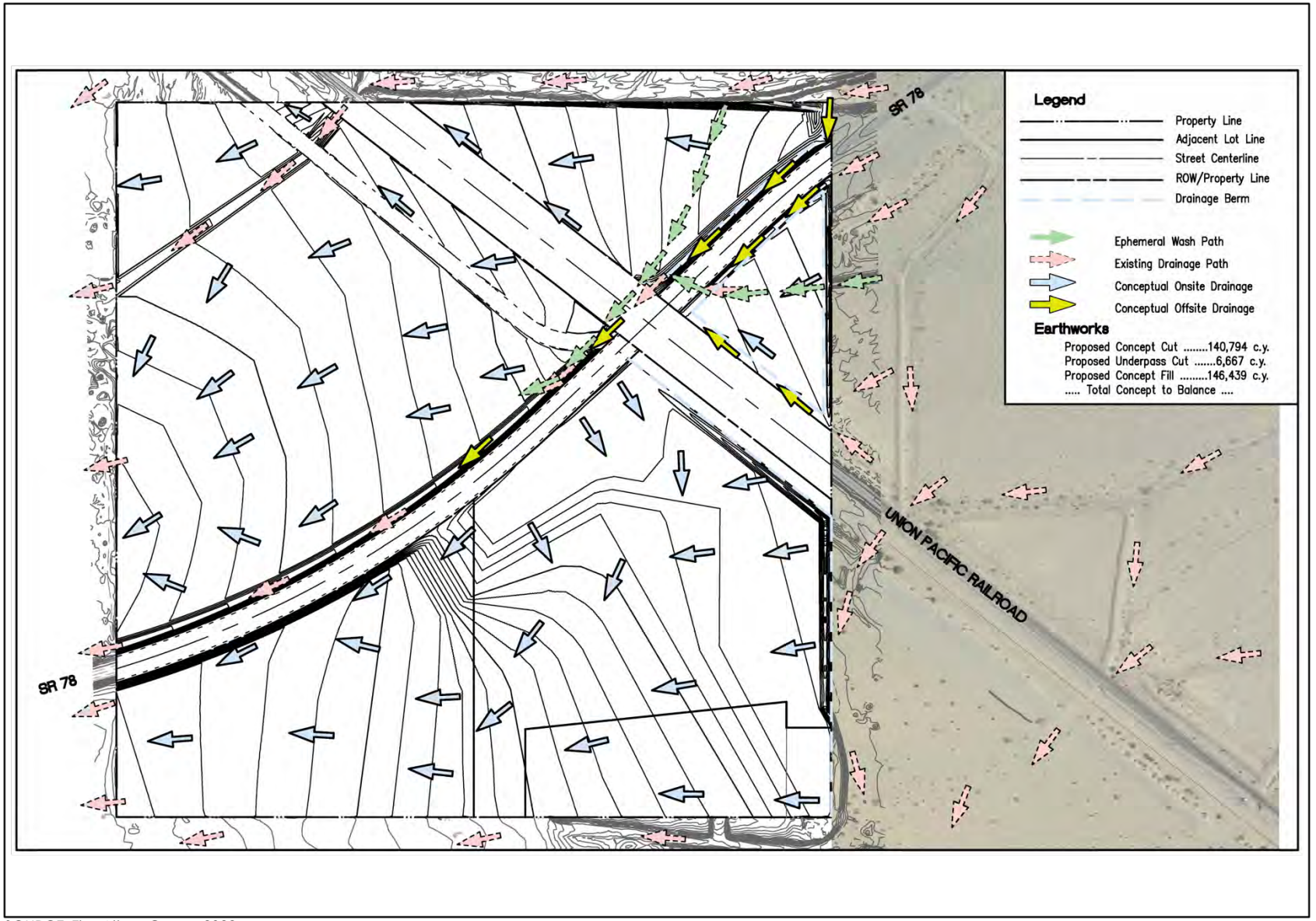
4.2.8 Grading Plan

The purpose of the conceptual grading plan (Figure 4-8) promotes contours similar to existing conditions of the project site; however, it increases the area protected from flooding and provides for more flexibility in creating fluent layouts for each of the conceptual Planning Area needs.

The use of the existing and modified earthen channels and berms for the project assist in providing an environment similar and consistent with the surrounding drainage patterns and practices. The manner of capture, conveyance and release of the drainage flows around and/or through the Planning Areas also assists in preserving the historical pattern of natural drainage courses. Finally, the conceptual grading and drainage plan, helps the proposed Specific Plan to meet the site drainage requirements and County guidelines.

4.2.8.1 Conceptual Grading Plan Standards

- Precise grading plans will be prepared for each phase of development of the proposed Specific Plan. Precise grading plan(s) will comply with the basic development standards and criteria described herein.
- All grading activities shall conform to County standards, shall be in substantial conformance with the Conceptual Grading Plan and shall implement any grading related mitigation measures.
- Prior to development within any Planning Area, an overall Conceptual Grading Plan for the site and the individual development area shall be submitted for County Planning Department approval. The overall Conceptual Grading Plan shall be used as a guideline for subsequent detailed grading plans for individual stages of development within that Planning Area. Such plans shall include techniques employed to prevent erosion and sedimentation as well as eliminate source pollutants during and after the grading process; approximate time frames for grading activity; identification of areas which may be graded during high probability rain months; and preliminary pad elevations. Grading work shall be balanced onsite wherever possible.
- A grading permit shall be obtained from the County prior to the start of grading activities.
- If any historic or prehistoric resources are discovered during grading, a qualified archaeologist shall be consulted to ascertain their significance, as specified in the project environmental document.
- The proposed Specific Plan will comply with all National Pollutant Discharge Elimination System permit requirements prior to commencing grading activities.



SOURCE: The Altum Group, 2022.

Conceptual Grading and Drainage
Glamis Specific Plan
Figure 4-8

- If human remains are discovered, work shall halt in that area and procedures set forth in California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be followed, including notification of the County Coroner. If Native American remains are present, the County Coroner shall contact the Native American Heritage Commission to determine and designate a Most Likely Descendant.

4.2.9 Special Events

4.2.9.1 Short Term Event Standards and Approval

The project vicinity has hosted a number of exciting OHV and entertainment programs over the years that are open to the general public, with attendance ranging from a few hundred to 20000 persons. The GSP provides for the continuation of such specialty events. To ensure proper health, safety and environmental management, the GSP requires the preparation of SEMP that addresses protocols and topics contained herein. The SEMP and the SEMP Notification are described in Section II of the Glamis Specific Plan. The SEMP will be applicable to individual public events and include standards and protocols to be implemented for each type of event based on the size of the attendance of that event. The SEMP will establish a distinctive set of Standard Conditions to allow Special Events to occur without the need for an annual CUP or other discretionary approval by the County. These Standards are intended to be adhered to by the event sponsor at each public event (Table 4-1).

The SEMP will be accompanied with a SEMP Notification which will act as a checklist by the agencies involved in each event to ensure and convey compliance with the applicable protocols necessary to protect the public health and safety. Private events with limited attendance (300 or less attendees) and which are not open to the general public would not be considered a Special Event and would be exempted from submitting a SEMP notification. Prior to each event, a SEMP would be prepared and accompany the Special Event Management Plan notification to the County. The SEMP notification would be subject to administrative approval outlined in the GSP Zoning Ordinance. If the applicant's SEMP Notification is approved by the County there will be no need to have a public hearing for the event. However, if there are Standards within the SEMP Notification that are not approved by the Director then the application can be forwarded to the Planning Commission and Board of Supervisors on appeal for their review.

Once approved by the County of Imperial, the SEMP will be disbursed to all involved agencies. Special Events that are not open to the general public but held within the GSP boundary and that have no more than 300 participants would be exempt from the SEMP. Table 4-2 below shows the components of current special events in the project vicinity. Under the GSP, it is anticipated this number could double to six events per year to coincide with the major holiday periods during the season. Lighting, water, and wastewater services would be provided as part of the overall proposed improvements for the project vicinity.

TABLE 4-1 SUMMARY OF SPECIAL EVENTS STANDARD CONDITIONS

Event Type	Attendance	Standard Conditions
OHV and other entertainment programs including but not limited to product displays, music concerts, shows, vendor displays, etc.)	Up to 5,000 people per day.	<u>Medical</u> Based upon the type of event, site layout and projected attendance the SEMP shall address the following: 1. The specific number of medical personnel will be established based on the size of the Event. 2. There shall be adequate medical staff onsite during all event operating hours. 3. Locations of medical facilities based on event layout and projected attendance. 4. Sample of appropriate signage to be used to direct event attendees to the medical facilities. 5. A helipad is proposed on the property to allow for quick access. The helipad will be used for both general use as well as emergency use. A description of appropriate fencing and signage that will be placed to provide a safe and secure area for helicopters to land and take off. <u>Imperial County Sheriff's Department</u> Based upon the type of event, site layout and projected attendance the SEMP shall address the following: 1. The specific number of law enforcement personnel will be established; and 2. There shall be adequate law enforcement staff onsite during all event operating hours. <u>Imperial County Fire Department</u> Based upon the type of event, site layout and projected attendance the SEMP shall address the following: 1. The specific number of fire department personnel will be established; 2. There shall be adequate fire department staff onsite during all event operating hours; and

TABLE 4-1 SUMMARY OF SPECIAL EVENTS STANDARD CONDITIONS

Event Type	Attendance	Standard Conditions
		3. An appropriate amount of fire apparatus will be provided. California Highway Patrol Based upon the type of event, site layout and projected attendance the SEMP shall address the following: 1. The specific number of officers will be established; and 2. If required, adequate California Highway Patrol personnel will be onsite during all event operating hours. California Highway Patrol may be directing traffic on Hwy 78 and on/off the event parking lots. They will manage the highway traffic. California Dept. of Transportation (CALTRANS) Based on the type of event coordination with CALTRANS the SEMP shall address the following: 3. An interim traffic management plan. Imperial County Public Health Department When an event has food vendors, the event and those food vendors will file for a "Community Event Organizer Permit" and Temporary Food Facility Permits as required by the Public Health Department. Private Security 1. In order to supplement the efforts of law enforcement staff, additional private security will be contracted to help monitor all gates within the Event. The security contractor will be onsite beginning with the staging activities before the event. 24-hour security will be provided throughout the weekend. Parking Attendants 1. Parking areas will be delineated for each Event. Attendants will be assigned

TABLE 4-1 SUMMARY OF SPECIAL EVENTS STANDARD CONDITIONS

Event Type	Attendance	Standard Conditions
		to direct traffic to the parking areas. There will also be signage placed to efficiently direct travelers to the parking areas. <u>Trash & Recycling Attendants</u> 1. There will be an appropriate number of dumpsters provided onsite for each Event. The number of dumpsters will be determined by the type of event, the time of day of the event, the projected number of attendees and the size of the designated area. <u>Venue Entry Points</u> 1. Based upon the type of event and attendants the SEMP will provide an appropriate number of points of entry around the venue. 2. These will be clearly marked as entry points with directional signage. 3. Any secondary fenced-in entertainment areas inside the special event venue that requires a ticket for entry will have two security guards at each entrance. 4. If tickets are required, staff will be checking tickets upon entry and there will be a minimum of two security guards at each entrance. 5. All attendees that enter a Special Event requiring a ticket must have a ticket <u>Special Event Lighting</u> 1. All on-site lighting shall comply with Title 9 of the Land Use Ordinance of the County of Imperial and the following: 2. Lighting within the project area shall be low intensity and shielded to prevent spillover to adjacent properties. 3. All lighting at the property line shall have back-flow screens to prevent spillover to the adjacent properties.

TABLE 4-1 SUMMARY OF SPECIAL EVENTS STANDARD CONDITIONS

Event Type	Attendance	Standard Conditions
		4. All building mounted lighting shall also be focused down directly on the ground so to avoid spillover to adjacent properties. 5. All lighting on the project site shall follow the guidelines listed above, except that: 6. Both private events and large special events with 100 or more attendants expected are allowed to use higher intensity lighting for the duration of the event in order to create a safe environment for all attendees. <u>Emergency Evacuation Plan</u> 7. An emergency evacuation plan will be included in the SEMP that indicates escape routes to vacate the site. These will be posted on several placards throughout the site, as indicated in the SEMP. <u>Service Areas</u> 1. The SEMP will also include the following: • Temporary RV and Trailer Parking • The SEMP may provide for temporary RV and trailer parking for Event sponsors, staff, participants and attendees, within the Special Event area. Temporary RV and trailer parking guidelines will include general requirements for site access, layout, temporary services (if any) and emergency access. The Temporary RV and trailer parking will have time limits on the length of stay for all event staff. Event sponsors, staff, participants, and attendees shall be limited to entering the RV and trailer parking area no more than ten days prior to the event for event set up and must leave the RV and trailer parking area no more than

TABLE 4-1 SUMMARY OF SPECIAL EVENTS STANDARD CONDITIONS

Event Type	Attendance	Standard Conditions
		seven days following the event, for the purpose of event tear down. Handicap Parking 1. Handicap parking will be available at the venue. The number of handicapped spaces will be determined by the number of anticipated event attendees. These areas will be clearly marked with signage for each space. Portable Toilets and Hand Wash Stations 1. The number of portable toilets and hand wash stations based on the size of the event, that will be located throughout the venue as indicated on the site layout Drinking Fountains 1. An appropriate amount of drinking fountains will be placed throughout the venue. If drinking fountains are not to be used, the SEMP shall include alternative sources for drinking water. Temporary structures/stages 2. Any temporary structures or stages shall comply with the California Building Code and be reviewed and approved by the Imperial County Building and Safety Department as applicable.

TABLE 4-2 CURRENT SPECIAL EVENTS IN THE GSPA

Event Description						
Number of Events	**Anticipated Daily Attendees**	**Hours per Day**	**Days per Event**	**Number of Display Areas**	**Individual Display Areas (SF)**	**Season**
3	20,000	13	4	25-44	5,000	Oct 1 to May 1
Services						
Water Trucks	**Lighting**		**Water**		**Waste-water**	
• 10 per day Holiday (Weekends & Weekdays) • 4 per day (Non-Holiday Weekend) • 2 per day (Weekday)	Diesel Generators		Unknown		Porta John	

4.3 Project Build Out

The proposed Specific Plan would guide the evolution of the GSPA. The proposed Specific Plan would implement the County's objectives for the development of this area which is to *accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities* (Imperial County General Plan Land Use Element, 2015).

Projections of future land use changes in the project vicinity must account for factors such as the size of the site, existing levels of development; natural and built environmental constraints (e.g., water availability and SR-78), which may limit development potential; economic growth forecasts; market demand for new land uses; and the effect of County policies and standards on the location, type and amount of allowable growth.

This Program EIR analyzes the effect of potential land use changes that could occur in the GSPA from 2023 to 2050 as a result of the implementation of the proposed Specific Plan. Potential land use changes were assessed based on a methodology that reflects the proposed land use changes that would be projected to occur over a 20 to 50-year period beginning with the County's adoption of the proposed Specific Plan. The methodology consisted of:

- Reviewing the proposed land uses in the proposed Specific Plan.
- Estimating the amount of potential developable area in each Planning Area.
- Reviewing pending projects (pipeline proposals).

- Assessing historical development trends and market conditions.
- Assessing anticipated future improvements relative to regional land use trends.
- Evaluating potential horizon year projects tempered by local knowledge, market analysis by economic consultants, and proposed County Development policies and standards.

Based on this methodology, it is estimated that land use changes potentially occurring over the next 20 to 50 years would potentially result in a maximum of approximately 75 acres of net new development (see Tables 4-3a and b). These 75 acres of net new development represents the maximum development that could occur in the project vicinity. This scenario reflects the County's commitment to managing and monitoring change in ensuring that new projects.

Financing Plan

The project will be implemented in four phases as described below. The major infrastructure and facilities within the project vicinity will be financed through appropriate funding mechanisms acceptable to the County of Imperial, which may include, but necessarily be limited to: private and/or developer(s) financing; the formation of one or more assessment district(s); and/or the application of funds from County, State and other agency programs.

4.4 Project Phasing

The timing of development within the GSPA would be subject to local, regional, and national market conditions. Accordingly, the Project Site could be developed in up to four (4) phases, with the earliest construction beginning in late 2012 (Table 4-3a and Figure 4-9). No uses would be opened prior to 2023 (opening year). The build-out year would be 2051/2071.

Market conditions will be the primary determinant of project phasing. In addition, phases may need to be adjusted due to unforeseen circumstances. The GSP establishes "areas" which are not to be confused with parcels nor with any specific land uses allowed. The approach to Phasing is driven by a number of factors, including, but not necessarily limited to: (1) market conditions; (2) connectivity with and proximity to access; (3) the logical extension of key utility and infrastructure facilities; (4) efficient grading progression; and, (5) Polaris goals and objectives prioritization of projects.

Additionally, infrastructure requirements, public safety including legal and safe vehicular and pedestrian travel on and off the project site shall always be carefully considered and to the extent that there are regulatory requirements, or industry standards where available and applicable, they shall be met. The Phasing Plan does not apply to short term special events, only permanent development within the GSPA.

TABLE 4-3A: PROPOSED DEVELOPMENT SCENARIO AND PROJECT TRIP GENERATION (UPDATED BASED ON MEETING JUNE 24, 2021)

Proposed Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour				PM Peak Hour			
		Rate (a)	Volume	Rate	In: Out Split	Volume In	Volume Out	Rate	In: Out Split	Volume In	Volume Out
Phase One											
R&D Facility (b)	5,000 SF	16.19 /KSF	81	1.92	83:17	8	2	2.45	32:68	4	8
Hotel / Motel	20 Rooms	8.36 /Room	167	0.47	59:41	6	3	0.60	51:49	6	6
Restaurant Expansion	4,000 SF	112.18/KSF	449	9.94	55:45	22	18	9.77	62:38	24	15
Retail Expansion	2,000 SF	37.75 /KSF	76	0.94	50:50	1	1	3.81	48:52	4	4
Service Center (c)	4 Bays	12.48/Bay	50	1.52	68:32	4	2	2.17	32:68	3	6
RV Park (d)	10 Sites **(2)**	4.00/Site	40	0.21	36:64	1	2	0.27	65:35	2	1
Phase Two											
Vendors (e)	-	NA	200	-	-	5	5	-	-	5	5
Special Event Area	-	NA	Note 3	-	-	-	-	-	-	-	-
Emergency Medical Facility	-	NA	Note 3	-	-	-	-	-	-	-	-
Phase Three											
Multi-Family Residential / Staff/Guest Housing	14 DU	7.32 /DU	102	0.46	23:77	1	5	0.56	63:37	5	3
RV Park	20 (**2**)	4.00/Site	80	0.21	36:64	1	2	0.27	65:35	3	2
Phase Four											
Guest Housing	Note 3	NA	Note 3	-	-	-	-	-	-	-	-
RV Storage		NA	Note 3	-	-	-	-	-	-	-	-
Special Event Space		NA	Note 3	-	-	-	-	-	-	-	-
TOTAL TRIPS			**1,245**			**49**	**41**			**56**	**50**

TABLE 4-3A: PROPOSED DEVELOPMENT SCENARIO AND PROJECT TRIP GENERATION (UPDATED BASED ON MEETING JUNE 24, 2021)

Proposed Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour				PM Peak Hour			
		Rate (a)	Volume	Rate	In: Out Split	Volume In	Volume Out	Rate	In: Out Split	Volume In	Volume Out

Notes

a Trip generation rates are based on the 10th edition of the Trip Generation Manual, Institute of Transportation Engineers (ITE).

Notes:

b. "Small Office Building" Rate assumed.

c. Weekday ADT rate not provided by ITE. Therefore, the Saturday ADT rate of 12.48 trips per service bay was used.

d. Weekday ADT rate not provided by ITE. Therefore, the SANDAG ADT rate of 4 trips per site was used.

e. No additional vendors are expected as a part of the Project. However, in order to provide a conservative trip generation calculation, an additional 200 ADT was assumed.

(1) Use shown on Specific Plan (Conceptual Land Use Plans)

(2) Total of 30 RV Spaces split between Phase Two and Phase Three (pers. comm. J. Heuberger June 23, 2021.

(3) Included under “Vendors”

(4) Trips included under Phase Three development

NA = Not Applicable

SF= Square Feet

TABLE 4-3B: PROPOSED PUBLIC IMPROVEMENTS

Public Improvements	Summary Description	Phase	Planning Area (s)	Notes
INFRASTRUCTURE				
Public Restrooms/Showers	No description provided in Specific Plan	Phase One	Planning Area 1	
Potable Water Facilities (3)				
Water Well	New water well (25 AFY)	Phase One	Planning Area 1	
Potable Water Distribution Pipelines	Install potable water distribution lines to serve proposed uses	Phase One	Planning Areas 1 and 5	
		Phase Two	Planning Area 1	
		Phase Three	Planning Area 6	
		Phase Four	Planning Areas 2 and 4	
Wastewater Facilities				
Sewage Treatment Facility (Package Plant) **(4)**	Sewage Package Plant, Effluent Discharge Basin(s)/Pond(s)	Phase Three	Planning Area 6	
Sewer Pipeline - Gravity	Install wastewater pipelines to transport wastewater from proposed development(s) to Septic Tank/ Lift Station	Phase One	Planning Area 1	Development Scenario assumes wastewater will be collected in Septic Tank until Sewage Treatment Facility is operational.
	Install wastewater pipelines to transport wastewater from proposed development(s) to Septic Tank/ Lift Station	Phase Two	Planning Area 1	
Wastewater (Continued)				

TABLE 4-3B: PROPOSED PUBLIC IMPROVEMENTS

Public Improvements	Summary Description	Phase	Planning Area (s)	Notes
Sewer Pipeline - Gravity	Install wastewater pipelines to transport wastewater from proposed development(s) to Septic Tank/ Lift Station	Phase Three	Planning Areas 5 & 6	
Sewer Pipeline - Gravity	Install wastewater pipelines to transport wastewater from proposed development(s) to Septic Tank/ Lift Station	Phase Four	Planning Areas 2 and 4	
Sewer Septic Tank and Lift Station (2)	Sewer Septic Tank	Phase Two	Planning Area 1	
Sewer Pipeline - Force Main	Install wastewater pipelines to transport wastewater from Lift Station to Sewage Package Plant	Phase One	Planning Area 1	
		Phase Two	Planning Area 1	
		Phase Three	Planning Area 6	
TRANSPORTATION				
Helipad	No description provided in Specific Plan	Phase One	Planning Area 1	
Glamis Main Street Corridor (7)	• Circulation/Pedestrian interconnection between Phase One and Phase Four areas (undercrossing or overcrossing). • Will serve as a circulation corridor for OHV traffic to and from the dunes and to Planning Areas 2, 3, & 4 located directly north of SR 78	Phase One	Planning Area 1	
		Phase Two	Planning Area 1	
		or Phase Four4	Planning Areas 2, 3 & 4	
TRANSPORTATION (Continued)				
		Phase One	Planning Area 1	

TABLE 4-3B: PROPOSED PUBLIC IMPROVEMENTS

Public Improvements	Summary Description	Phase	Planning Area (s)	Notes
Glamis Main Street Corridor (Continued) (7)	• Includes new intersection and associated improvements (acceleration/deceleration lanes, left/right turn pockets, physical barrier along project frontage, etc.)	Phase Two	Planning Area 1	
		or Phase Four4	Planning Areas 2 & 3	
	• Traffic Signal at intersection (6)	Phase One	Planning Area 1	
		Phase Two	Planning Area 1	
		Phase Three or Four	Planning Areas 2 & 3	
Sand Highway Emergency Access	Provide emergency vehicle access from SR 78 to Planning Area 1	Phase Two	Planning Area 1	
Wash Road	Provide vehicle access to Planning Areas 7 and 8.	Phase One	Planning Areas 7 and 8	
ENERGY				
Option A - PV Solar Energy Generation + Battery Energy Storage System (BESS) (1) (5)	6.5 MW (Total at Build Out) with 4 MW/25 MWh BESS (*)	Phases One	Planning Area 1	Option selected will be determined subsequent development plans.
		Phase Two	Planning Area 1	
		Phase Three	Planning Area 5	
		Phase Four	Planning Area 4	
Option B - IID constructs transmission/distribution line from nearest substation. (8)	7.2 miles in length from nearest substation	Phase One	Planning Area 1 + off site alignment and connection to substation	Development Scenario assumes improvement would be implemented during Phase One.

TABLE 4-3B: PROPOSED PUBLIC IMPROVEMENTS

Public Improvements	Summary Description	Phase	Planning Area (s)	Notes

Sources: Altum Group, 2022.
(*) Response to Request for Development of Polaris Experience Microgrid. Prepared by ZGlobal, June 2020.

Notes:

AFY = Acre-feet per year
BESS = Battery Energy Storage System

(1) Uses shown on Specific Plan (Conceptual Land Use Plans)
(2) Development Scenario assumes septic tank and lift station will be housed underground to prevent odors. Monitoring equipment may be above ground.
(3) Water treatment plant with 15 gal/min capacity currently in operation.
(4) Development Scenario assumes wastewater will be collected in Septic Tank until Sewage Treatment Facility is operational.
(5) Final Option will be determined as part of subsequent development plans.
(6) Signalization of intersection would occur when warranted by future traffic volumes
(7) Final design to be coordinated with County Dept. of Public Works and Caltrans to determine specific design elements.
(8) Development Scenario assumes improvement would be implemented during Phase One.

SOURCE: The Altum Group, 2022.

Project Phasing Plan
Glamis Specific Plan
Figure 4-9

4.4.1 Phase One

It is noted that while market conditions constitute the primary determinant for the incremental development within the Planning Area, said conditions are inextricably linked to the other factors. As shown in Figure 4-10 and 4-11 and Table 4-3a, development of Phase One will occur where the existing Glamis Beach Store, Restaurant and Bar, and OHV repair facility are located as contained within Land Use Area One (Assessor Parcel Number [APN] 039-310-029). Phase One would be contained within Planning Area 1, with the exception of possible development of a research and development (R&D) facility which would occur in Planning Area 5 (039-310-026) and an RV park in Planning Area 6 (APN 039-301-023). Part of Land Use Area Seven (APN 039-310-030) could be developed during Phase One as it slightly overlaps onto current land used for Camp RZR.

This area also represents the closest point of access to surrounding public roadways, most notably SR-78 and Ted Kipf Road, both of which will continued to be travelled by visitors to the area.

Infrastructure /Public Improvements

Before certain significant permanent structural improvements are made to this area, required and necessary infrastructure improvements will be made. Potable water, wastewater treatment and electrical service may need to be expanded to accommodate the projected demand from the specific improvements and visitors. There may be some improvements made within this parcel that are not dependent on such services and therefore could be implemented ahead of the infrastructure. The first required infrastructure improvement would be the expansion of a water treatment system, which would treat ground water extracted from an existing onsite well and a proposed new well. An as yet unpermitted public water treatment plant complying with California standards has been constructed to meet the needs of the current uses, and with room for expansion to future water needs of the GSPA. This system would eventually need to be re-permitted as a community water system.

As new development is implemented, this water plant may need to be expanded as determined by the regulatory agencies.

The second required infrastructure improvement may be the development of a wastewater treatment system. Currently, wastewater generated by the Glamis Beach Store, restaurant and bar is discharged into an existing septic tank located near those buildings. For some initial development(s) septic system(s) may be possible and allowed. However, this decision relies entirely upon regulatory requirements. If and when a development is proposed, and a wastewater treatment system is required, that project will implement the required system(s). The amount of wastewater treatment infrastructure needed (i.e., secondary and tertiary treatment) would be determined by the amount and intensity of each structural improvement envisioned, and the amount of wastewater forecasted to be generated by each structural improvement. To assure wastewater does not exceed the treatment capacity at any given time during development of Phase One (and for all other subsequent phases), a wastewater generation analysis will be required for each structural improvement to determine whether existing wastewater infrastructure would, or would not need upgraded improvements in order to maintain wastewater treatment capacity.

SOURCE: The Altum Group, 2022.

Phase One Area
Glamis Specific Plan
Figure 4-10

SOURCE: The Altum Group, 2022.

Phase One with Conceptual Land Uses
Glamis Specific Plan
Figure 4-11

Infrastructure /Public Improvements

Before certain significant permanent structural improvements are made to this area, required and necessary infrastructure improvements will be made. Potable water, wastewater treatment and electrical service may need to be expanded to accommodate the projected demand from the specific improvements and visitors. There may be some improvements made within this parcel that are not dependent on such services and therefore could be implemented ahead of the infrastructure. The first required infrastructure improvement would be the expansion of a water treatment system, which would treat ground water extracted from an existing onsite well and a proposed new well. An as yet unpermitted public water treatment plant complying with California standards has been constructed to meet the needs of the current uses, and with room for expansion to future water needs of the GSPA. This system would eventually need to be re-permitted as a community water system.

As new development is implemented, this water plant may need to be expanded as determined by the regulatory agencies.

The second required infrastructure improvement may be the development of a wastewater treatment system. Currently, wastewater generated by the Glamis Beach Store, restaurant and bar is discharged into an existing septic tank located near those buildings. For some initial development(s) septic system(s) may be possible and allowed. However, this decision relies entirely upon regulatory requirements. If and when a development is proposed, and a wastewater treatment system is required, that project will implement the required system(s). The amount of wastewater treatment infrastructure needed (i.e., secondary and tertiary treatment) would be determined by the amount and intensity of each structural improvement envisioned, and the amount of wastewater forecasted to be generated by each structural improvement. To assure wastewater does not exceed the treatment capacity at any given time during development of Phase One (and for all other subsequent phases), a wastewater generation analysis will be required for each structural improvement to determine whether existing wastewater infrastructure would, or would not need upgraded improvements in order to maintain wastewater treatment capacity.

The third system of infrastructure improvement would be electrical service upgrades. The project site currently relies on diesel generators for all of its electrical power demand needs. It may not be a feasible option for significant new development to be reliant upon diesel generators in the future since air quality and GHG emissions regulations are likely to become more restrictive over time. With this in mind, three options are being evaluated to determine which available source of power supply would best fit as the preferred option for the project vicinity. The first option would to be for IID to construct and install a power line (transmission line and/or distribution line) to extend from the nearest substation (approximately 7.2 miles to the northeast). A second and potentially more viable option would be to develop a small commercial solar PV system, with a backup battery storage component or another green power system.

4.4.2 Phase Two

Phase Two would most likely be within Planning Area 1, immediately west of Phase One (Figure 4-12 and Table 4-3a). Phase Two development would serve as an extension to development occurring within Phase One by incorporating land uses permitted under the CR Zone similar to those permitted in Phase One. Phase Two would also incorporate the Glamis Mainstreet to serve as a circulation corridor for OHV traffic to and from the dunes and to Phase Four (Planning Areas 2, 3, and 4) located directly north of SR 78. Figure 4-13 conceptually shows the layout for Planning Area 8. The Glamis Mainstreet corridor is proposed to provide an optional circulation interconnection between Phase One and Phase Four. The project applicant will first need to work with and create a nexus for interconnection as well as approvals between State, County of Imperial, and agencies as to the appropriate safe type of highway crossing (undercrossing or overcrossing) to be constructed across SR-78. This process will ensure that the crossing is designed to incorporate all required safety measures to the fullest extent possible.

4.4.3 Phase Three

The Phase Three area is located on the northeast side of the UPRR and is located south of SR-78 (Figure 4-14 and Table 4-3a). Phase Three is located within Planning Areas 5 and 6. No major public use facilities would be considered for development within these two APNs to discourage OHV traffic from crossing the UPPR lines to access these areas. Phase Three however, would is projected to include development of uses relevant to employee housing, RV park, and/or a R&D facility and possible PV Solar array system (Figure 4-15).

4.4.4 Phase Four

Phase Four would be located on the north side of SR-78 within Planning Areas 2, 3 and 4 (Figure 4-16 and Table 4-3a). Most of the infrastructure improvements for this phase will be based on regulatory, safety and liability concerns, and consequently, will require specific infrastructure improvements to be in place prior to development (Figure 4-17, *Phase 4 with Conceptual Land Uses*).

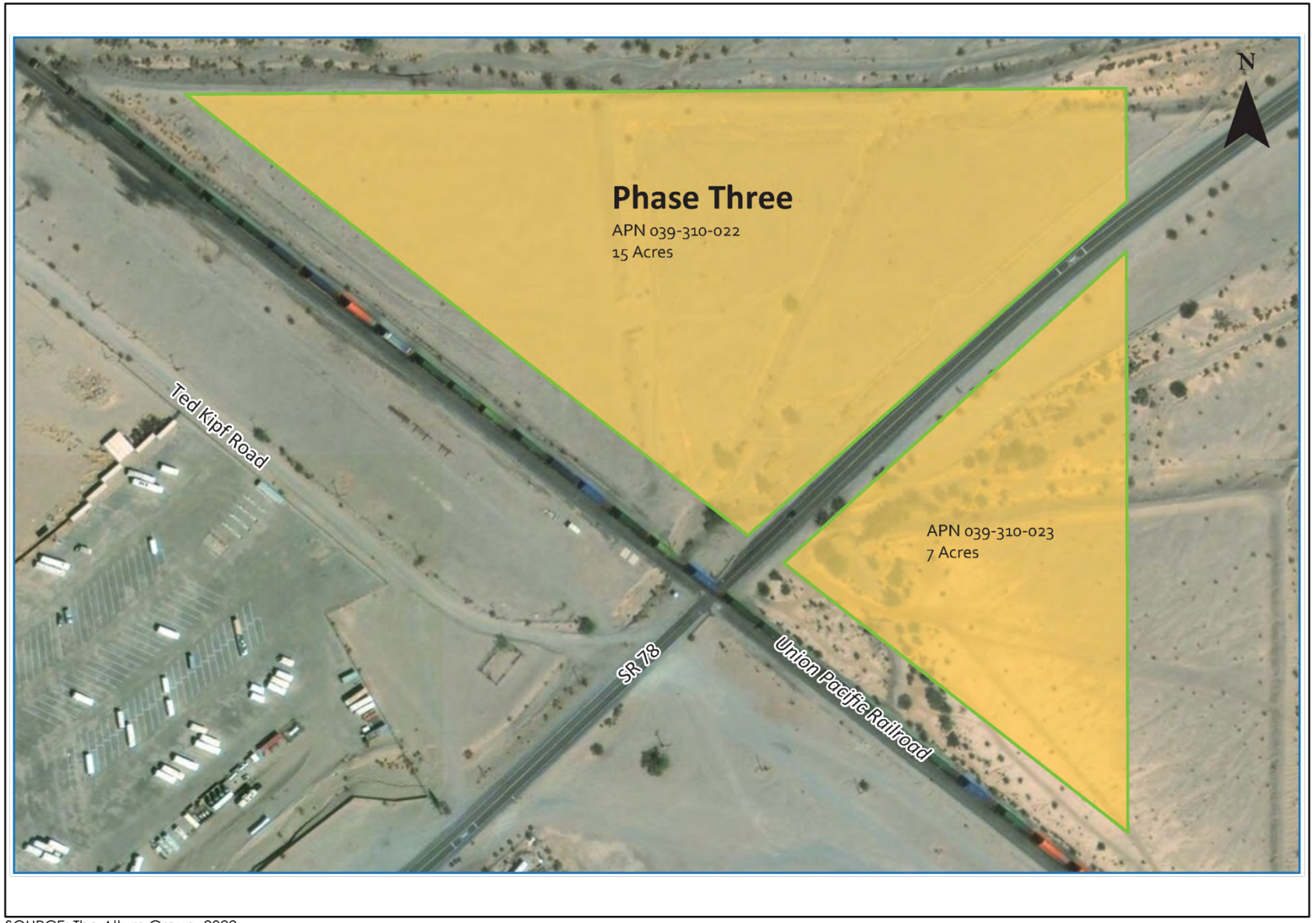
All Phasing as proposed will be impacted by possible requirements that Caltrans may impose along SR 78 and for crossing the UPRR. As a separate project, the ICTC recently concluded a feasibility study for a safe crossing over the UPRR lines for OHVs using a new overhead structure located just south of SR 78 and carrying a new OHV trail over the UPRR rail line and Wash Road.,. The proposed Specific Plan does not encourage or desire to have OHVs cross the UPRR lines, therefore the proposed Specific Plan parcels on the northeast side of the UPRR are proposed to have very restricted uses.

SOURCE: The Altum Group, 2022.

Phase Two Area
Glamis Specific Plan
Figure 4-12

SOURCE: The Altum Group, 2022.

Phase Two Conceptual Land Uses
Glamis Specific Plan
Figure 4-13



SOURCE: The Altum Group, 2022.

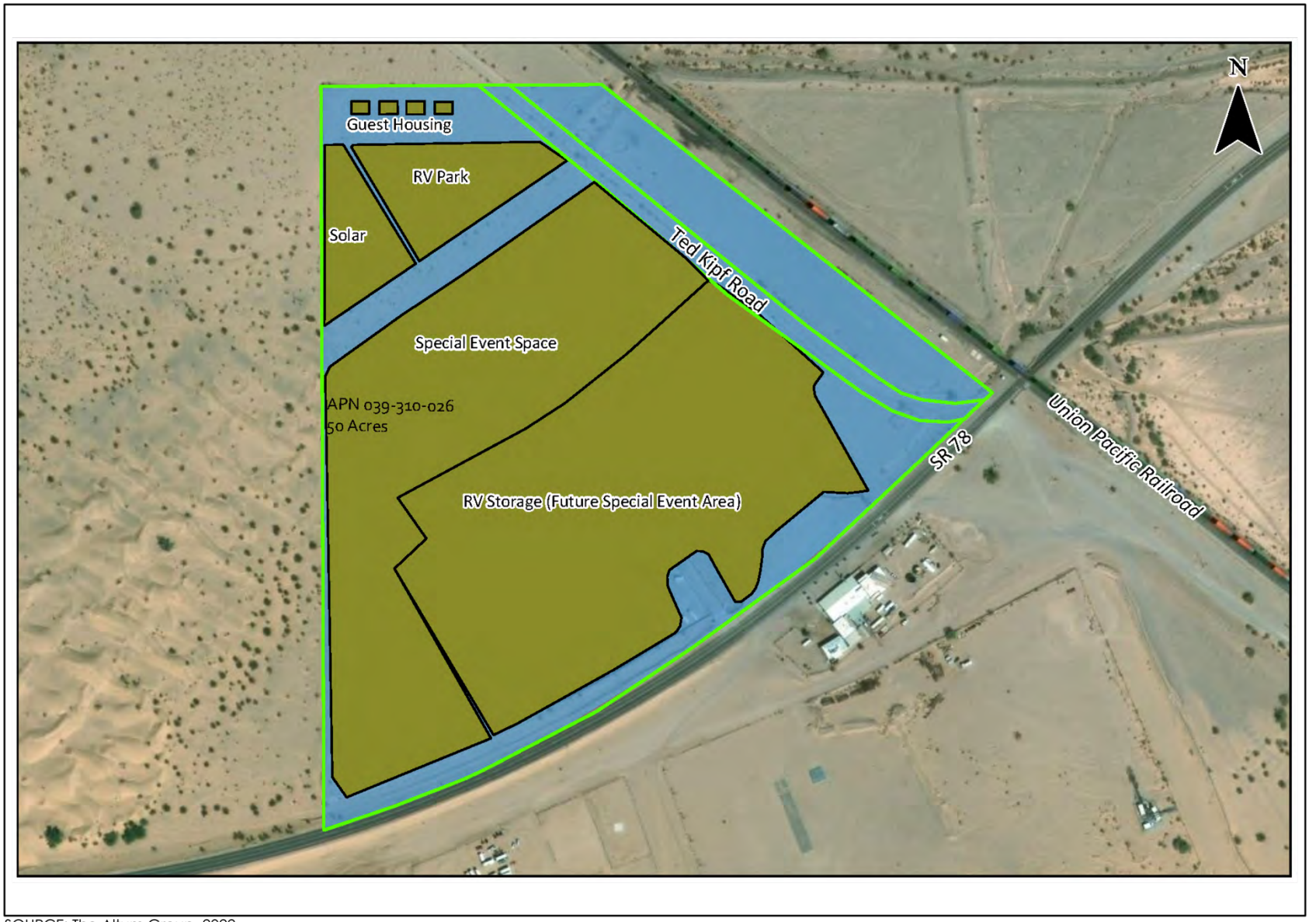
Phase Three Area
Glamis Specific Plan
Figure 4-14

SOURCE: The Altum Group, 2022.

Phase Three Conceptual Land Uses
Glamis Specific Plan
Figure 4-15

SOURCE: The Altum Group, 2022.

Phase 4 Planning Area
Glamis Specific Plan
Figure 4-16



SOURCE: The Altum Group, 2022.

Phase Four Conceptual Land Uses
Glamis Specific Plan
Figure 4-17

4.5 Required Actions and Approvals

If adopted, the proposed Specific Plan would replace any currently applicable standards from the County's General Plan. The County is the Lead Agency for the proposed Specific Plan, consistent with CEQA Guidelines Section 15065(b). As such, this Program EIR will be used by the County to both evaluate the potential environmental impacts that could result from implementation of the proposed Specific Plan and develop conditions of approval and adopt mitigation measures which would address those impacts. The Board will consider adoption of the proposed Specific Plan concurrently with certification of the Final EIR. Pursuant to CEQA Guidelines Section 15093, the decision-makers must "balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." If the County, as Lead Agency, approves the proposed Specific Plan, a statement of overriding considerations must be written, which shall state the specific reasons to support its action based on the Final EIR and/or other information in the record.

Implementation of the proposed Specific Plan would require the following regulatory and/or legislative actions by the Board of Supervisors, with a recommendation from the Planning Commission:

- General Plan Amendment;
- Specific Plan Adoption;
- Change of Zone; and
- Conditional Use Permit(s) for a new water well.

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

The specific approvals anticipated to be required from the lead agency, trustee agencies, and/or responsible agencies are listed in Table 4-4.

TABLE 4-4. ANTICIPATED FUTURE DISCRETIONARY ACTIONS

Jurisdiction Level	Permit, Approval or Report	Agency	Purpose
Federal	Section 404 of the Federal Clean Water Act Permit	U.S. Army Corps of Engineers (USACE)	Regulates discharge of dredged and/or fill material into Waters of the United States
State	Encroachment Permit	California Department of Transportation (Caltrans)	Required for construction activities and/or improvements within the SR-78 right-of-way (ROW)
State	Intersection Control Evaluation	Caltrans	Required for proposed improvements to intersections on SR-78.
State	Encroachment Policy Exception per Project Development Procedures Manual (PDPM) Chapter 17.	Caltrans	Required for any new propose access point with SR-78 ROW.
State	1602 Lake and Streambed Alteration Agreement	California Dept. of Fish & Wildlife (CDFW)	Required for construction activities in or adjacent to streams, wetlands and waterbodies
State	401 Water Quality Certification	California Regional Water Quality Control Board, Colorado River Basin, Region 7 (RWQCB)	Required for federal permits that may result in discharges of pollutants to Waters of the United States
State	Section 401 of the Federal CWA, National Pollutant Discharge Elimination System (NPDES) General Permit for Discharge of Construction Related Stormwater	RWQCB, Region 7	Management of stormwater during construction. Preparation and implementation of Stormwater Pollution Prevention Plans (SWPPPs). Notice of Intent (NOI) to obtain covered under the general permit also required.
State	Section 402 of the Federal CWA, National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater	California State Water Resources Control Board (SWRCB)	Regulates the discharge of storm water associated with industrial activities that could occur with the RV Service Center(s).

TABLE 4-4. ANTICIPATED FUTURE DISCRETIONARY ACTIONS

Jurisdiction Level	Permit, Approval or Report	Agency	Purpose
	Discharges Associated with Industrial Activities		
State	Waste Discharge Requirements	RWQCB, Region 7	Required for waste discharges exceeding 5,000 gallons to land from expansion of the existing wastewater treatment plant
Local	General Permit for Discharge of Construction Related Stormwater	RWQCB, Region 7	As directed by the RWQCB, monitor development and implementation of Stormwater Pollution Prevention Plans (SWPPPs) and other aspects of the NPDES permit for stormwater discharges associated with construction activities that disturb more than 1 acre of land.
Local	Specific Plan (SP 19-0001), CUP amendment (#19-0027), and Zone Change (#19-0006)	ICPDSD	Required for development of the Glamis Specific Plan.
Local	Authority to Construct, Permit to Operate, Permit for Alteration/ Modification, Emission Reduction Credits, Rule 310 and Rule 403 Permit (Fugitive Dust)	Imperial County Air Pollution Control District (ICAPCD)	Consultation and permitting for air pollution, including fugitive dust, and Greenhouse Gas (GHG emissions that may result from the implementation of future development activities. Authority to Construct - required prior to constructing, erecting, installing, modifying, or replacing any article, machine, equipment or contrivance, the use of which may emit or control air contaminants.

TABLE 4-4. ANTICIPATED FUTURE DISCRETIONARY ACTIONS

Jurisdiction Level	Permit, Approval or Report	Agency	Purpose
			Permit to Operate – required prior to operation of any article, machine, equipment, or other contrivance that emits air contaminants.
Local	Grading Permit	ICPDSD/ Imperial County DPW	Excavation or earthwork that involves over 2 feet in depth and/or fills over 1 foot in depth that may be required for implementation of future development activities.
Local	Traffic Control Plan	Imperial County DPW	Traffic management for lane closures during construction and during special events (if warranted)

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5.0 ENVIORNMENTAL ANALYSIS

This chapter evaluates the direct and indirect environmental impacts that would result from implementation of the Glamis Specific Plan (Specific Plan or proposed Specific Plan) which has been proposed by Polaris Industries (Polaris or the Applicant). The chapter includes sections for each of the following resource areas:

Resource Area Format

Each resource area section is organized under the following headings:

- Environmental Setting;
- Regulatory Setting;
- Impact Analysis; and
- Mitigation Measures.

Information contained under each heading is described below.

Environmental Setting

Each resource area section contains a discussion of the environmental setting (the existing environmental conditions in the vicinity of the entire Specific Plan area [project area]) and identifies the baseline physical conditions by which the significance of the Project's environmental impacts will be assessed. The baseline physical conditions for the proposed Specific Plan are the existing environmental conditions in the Glamis Specific Plan Area (GSPA) at the time of the publication of the Notice of Preparation (NOP) (October 2020). The discussion of the environmental setting in each resource area section contains information necessary to understand the potential impacts of the Project as well as alternatives to the Project (California Environmental Quality Act [CEQA] Guidelines §15125(a)).

Regulatory Setting

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

Impact Analysis

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

Significance Thresholds

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

Environmental Impacts

The impacts analyses presented in this chapter evaluate impacts that may occur from the potential development of the GSPA. The discussion evaluates the significance of impacts, identifies mitigation measure(s) for significant impacts, and provides a determination of significance after mitigation. The analysis also evaluates additional impacts that could result from implementation of the mitigation measures, if any.

Mitigation Measures

This section provides the text of mitigation measures specific to the resource area that would be implemented to reduce significant impacts of the Project.

Terminology

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

- **No Impact** indicates that the construction, operation, and maintenance of the project would not have any direct or indirect effects on the environment. It means no change from existing conditions. This impact level does not need mitigation.

- A **Less Than Significant Impact** is one that would not result in a substantial or potentially substantial adverse change in the physical environment. This impact level does not require mitigation, even if feasible, under CEQA.
- A **Significant Effect** on the environment is defined in CEQA Section 21068 as one that would cause "a substantial, or potentially substantial, adverse change in the environment", which includes any of the physical conditions within the area affected by the project as they exist at the time the notice of preparation is published." Levels of significance can vary by project, based on the change in the existing physical condition. Under CEQA, mitigation measures or alternatives to the project must be provided, where feasible, to reduce the magnitude of significant impacts.
- An **Unmitigable Significant Impact** is one that would result in a substantial or potentially substantial adverse effect on the environment, and that could not be reduced to a less than significant level even with any feasible mitigation. Under CEQA, a project with significant and unmitigable impacts could proceed, but the lead agency would be required to prepare a "statement of overriding considerations" in accordance with State CEQA Guidelines Section 15093, explaining why the lead agency would proceed with the project in spite of the potential for significant impacts.

Approach to the Cumulative Impact Analysis

CEQA Guidelines, Section 15130 requires that EIRs include an analysis of the cumulative impacts to determine if the project's effect is considered cumulatively considerable. As defined by CEQA Guidelines, Section 15065(a)(3), "…'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects..." Section 15130(b)(1) goes on to identify two approaches for performing a cumulative analysis: (1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or (2) A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. The cumulative analysis for the proposed Specific Plan utilized the list approach. According to Section 15130(b)(2), when using a list it is important to consider the nature of each environmental resource being examined, the location of the project, and its type. In keeping with these provisions, a list of cumulative projects was developed and includes projects known at the time of release of the NOP of the Draft EIR, as well as additional projects that have been proposed since the NOP date. Potential cumulative impacts are addressed in Chapter 7.0 of this EIR. Table 7-1 lists the potential cumulative projects, the locations of which are shown on Figure 7-1.

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5.1 Aesthetics

This section addresses potential direct and indirect environmental impacts to aesthetics and visual resources that would result from implementation of the proposed Glamis Specific Plan . The following discussion addresses the existing conditions in the planning area, identifies applicable regulations, analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential aesthetic impacts was derived, in part, from the *Glamis Specific Plan Area Visual Impact Assessment (VIA*) prepared by the Altum Group which is provided as Appendix D this Draft EIR (Altum Group, 2020c). While the Planning area is not within land under the jurisdiction of the Bureau of Land Management (BLM), the VIA used BLM's Visual Resources Inventory (VRI) classes system to describe and assess potential impacts on scenic values.

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from regulatory agencies. The following issues related to aesthetics were raised by the California Department of Fish and Wildlife (CDFW) and are addressed in this section:

- An evaluation of impacts to adjacent open space lands from construction, long-term operations and maintenance.

5.1.1. Environmental Setting

Regional Character

The Glamis Specific Plan Area (GSPA) is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the GSPA is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County. The GSPA contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by BLM. The Plan area is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California.

Directly northwest of the GSPA is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. Additionally, the Chocolate Mountain Aerial Gunnery Range (CMAGR) is located approximately three (3) miles north of the GSPA. Within all of the various BLM lands surrounding the GSPA, the BLM has designated Recreation Management Zones (RMZs) which dictate the allowable recreation activities and provide for BLM's management objectives within those areas (Figure 3-4).

Existing Visual Character

The GSPA is mostly comprised of open, sandy, disturbed desert and is intersected by SR-78 and the UPRR. All existing development occurs within approximately 0.25 miles of the intersection of SR-78 and the UPRR and consists of several adjoined one- and two-story metal building structures with water tanks which comprise the Glamis Beach Store. The GSPA also contains an existing paved RV storage lot immediately north of SR-78, wood posting for sectioned-off parking/vendor areas within the southwest portion of the GSPA, a wireless communications facility located within the southeast portion of the GSPA, a private residence/storage building next to an unmaintained storage shed with shipping containers at the southeastern corner of the GSPA, and an existing historical cemetery immediately south of Ted Kipf Road. There are no rock outcroppings and very few trees present within the GSPA. Currently, the only existing light sources within or nearby to the GSPA come from the Glamis Beach Store.

Glamis Specific Plan Area

The GSPA is relatively flat with a southwest-to-northeast trending grade of less than one percent or an approximate difference in elevation of 23 feet above mean sea level (AMSL) between the southwest corner (approximate elevation of 324 feet AMSL) and the northeast corner (approximately 347 feet AMSL). Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the GSPA. Public views of the GSPA would be primarily seen by viewers who are traveling east or west along SR-78. In addition, the GSPA is visible from adjoining BLM land such as the ISDRA and the NADW.

Light and Glare

Because of the limited development within the GSPA, substantive sources of light and glare, such as streetlights, parking lots, interior lights, and light emitted from non-residential buildings throughout the GSPA are minimal.

Wilderness Areas

Wilderness Areas are managed under the Wilderness Act of 1964 (Pub. L. 88–577) and generally do not allow motorized equipment, motor vehicles, mechanical transport, temporary roads, or permanent structures or installations. The NADW covers more than 26,000 acres and is managed by the BLM as a part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use. Camping is allowed throughout the area, however there is no water and no facilities for visitors within the NADW.

5.1.2. Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable in the GSPA.

Federal

Bureau of Land Management Visual Resource Management

The BLM uses a Visual Resources Inventory (VRI) classes system as a baseline description of the existing scenic values in the environment that does not provide objectives as to how the land should be used or managed. Given that the Project site is surrounded by BLM land, it was determined that the BLM VRI class system was an appropriate methodology to utilize for purposes of assessing baseline scenic values in the project area. All VRI descriptions used for this analysis are based on the BLM's VRI Classes identified in the Desert Renewable Energy Conservation Plan (BLM, 2016).

VRI classes are assigned through the inventory process. Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape. This includes National Wilderness Preservation System areas, National Wild and Scenic River System units, and other congressionally and administratively designated areas where decisions have been made to preserve a natural landscape. Classes II, III, and IV are assigned based on a combination of scenic quality, sensitivity level, and distance zones. This is accomplished by combining the three overlays for scenic quality, sensitivity levels, and distance zones and using the guidelines to assign the proper class. Inventory classes are informational in nature and provide the basis for considering visual values in the Resource Management Plan process. They do not establish management direction and should not be used as a basis for constraining or limiting surface disturbing activities. VRI classes surrounding the GSPA are depicted on Figure 5.1-1.

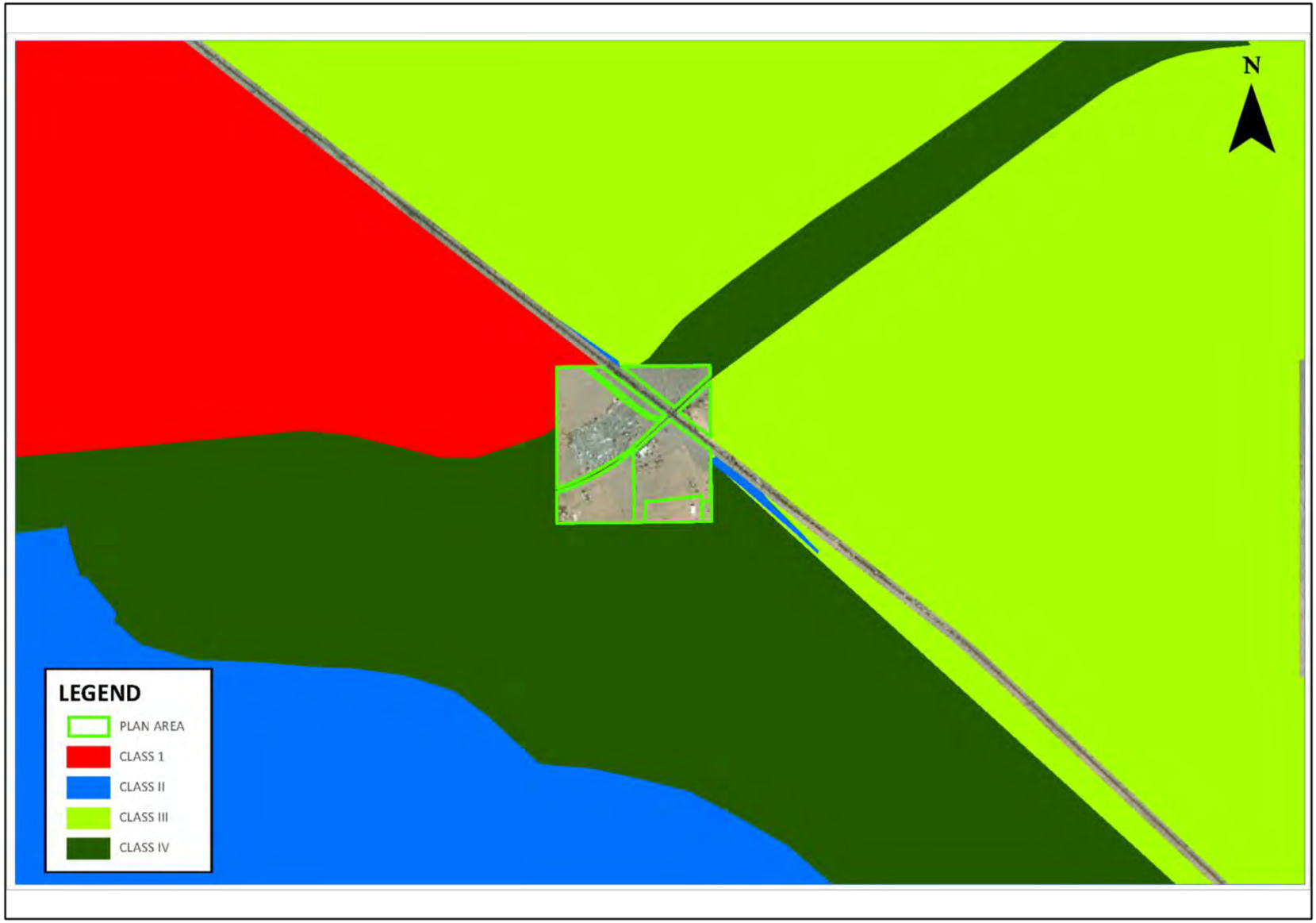
Local

General Plan

The GSPA is under the County of Imperial jurisdiction and subject to the County Development Code and conformance with the General Plan. The County General Plan does not specifically contain a visual element; however, it addresses related topics in the following General Plan Sections:

- Conservation and Open Space Element;
- Land Use Element; and
- Circulation & Scenic Highways Element.

In addition, the Renewable Energy and Transmission Element (Imperial County, 2015b) includes specific goals, policies and standards for renewable energy and specifically solar projects. **Table 5.1-1** provides an analysis of the project's consistency with the Land Use, Circulation & Scenic Highways, Conservation and Open Space and Renewable Energy & Transmission Element (Imperial County, 2008, 2015a, 2016).



SOURCE: Altum Group, 2020c.

VRI Classifications Surrounding Planning Area
Glamis Specific Plan
Figure 5.1-1

Scenic Highways

Per the List of Officially Designated County Scenic Highways from Caltrans, SR-78 is not a County designated scenic route (Caltrans, 2017).

Scenic Vistas

The nearest vista point, Inspiration Point, is approximately 103 miles west of the GSPA. There are no Caltrans designated vista points in the vicinity of the GSPA.

TABLE 5.1-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN AESTHETICS GOALS AND OBJECTIVES

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
LAND USE ELEMENT (LUE)		
Regional Vision		
Goal 3: Achieve balanced economic and residential growth while preserving the unique natural, scenic, and agricultural resources of Imperial County.	Yes	The proposed Specific Plan is located in eastern Imperial County in an area characterized by rolling sand dunes used for off highway vehicle activities. The GSPA is currently developed with a general store and RV storage area and does not contain any designated scenic features. Implementation of the proposed Specific Plan would not obstruct views of distant mountain ranges or degrade any scenic vistas as none are visible in the vicinity of the GSPA. The proposed Specific Plan is consistent with the OHV activities in this portion of the County. The GSPA is already disturbed and does not contain any agricultural resources. Therefore, the proposed Specific Plan is consistent with this Goal.
Objective 3.4 Protect/ improve the aesthetics of Imperial County and its communities.	Yes	Refer to the discussion above under Land Use Element Goal 3.
CIRCULATION AND SCENIC HIGHWAYS ELEMENT		
Scenic Highways		
Goal 4: The County shall make every effort to develop a circulation system that highlights and preserves the environmental and scenic amenities of the area.	Yes	The proposed Specific Plan accommodates a circulation system that highlights and preserves the environmental and scenic amenities of the area. Therefore, the proposed Specific Plan is consistent with this goal.
Objective 4.3: Protect areas of outstanding scenic beauty along any scenic highways and protect the aesthetics of those areas.	Yes	There are no officially designated State Scenic Highways in Imperial County. The nearest eligible State Scenic Highway segment is located 51 miles west of the GSPA along SR-78. The GSPA is not visible from this segment due to distance and natural topography. Refer also to discussion above under Land Use Element Goal 3.

TABLE 5.1-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN AESTHETICS GOALS AND OBJECTIVES

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
CONSERVATION AND OPEN SPACE ELEMENT		
Preservation of Visual Resources		
Goal 5: The aesthetic character of the region shall be protected and enhanced to provide a pleasing environment for residential, commercial, recreational, and tourist activity.	Yes	The proposed Specific Plan includes building setbacks from SR 78 which would preserve the view corridor. Large portions of the Planning area would be left open when special events are not occurring.
Objective 5.1: Encourage the conservation and enhancement of the natural beauty of the desert and mountain landscape.	Yes	The proposed Specific Plan includes building setbacks from SR 78 which would preserve the view corridor. Large portions of the Project site would be left open when special events are not occurring.
Policy: Develop a Scenic Highway program that identifies scenic high-ways for future state-designation and visual resource preservation.	Yes	The proposed Specific Plan would not impede the development of a Scenic Highway program.
Program: Work with property owners to preserve prominent ridgelines and scenic backdrops through open space agreements, contracts, or other appropriate instruments along designated scenic corridors.	Yes	The proposed Specific Plan would not alter existing views of the desert and mountains and therefore is consistent with this objective.
Renewable Energy and Transmission Element		
Goal 1 – Support the safe and orderly development of renewable energy while providing for the protection of environmental resources.	Yes	See discussion below regarding Objective 1.2.
Objective 1.2: Lessen impacts of site and design production facilities on agricultural, natural, and cultural resources.	Yes	Solar facilities that would be potentially developed as part of the proposed Specific Plan would be sited within the boundary of the Planning area and would not affect agricultural, natural, or cultural resources.
Goal 2 – Encourage development of electrical transmission lines along routes which minimize potential environmental effects.	Yes	See discussion below regarding Objective 2.1.
Objective 2.1: To the extent practicable, maximize utilization of IID's transmission capacity in existing easements or rights-of-way. Encourage the location of all major transmission lines within designated corridors, easements, and rights-of-way.	Yes	The proposed Specific Plan would interconnect with existing IID transmission lines using the SR 78 corridor as a ROW.

5.1.3. Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

Except as provided in Public Resources Code Section 21099, a project would be considered to have a significant impact if it 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 public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?
4. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Analysis

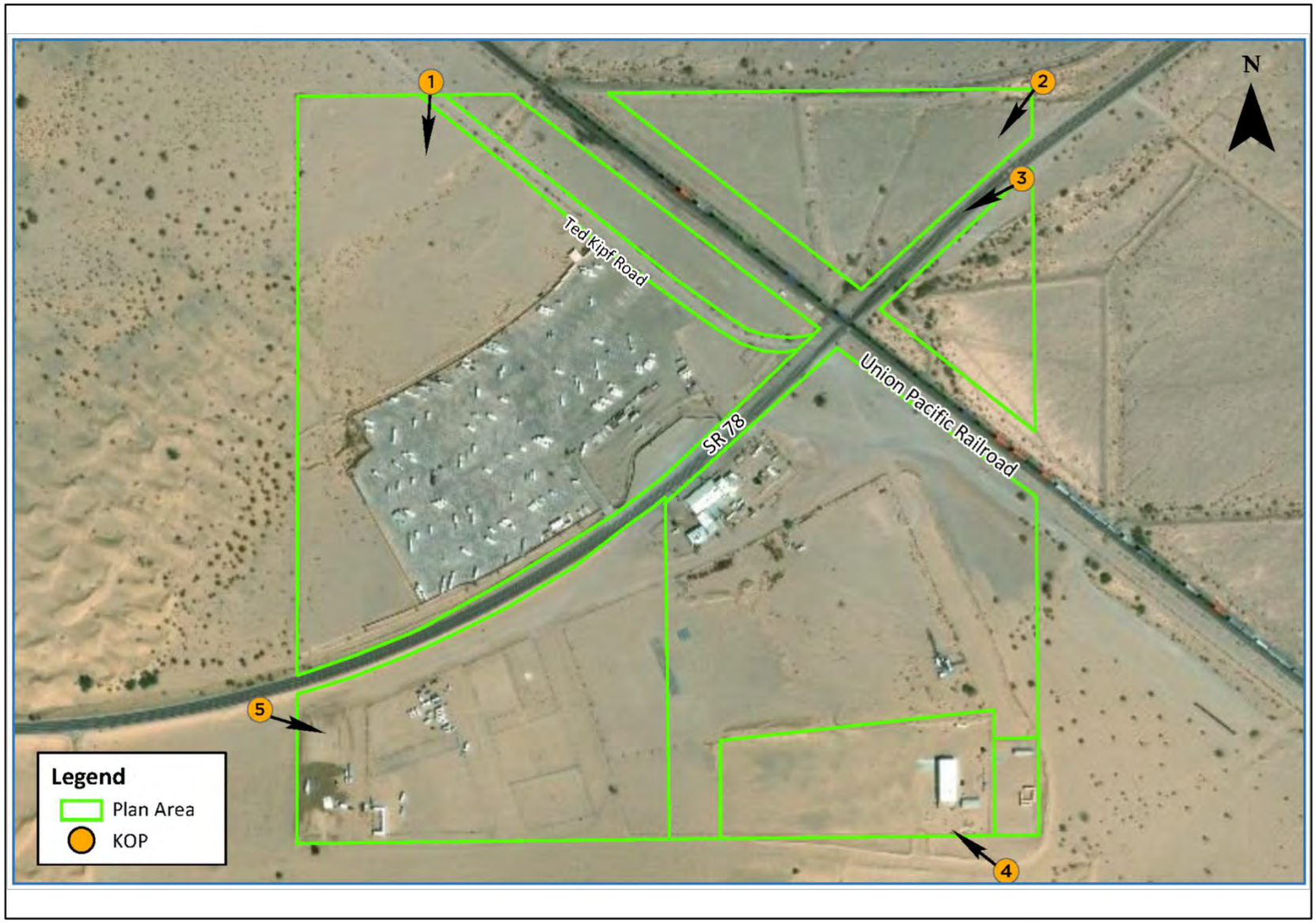
Principal Public Viewpoints Considered (Key Observation Points)

Five (5) Key Observation Points (KOPs) were selected to assess the potential level of visual change that could result from implementation of the Project. The locations of the five (5) KOPs are presented in Figure 5.1-2. The KOPs were selected to capture representative vantages from SR-78. Photos from each KOP are presented in Figure 5.1-3, Figure 5.1-4 and Figure 5.1-5.

Key Observation Point 1

KOP 1 is located on the northwest parcel of the GSPA directly above Ted Kipf Road. This KOP displays views oriented south toward the ISDRA (see Exhibit 7, KOP 1 in Appendix D) with the Project site contained in the middleground. The foreground in KOP 1 contains visual encroachments such as fencing. The middleground in KOP 1 contains a combination of open disturbed desert and the RV storage area. The spanning background provides views of the ISDRA. The scenic attractiveness of KOP 1 is typically based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 1 is moderate (Class III of the BLM's VRI) since the existing visual encroachment appear subordinate to the overall landscape. This KOP provides a typical view for a pedestrian, car, OHV or truck traveling on Ted Kipf Road, likely traveling at a low to medium speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the Project site is more or less unobstructed from view.



SOURCE: Altum Group, 2020c.

Location of Key Observation Points (KOPs)
Glamis Specific Plan
Figure 5.1-2

KOP 1 Facing South

KOP 2 Facing Southeast

SOURCE: Altum Group, 2020c.

KOPs 1 and 2
Glamis Specific Plan
Figure 5.1-3

KOP 3 Facing West

KOP 4 Facing Northwest

SOURCE: Altum Group, 2020c.

KOPs 3 and 4
Glamis Specific Plan
Figure 5.1-4

KOP 5 Facing Southwest

SOURCE: Altum Group, 2020c.

KOP 5
Glamis Specific Plan
Figure 5.1-5

Key Observation Point 2

KOP 2 is located on the westbound side of SR-78 on the right corner of the northeast parcel of the GSPA. This KOP displays views from the highway, oriented southeast (see Exhibit 8, KOP 2 in Appendix D) with the Project site in the middleground. The foreground and middleground in KOP 2, contains visual encroachments such as fencing, wireless communications facility, transmission lines, and the Glamis Beach Store. The scenic attractiveness of KOP 2 is typical based on its common scenic quality and few visual encroachments, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 2 is moderate (Class III of the BLM's VRI) since the existing visual encroachment including, fencing, wireless communications facility, transmissions lines, and Glamis Beach Store appear subordinate to the overall landscape. This KOP provides a typical view for a motorist traveling east on SR-78, likely traveling at a high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the GSPA is more or less unobstructed from view.

Key Observation Point 3

KOP 3 is located on the eastbound side of SR-78 just east of the GSPA. This KOP displays views from the highway, oriented west (see Exhibit 9, KOP 3 in Appendix D) with the Project site contained in the middleground. The foreground in KOP 3 contains visual encroachments such as fencing and highway signage. The middleground in KOP 3 contains a combination of open, disturbed desert, transmissions line, and the RV storage area. The scenic attractiveness of KOP 3 is typically based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 3 is moderate (Class III of the BLM's VRI) since the existing visual encroachment including signage, utility distribution lines, commercial facilities, and the UPRR appear subordinate to the overall landscape. This KOP provides a typical view for a motorist traveling west on SR-78, likely traveling at a high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the GSPA is more or less unobstructed from view.

Key Observation Point 4

KOP 4 is located on the southeast corner of the GSPA and depicts views from the ISDRA oriented northwest (see Exhibit 10, KOP 4 in Appendix D) with the GSPA contained in the middleground. The foreground in KOP 4 contains visual encroachments such as fencing and a private residence/storage building. The middleground in KOP 4 contains a combination of open, disturbed desert and the metal building structures representing the Glamis Beach Store. The ridgelines of the Chocolate Mountains are visible in the background to the north. The scenic attractiveness of KOP 4

is typical based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features. The scenic quality of KOP 4 is moderate (Class III of the BLM's VRI) since the existing visual encroachment including fencing and commercial uses appear subordinate to the overall landscape. This KOP provides a typical view for a pedestrian walking on or OHV traveling along the southern border of the GSPA. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the Project site is more or less unobstructed from view.

Key Observation Point 5

KOP 5 is located on the eastbound side of SR-78; just east of the GSPA and depicts views from the highway, oriented southwest (see Exhibit 11, KOP 5 in Appendix D). The foreground in KOP 5 contains visual encroachments such as wood posting for sectioned-off parking and vendor areas. The middleground in KOP 5 is mostly comprised of open, disturbed desert and a wireless communications tower. The Chocolate Mountains ridgeline is visible in the background to the north. The scenic attractiveness of KOP 5 is typical based on its common scenic quality and wood posting, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 5 is moderate (Class III of the BLM's VRI) since the existing visual encroachment including the wood posting and wireless communications tower. This KOP provides a typical view for a motorist traveling westbound on SR-78, likely traveling at a moderate to high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the GSPA is more or less unobstructed from view.

Impact 5.1-1: Would the project have a substantial adverse effect on a scenic vista?

A *Visual Impact Assessment* was prepared for the Specific Plan in March 2020 (Altum Group, 2020c, Appendix D). This assessment found that no designated scenic vistas as identified by the County are located within visible distance of the GSPA. Per the List of Officially Designated County Scenic Highways from Caltrans, the GSPA is not located along a County designated scenic route. The GSPA is located in a relatively flat area and does not have any rock outcroppings and contains very few trees. The GSPA, as viewed from multiple vantage points, is already developed with commercial and infrastructure uses. The southwest portion of the GSPA contains an existing RV Storage facility, directly northwest of the Glamis Beach Store. The SR-78 and the UPRR bisect each other, running northeast and northwest respectively. The GSPA is bordered by the ISDRA to the south, the NADW to the west, and BLM land to the north and east. Immediate surrounding views from the GSPA consist of the NADW to the northwest, and the CMAGR to the north and east.

The NADW is managed by the BLM as Visual Resource Management (VRM) Class I. VRM Class I objectives are to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. None of the activities associated with implementation of the proposed Specific Plan would occur on the NADW or on BLM lands, thus, the implementation of the proposed Specific Plan would not result in a substantial adverse effect on a scenic vista and a less than significant impact would occur. No mitigation would be required.

Impact 5.1-2: Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

According to the California Scenic Highway Mapping System (Caltrans, 2020), within Imperial County, a portion of SR-78, between the Anza Borrego State Park Road and SR-86 near Salton City, is eligible for designation as a state scenic highway. However, that portion of SR-78 within the GSPA and its immediate vicinity are not designated as a state scenic highway nor is it eligible for designation.

The GSPA is not located along a County designated scenic route. The GSPA does not contain any rock outcroppings and has very few trees. According to the *Class III Cultural Resources Inventory Report* prepared for the Proposed Project, the Glamis Beach Store is not considered a historical resource (ASM Affiliates, 2019). As such, implementation of the proposed Specific Plan is not anticipated to substantially damage scenic resources within a state scenic highway. Impacts would be less than significant. No mitigation would be required.

Impact 5.1-3: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

The GSPA is rural in character with a few visual encroachments, including existing commercial and residential structures, a wireless communications tower, and railroad infrastructure. It is located in an area that has been extensively used by OHVs due to the recreational nature of the ISDRA. The proposed Specific Plan's Conceptual Open Space and Recreational Plan provides for the inclusion of open space within Planning Areas 1, 2 and 3 to preserve their existing open space character. The proposed Specific Plan also recommends that new structures be sited to provide public views from SR-78, Ted Kipf Road and other publicly accessible vantage points. Implementation of the proposed Specific Plan is not anticipated to substantially degrade the existing visual character or quality of public views of the GSPA or its surroundings.

Add discussion of solar panels, battery storage, water treatment plant or other infrastructures projects. Including mitigation measures from County PEIR.

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

Impact 5.1-4: Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Implementation of the proposed Specific Plan is not expected to create a substantial new source of nighttime lighting or day-time glare and would provide external safety lighting for both normal and emergency conditions at the primary access points. All subsequent development, in addition to the Special Events, will be conditioned to provide the minimum illumination needed to achieve safety and security and to be downward facing and shielded in order to focus the illumination in the immediate area. Lighting of monument signs shall be arranged and installed as not to produce glare on other properties in the vicinity or upon the adjacent highway.

All lighting associated with implementation of the Specific Plan will be subject to County approval and compliance with Imperial County Requirements (Altum Group, 2020c). Therefore, implementation of the proposed Specific Plan would not result in the creation of a new sources of substantial light that would adversely affect day or nighttime views in the area. Lighting impacts would be less than significant and no mitigation would be required.

The proposed Specific Plan includes the potential development of solar arrays and solar generating facilities as a permitted use to provide onsite power to the Glamis area. Although there would be some level of potential reflectivity from the operation of solar panels, during the final design, solar panels would be selected that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands (Mitigation Measures [MM] AES-1). Nevertheless, future development of renewable ground-based solar energy generating facilities could have the potential to have an adverse effect regarding light or glare and result in a significant impact. MM AES-2 requires the preparation of a full glint/glare analysis prior to the issuance of building permits for ground-based solar generating facilities. The analyses will ensure that ground-based solar arrays would be designed to orient away from any known air travel routes for private, commercial, or military airplanes and avoid causing glare to users of SR-78. Therefore, with the implementation of MM-AES-1 and 2, implementation of the proposed Specific Plan is anticipated to result in less than significant glare impacts.

5.1.4. Mitigation Measures

AES-1: Selection of Appropriate Solar Panels
Future renewable energy facilities would be required to select solar panels that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands.

Timing/Implementation: *Prior to building permit issuance for ground-based solar generating facilities*

Enforcement/Monitoring: *County of Imperial Development Services*

AES-2: Glint and Glare Analysis for Solar Generating Facilities

Future renewable energy facilities would be required to consider siting and design features that would minimize glint and glare and take appropriate actions. These actions include identifying glint and glare effects, assessing and quantifying these effects to determine potential safety and visual impacts, having qualified people conduct such assessments and identifying mitigation measures to address significant impacts.

Methods to minimize night-sky effects include using minimum intensity lighting of an appropriate color consistent with safety needs, prohibiting strobe lighting except where it is required for safety; shielding all permanent lighting unless otherwise required for safety; mounting lighting so that light is focused downward; controlling lighting with timers, sensors, and dimmers; and using vehicle-mounted lights for nighttime maintenance work rather than permanently mounted lighting.

Timing/Implementation: *Prior to building permit issuance for ground-based solar generating facilities*

Enforcement/Monitoring: *County of Imperial Development Services*

Significance After Mitigation

Implementation of **MM-AES-1** and **-2** would reduce the effects of glint and glare from ground-based solar generating facilities to below a level of significance.

5.2 Air Quality

This section addresses potential direct and indirect air quality impacts to air quality from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the planning area, identifies applicable regulations, analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential air quality impacts was derived from the Glamis Specific Plan Area (GSPA) *Air Quality Assessment* prepared by LdN Consulting which is provided as Appendix C-1 this Draft EIR (LdN Consulting, 2020a).

Scoping Issues Addressed

- During the scoping period for the project, a public scoping meeting was conducted, and written comments were received from regulatory agencies. No comments related to air quality impacts were raised.

5.2.1. Environmental Setting

The GSPA is located in Imperial County, the southeastern most county in California in the Salton Sea Air Basin. The GSPA experiences mild and dry winters with daytime temperatures ranging from 65 to 75 ºF, extremely hot summers with daytime temperatures ranging from 104 to 115 ºF, and very little rain. Imperial County usually receives approximately three (3) inches of rain per year mostly occurring in late summer or midwinter. Summer weather patterns are dominated by intense heat induction low- pressure areas over the interior desert. The flat terrain of the Imperial Valley and the strong temperature differentials created by intense solar heating produce moderate winds and deep thermal convection. The general wind speeds in the GSPA are less than 10 miles per hour (mph), but occasionally experience winds speeds of greater than 30 mph during the months of April and May. Statistics reveal that prevailing winds blow from the northwest-northeast; a secondary trend of wind direction from the southeast is also evident (LdN Consulting, 2020a).

Table 5.2-1 shows the Basin attainment status for the national and state standards.

Currently, the Basin is in "non-attainment" status for ozone (O_3) and serious nonattainment for Respirable Particulate Matter (PM_{10}). As a result, the Imperial County Air Pollution Control District (ICAPCD) developed an Ambient Air Quality Plan (AAQP) to provide control measures to achieve attainment status. The AAQP was adopted in 1991. A new National Ambient Air Quality Standard (NAAQS) for O_3 was adopted by the U.S. Environmental Protection Agency (USEPA) in 1997 and required modified strategies to decrease higher O_3 concentrations. To guide non-attainment areas closer to NAAQS requirements an 8-hr O_3 Air Quality Management Plan (AQMP) was approved by ICAPCD in 2009 and was accepted by the USEPA in 2010.

TABLE 5.2-1. IMPERIAL COUNTY AIR BASIN ATTAINMENT STATUS BY POLLUTANT.

Pollutant	CAAQS	NAAQS
Ozone (O_3)	Nonattainment	Nonattainment - marginal
Carbon Monoxide (CO)	Attainment	Unclassified/ Attainment
Respirable Particulate Matter (PM_{10})	Nonattainment	Attainment
Fine Particulate Matter ($PM_{2.5}$)	Attainment	Moderate Nonattainment – partial*
Nitrogen Dioxide (NO_2)	Attainment	Unclassified/ Attainment
Lead (Pb)	Attainment	Unclassified / Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Sulfates	Attainment	No Federal Standards
Vinyl Chloride	Unclassified	No Federal Standards
Hydrogen Sulfide (H_2S)	Attainment	No Federal Standards
Visibility Reducing Particles	Unclassified	No Federal Standards

Note: * = Indicates only a portion of the county is included in the designated nonattainment area (NA
Source: LdN Consulting, 2020a.

The ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared periodic updates to the SIP. SIPs for controlling PM_{10}, O_3, and a reasonably available control technology SIP are in place for Imperial County and constitute the Air Quality Attainment Plan (AQAP) for Imperial County.

A SIP revision for revised rules under ICAPCD Regulation VIII for fugitive dust PM_{10} was reviewed by the USEPA and the final rule was signed on March 27, 2013, and published in the Federal Register (Federal Register 2013). The ICAPCD adopted the rules on October 16, 2012, to regulate PM_{10} emissions from sources of fugitive dust (e.g., unpaved roads and disturbed soils in open and agricultural areas). The California Air Resources Board (CARB) submitted these rules to the USEPA for approval on November 7, 2012; the USEPA proposed approval of these revisions to the ICAPCD portion of the California SIP on January 7, 2013.

Rules and regulations promulgated by the ICAPCD and in the SIP revision applicable to the proposed Glamis Specific Plan include the following:

- **ICAPCD Rule 207.C.1, New and Modified Stationary Source Review** (Best Available Control Technologies [BACT]), requires that any new or modified emissions unit that has a potential to emit 25 pounds per day or more of any nonattainment pollutant or its precursors, or 55 pounds per day of Hydrogen Sulfide (H_2S), must include BACT as a part of the project.
- ICAPCD Rule 400, Nuisances, forbids the emission of air contaminants or other materials that would cause a nuisance to the public, including non-agricultural related odors.

- **ICAPCD Rule 800 General Requirements for Control of Fine Particulate Matter** (PM_{10}), requires actions to prevent, reduce, or mitigate PM_{10} emissions from anthropogenic (man-made) PM_{10} sources generated within Imperial County.
- **ICAPCD Regulation VIII, Rule 801** (Construction and Earthmoving Activities) establishes a 20 percent opacity limit, requires the implementation of a dust management control plan for all nonresidential projects of 5 acres or more, and requires compliance with other portions of Regulation VIII regarding bulk materials (Rule 802), carry-out and track-out (Rule 803), and paved and unpaved roads (Rule 805). The rule exempts single-family homes and waives the 20 percent opacity limit in winds over 25 mph under certain conditions. To comply with this regulation, the applicant would implement Mitigation Measure (MM) AQ-1 which requires preparation of a Fugitive Dust Suppression Plan to minimize dust generated during construction and ground disturbing activities.
- **ICAPCD Rule 804 Open Areas**, requires actions to prevent, reduce or mitigate the amount of PM_{10})emissions generated from Open Areas. Open areas are defined as any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

On October 23, 2018, the ICAPCD Board of Directors approved the Imperial County 2018 Redesignation Request and Maintenance Plan for PM_{10}. During a December 13, 2018, Public Hearing, CARB approved the Imperial County 2018 Redesignation Request and Maintenance Plan for PM_{10}.

ICAPCD adopted the 2013 Fine Particulate Matter ($PM_{2.5}$) plan on December 2, 2014. The plan was transmitted to CARB on December 9, 2014. CARB reviewed and approved the plan on December 18, 2014, as a revision to the California SIP for Imperial County. The plan was submitted to the EPA on January 9, 2015, and is pending approval.

Any development with a potential to emit criteria pollutants below significance levels defined by the ICAPCD is referred to as 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, a project proponent is required to implement a set of feasible "standard" design measures (determined by the ICAPCD) to reduce the air quality impacts 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" design measures (as determined by the ICAPCD) in addition to the standard measures.

Criteria pollutants are measured continuously throughout Imperial County and the data is used to track ambient air quality patterns throughout the county. As mentioned earlier, this data is also used to determine attainment status when compared to the NAAQS and California Ambient Air Quality Standard (CAAQS). The ICAPCD is responsible for monitoring four sites which collect

meteorological and criteria pollutant data used by the district to assist with pollutant forecasting, data analysis and characterization of air pollutant transport. Also, a fifth monitoring location is located in the City of Calexico which is monitored by CARB. The monitoring station that is closest to the Planning area is the 9th Street monitoring station in El Centro, which is approximately 31 miles west of the GSPA. Table 5.2-2 provides the criteria pollutant levels monitored at the 9th Street Monitoring Station for 2016, 2017 and 2018, which is the most current data at the time of the Draft EIR's preparation (LdN Consulting, 2020a).

Based on a review of the ambient data, both O_3 and PM emissions exceed AAQS and therefore are in non-attainment status. The 8-hour O_3 non-attainment is considered "Moderate" Non-Attainment while the 24-Hour PM_{10} is considered "Serious" Non-Attainment. Therefore, to comply with the ICAPCDs SIP and AAQP, the proposed Specific Plan must implement Best Available Control Measure (BACM) and BACT as outlined in the standard design measures that all projects must implement.

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. There is a single-family residence (apartment) located within the GSPA, however, it is not occupied year-round. The next nearest receptors are located approximately 15 miles to the west.

Methodology

Air Quality impacts related to construction and daily operations were calculated using the latest CalEEMod 2016.3.2 air quality model, which was developed by BREEZE Software for South Coast Air Quality Management District (SCAQMD) in 2017. The construction module in CalEEMod is used to calculate the emissions associated with the construction of the Project and uses methodologies presented in the USEPA AP-42 document with emphasis on Chapter 11.9 (LdN Consulting, 2020a).

TABLE 5.2-2: AMBIENT AIR QUALITY DATA NEAR PLANNING AREA (2016, 2017, 2018)

Pollutant	Closest Recorded Ambient Monitoring Site	Averaging Time	CAAQS	NAAQS	2016	2017	2018
O_3 (ppm)	El Centro – 9th Street	1 Hour	0.09 ppm	No Standard	0.108	0.110	0.102
		8 Hour	0.070 ppm	0.070 ppm	0.082	0.092	0.090
PM_{10}		24 Hour	50 µg/m3	150 µg/m3	284.9	268.5	253.0

TABLE 5.2-2: AMBIENT AIR QUALITY DATA NEAR PLANNING AREA (2016, 2017, 2018)

Pollutant	Closest Recorded Ambient Monitoring Site	Averaging Time	CAAQS	NAAQS	2016	2017	2018
(µg/m3)		Annual Arithmetic Mean	20 µg/m3	No Standard	45.0	41.3	46.9
$PM_{2.5}$ (µg/m3)		24 Hour	No standard -	35 µg/m3	31.3	23.2	22.4
		Annual Arithmetic Mean	12 µg/m3	15 µg/m3	9.4	8.4	8.6
NO_2 (ppm)		Annual Arithmetic Mean	0.030 ppm	0.053 ppm	0.005	No Data	No Data
		1 Hour	0.18 ppm	0.100 ppm	0.042	0.040	0.032

Notes: ppm=Parts per Million µg/m^3 = micrograms per cubic meter
Source: LdN Consulting, 2020a

5.2.2. Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the Specific Plan.

Federal and State

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The USEPA is the federal agency designated to administer air quality regulation, while the CARB is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including O_3, carbon monoxide (CO), Nitrogen Dioxide (NO_2), Sulfur Dioxide (SO_2), PM_{10} and $PM_{2.5}$, and; lead (Pb). California has also set standards for sulfates, H_2S, vinyl chloride, and visibility reducing particles. Table 5.2-3 lists the current federal NAAQS and CAAQS for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

TABLE 5.2-3. SUMMARY OF FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS.

Pollutant	Averaging Time	Federal Primary Standards	California Standards
O_3	1-hour	----	0.09 ppm
	8-hour	0.070 µg/m^3	0.070 µg/m^3
PM_{10}	24-hour	150 µg/m^3	50 µg/m^3

TABLE 5.2-3. SUMMARY OF FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS.

Pollutant	Averaging Time	Federal Primary Standards	California Standards
	Annual	---	20 μg/m^3
$PM_{2.5}$	24-hour	35 μg/m^3	---
	Annual	12 μg/m^3	12 μg/m^3
CO	8-hour	9.0 ppm	9.0 ppm
	1-hour	35.0 ppm	0.030 ppm
	Annual	0.053 ppm	0.030 ppm
NO_2	1-hour	0.100 ppm	0.18 ppm
SO_2	24-hour	---	0.04 ppm
	3-hour	0.5 ppm (secondary)	---
	1-hour	0.075 ppm (secondary)	0.25 ppm
pb	30-day average	---	1.5 μg/m^3
	3-month average	0.15 μg/m^3	---

Notes:
ppm = parts per million
μg/m^3 = micrograms per cubic meter
Source: LdN Consulting, 2020a.

Local

Local control in air quality management is provided by the CARB through county-level or regional (multi-county) air pollution control districts (APCDs). The CARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The CARB has established 14 air basins statewide. The Planning area is located within the Salton Sea Air Basin (SSAB), which includes all of Imperial County and a portion of central Riverside County. Air quality conditions in the Imperial County portion of the SSAB are under the jurisdiction of the ICAPCD. The remainder of the Basin is managed by the SCAQMD. The ICAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment."

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

Table 5.2-4. The CEQA handbook further states that any proposed project with a potential to emit less than the Tier I thresholds during operations may potentially still have adverse impacts on the local air quality and would be required to develop an Initial Study (IS) to help the Lead Agency determine whether the project would have a less than significant impact. On the other hand, if the proposed project's operational development fits within the Tier II classification, it is considered to have a significant impact on regional and local air quality. Therefore, Tier II projects are required to implement all standard design measures as well as all feasible discretionary design measures.

TABLE 5.2-4: SCREENING THRESHOLD FOR CRITERIA POLLUTANTS

Construction Emissions		
Pollutant	**Total Emissions (Pounds per Day)**	
PM_{10} and $PM_{2.5}$	150	
Nitrogen Oxide (NOx)	100	
CO	550	
Reactive Organic Gases (ROG)	75	
Operational Emissions		
Pollutant	**Tier I (Pounds per Day)**	**Tier II (Pounds per Day)**
PM_{10} and Sulfur Oxide (SOx)	< 150	150 or greater
NOx and ROG	< 137	137 or greater
CO	< 550	550 or greater
Level of Significance:	Less Than Significant	Significant Impact
Level of Analysis:	Initial Study	Comprehensive Air Quality Analysis Report
Environmental Document:	Negative Declaration	Mitigated ND or EIR

Source: LdN Consulting, 2020a.

Additionally, ICAPCD defined standard design measures for construction equipment and fugitive PM_{10} must be implemented at all construction sites. The implementation of design measures, as listed in the ICAPCD CEQA handbook, apply to those construction sites which are 5 acres or more for non- residential developments such as the proposed Project. Additionally, in an effort to reduce PM_{10}or Fugitive Dust from ambient air, the Project would be required to develop a dust management plan consistent with Regulation VIII of ICAPCD's Rules and Regulations. Additionally, the project shall not exceed the 20 percent opacity threshold under Rule 801.

The Imperial County General Plan contains goals, objectives, policies and/or programs to conserve the natural environment of Imperial County, including air quality. Table 5.2-5 summarizes the Project's consistency with the applicable air quality goal and objectives from the General Plan.

TABLE 5.2-5 CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Land Use Element (LUE)		
Goal 9: Identify and preserve significant natural, cultural, and community character resources and the County's air and water quality. • Objective 9.6: Incorporate the strategies of the Imperial County AQAP in land use planning decisions and as amended.	Yes	The AQAP includes the rules and regulations promulgated by the ICAPCD that are applicable to land use projects in Imperial County. The proposed Project must comply with applicable ICAPCD rules and regulations, either through project design or inclusion of mitigation, to qualify for the necessary permits to implement construction and operation. Mitigation Measures (MM) AQ-1 and AQ-2 would ensure the proposed Project is consistent with the County's General Plan.
Objective 9.7: Implement a review procedure for land use planning and discretionary project review which includes the Imperial County Air Pollution Control District.	Yes	As the air pollution control district for the County, the ICAPCD must review all projects subject to environmental documentation. This review may entail the required inclusion of mitigation or other measures to reduce project emissions to levels acceptable per ICAPCD rules and regulations. The ICAPCD will review the proposed Project as part of the CEQA process.
Conservation and Open Space Element		
Goal 7: The County shall actively seek to improve and maintain the quality of air in the region. • **Objective 7.1:** Ensure that all projects and facilities comply with current Federal, State, and local requirements for attainment of air quality objectives. • **Objective 7.2:** Develop management strategies to mitigate fugitive dust. Cooperate with all Federal, State and local agencies in the effort to attain air quality objectives. • **Objective 7.4:** Enforce and monitor environmental mitigation measures relating to air quality. • **Objective 7.5:** Coordinate efforts with Imperial County Transportation Commission (ICTC) and other appropriate agencies to reduce fugitive dust from unpaved streets.	Yes	The proposed Specific Plan focuses on providing internal clearly marked signage for both passenger vehicles and Off Highway Vehicles (OHVs), including speed limits for dust control and lighted signage for nighttime circulation. Activities and development of the proposed Specific Plan will comply with the Mitigation Monitoring and Reporting Program in the Draft EIR for the proposed Specific Plan. Therefore, the proposed Specific Plan is consistent with this goal.
Protection of Air Quality and Addressing Climate Change Policy: Reduce PM_{10} and $PM_{2.5}$ emissions from unpaved roads, agricultural fields, and exposed Salton Sea lakebed.	Yes	The ICAPCD seeks to improve and maintain the quality of air in Imperial County through issuance of air quality management plans, rules, and regulations that reflect both state and federal requirements for meeting air quality objectives. The proposed Specific Plan must comply with the

TABLE 5.2-5 CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Programs: Implement all ICAPCD particulate matter (PM) emission controls including the Final PM_{10} 2009 State Implementation Plan and the 2013 State Implementation Plan for the 2006 24- Hour $PM_{2.5}$ Moderate Nonattainment Area.		requirements of these plans, rules, and regulations to gain approval from the County.
Circulation and Scenic Highways Element (CSHE)		
Objective 3.8: Attempt to reduce motor vehicle air pollution. Require all major projects to perform an air quality analysis to determine the amount of pollution, as well as the alternative reduction options.	Yes	An air quality analysis has been prepared for the proposed Specific Plan, which mobile source emissions.

Source: Imperial County, 2008, 2015, 2016.

5.2.3. Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

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

Analysis

Impact 5.2-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Emissions

The Project construction dates were estimated based on a "conservative development scenario" whereby all construction occurs over a three-year period with kickoff starting in 2022 and ending sometime in 2024. In reality construction could occur over a 20- to 50-year period. Therefore, the annual construction emissions could be substantially lower than those presented on Table 5.2-5 because they would be spread out over a 50-year period. CalEEMod 2016.3.2, the most current version of the model, was utilized for all construction calculations. It should be noted that standard

construction design measures that are in place at the time the specific developments are brought forward would be required for all future implementation activities. The current standard construction design measures are listed below:

1. Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
2. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
3. Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
4. Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

A summary of the construction emissions is shown below in Table 5.2-6. Given these findings, there would be no exceedances of the ICAPCD threshold for fugitive dust.

TABLE 5.2-6: EXPECTED CONSTRUCTION EMISSIONS SUMMARY (POUNDS PER DAY)

Year	ROG	NOx	CO	PM_{10} (Dust)	PM_{10} (Exhaust)	PM_{10} (Total)	$PM_{2.5}$ (Dust)	$PM_{2.5}$ (Exhaust)	$PM_{2.5}$ (Total)
2022 (lb. /day)	20.05	43.19	61.68	18.21	1.64	19.82	9.97	1.51	11.45
2023 (lb. /day)	19.42	35.24	57.78	7.61	0.83	8.44	2.07	0.78	2.85
2024 (lb. /day)	19.01	33.82	55.39	7.61	0.73	8.34	2.07	0.69	2.76
Significance Threshold (lb. /day)	75	100	550	-	-	150	-	-	150
ICAPCD Impact	No	No	No	-	-	No	-	-	No

Source: LdN Consulting, 2020a (Appendix C-1).

The emissions shown in Table 5.2-6 are mitigated to primarily control fugitive dust (PM_{10}) emissions during construction and assume exposed soil areas would be watered twice daily. To minimize fugitive dust and general construction emissions, the applicant would be required to implement fugitive dust control measures per ICAPCD Rules 801 and 804 which are included as Mitigation Measures (MM) AQ-1 and MM AQ-2.

Operational Emissions

Project Buildout is expected within 20 to 50 years however development within the planning area was modeled to include buildout in 2024. CalEEMod was also updated to reflect a net increase in average daily vehicle trips (ADT) during operation of 1,750 ADT. (LLG Engineers, 2019; Appendix L-1). trips would be expected to be heaviest Friday through Monday and would be operational from October through May. Modeling assumed the proposed Specific Plan scenario

shown in Table 5.2-7 below. Also, it should be noted that daily trips are generated from existing patrons within the Glamis area. The daily operational pollutants calculated within CalEEMod for both Summer and Winter scenarios is as typical of the model. These emissions are presented in Tables 5.2-8 and 5.2-9.

TABLE 5.2-7: OPERATIONAL USE SCENARIO

Land Use Type	Land Use Sub Type	Land Use Unit Amount
Commercial	Research & Development	10,000 SF
Industrial	Water/Wastewater Plants	1 Unit
Parking	Other Non-Asphalt Surfaces	25 acres
Recreational	Hotel	150 Rooms
Residential	Employee Housing	5 Units
Retail	Shopping or amenities	10,000 SF

Source: LdN Consulting, 2020a.

TABLE 5.2-8 DAILY OPERATIONAL EMISSIONS (SUMMER)

Emissions (lb./Day)	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source Emission Estimates	6.67	0.05	0.45	0.00	0.01	0.01
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Vehicle Emissions	4.59	25.89	40.49	0.11	5.48	1.50
TOTAL	**11.26**	**25.94**	**40.94**	**0.11**	**5.49**	**1.51**
ICAPCD Thresholds	55	55	550	150	150	150
Significant?	No	No	No	No	No	No

Note: Daily pollutant generation assumes trip distances within-CalEEMod 2016.3.2
Source: LdN Consulting, 2020a.

TABLE 5.2-9: DAILY OPERATIONAL EMISSIONS (WINTER)

Emissions (lb./Day)	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source Emission Estimates	6.67	0.05	0.45	0.00	0.01	0.01
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Vehicle Emissions	3.43	25.53	34.60	0.10	5.48	1.50
TOTAL	**10.11**	**25.57**	**35.05**	**0.10**	**5.49**	**1.51**
ICAPCD Thresholds	55	55	550	150	150	150
Significant?	No	No	No	No	No	No

Note: Daily pollutant generation assumes trip distances within-CalEEMod 2016.3.2
Source: LdN Consulting, 2020a.

Based upon these calculations, the proposed Project would not exceed ICAPCD operational air quality significance thresholds and would not be required to implement mitigation design measures to comply with CEQA and ICAPCD thresholds. Given this, a less than significant impact is expected. It should be noted that the Project would not be operational in the summer months though CalEEMod software provides these estimates. The inclusion of summer operational emissions data shows that if the Project did operate in the summer, operational emissions would be also less than significant.

Impact 5.2-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As discussed under Impact 5.2-1 implementation of the proposed Project would temporarily increase air pollutant emissions during construction of the individual implementation activities. The proposed Project is consistent with ICAPCD plans and would not exceed pollutant thresholds during operation. The Project's potential to result in a cumulatively considerable net increase of any criteria pollutant is considered less than significant with mitigation incorporated. With implementation of MM AQ-1 and MM AQ-2 impacts would be less than significant.

Impact 5.2-3: Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

There is one single family residence (apartment) within the GSPA. Given this, the project would not affect a substantial number of people with exposure to odors either short or long term from the proposed Specific Plan. Therefore, a less than significant odor impact is expected. It should be noted that the proposed Specific Plan would create a limited amount of seasonal employee housing. These units may be exposed to short term odors from construction activities, though, because they are short term, a less than significant odor impact would be expected.

Impact 5.2-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

There is one single family residence (apartment) within the GSPA. Given this, the project would not affect a substantial number of people with exposure to substantial pollutant concentrations either short or long term from the proposed Specific Plan. It should be noted that the proposed Specific Plan includes the development of on-site employee housing. These homes are accessory uses to the GSPA. These units may be exposed to short term odors from construction activities, though, because they are short term, a less than significant odor impact would be expected. As discussed above, neither the construction or operation emissions would exceed the ICAPCD thresholds with implementation of mitigation measures AQ-1 and AQ-2. Sensitive receptors would not be exposed to substantial pollutant concentrations, and impacts would be less than significant.

5.2.4. Mitigation Measures

The following MM would reduce impacts to below a level of significance.

MM AQ-1: Dust Control Plan

Prior to the issuance of a grading permit or building permit, the project applicant shall be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM_{10} emissions and associated mitigation measures during the construction and operational phases (see Rule 801 F.2) to ensure there would be no exceedances of the ICAPCD fugitive dust threshold. The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The 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:

- All disturbed areas, including bulk material storage that is not being actively used, 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 groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing particulate matter with 5 percent or greater silt content. For modeling purposes, it was assumed that watering would occur twice daily.
- All on-site unpaved roads segments or areas used for hauling materials shall be effectively stabilized. Visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering.
- The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.
- All track-out or carry-out on paved public roads, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, 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.

- 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 except where such material or activity is exempted from stabilization by the rules of ICAPCD.

Timing/Implementation: *Prior to building permit issuance for all construction.*

Enforcement/Monitoring: *ICAPCD*

MM AQ-2: NOx Emission Controls

Each project shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations at the time the proposals are brought forward. As of the date of publication of the Draft EIR, these measures include:

- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
- Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum.
- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).
- 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.
- Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts).

Timing/Implementation: *Prior to building permit issuance for ground-based solar generating facilities.*

Enforcement/Monitoring: *County of Imperial Development Services*

Level of Significance After Mitigation

Impacts would be less than significant after mitigation.

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5.3 Biological Resources

This section addresses potential direct and indirect environmental impacts to biological resources that may result from implementation of the proposed Specific Plan. The following discussion addresses the existing biological conditions within the Glamis Specific Plan Area (GSPA), the regulatory framework, analyzes the direct and indirect impacts to biological resources that could result from implementation of the proposed Specific Plan and provides mitigation measures to reduce these impacts. The regulatory framework discussion focuses on the federal, state, and local regulations that apply to sensitive plants, animals and their habitats. The affected environment discussion focuses on topography and soils; general vegetation; general wildlife; sensitive biological resources; riparian habitat and sensitive natural communities; jurisdictional waters; and habitat connectivity and wildlife corridors.

Information used in preparing this section and in the evaluation of potential impacts to biological resources was derived from a number of sources, including a *Biological Resources Assessment Report* prepared by Barrett Biological (Barrett Biological, 2020: Appendix E).

The purpose of the survey was to determine the inventory of biological resources; the possibility of the existence of endangered, threatened, sensitive or species of concern within the GSPA: map habitats, and ascertain the probability of the presence of sensitive species within the Project site. Pedestrian biological surveys of the approximately 141-acre GSPA and buffer zones, where possible, were conducted to develop an inventory of species (plant and animal) present at the time of the surveys, map vegetative communities, if present and ascertain the potential for occurrence of sensitive, endangered or threatened species within the GSPA and vicinity.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. The following issues related to biological and natural resources were raised by the California Department of Fish and Wildlife (CDFW) and are addressed in this section:

- Include an assessment of various habitat types located within the Project footprint, and a map that identifies the location of each.
- Include a general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project.
- Conduct a complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully

Protected Species. Species to be addressed should include all those which meet the CEQA definition.

- CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
- Conduct a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.
- Include information on the regional setting, with special emphasis on resources that are rare or unique to the region.
- Conduct a full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.
- The Draft EIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources and include the following:
- A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage.
- An evaluation of impacts to adjacent open space lands from construction, long-term operations and maintenance.
- A cumulative effects analysis developed as described under California Environmental Quality Act (CEQA) Guidelines section 15130. Please include all potential direct and indirect project-related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis.
- The Draft EIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible.
- The Draft EIR should assess all direct, indirect, and cumulative impacts that are expected to occur.
- Project activities described in the Draft EIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area.

- The Draft EIR should analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors.
- Lead Agency should include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
- CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. The Draft EIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
- California Species of Special Concern should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, include flat-tailed horned lizard, burrowing owl, Le Conte's thrasher, and Palm Springs pocket mouse.
- CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant and the Draft EIR should include mitigation measures for adverse Project-related impacts to local and regional ecosystems.
- Mitigation measures should emphasize avoidance and reduction of Project impacts.
- For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail.
- The Draft EIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the Draft EIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date.
- CDFW recommends that the Draft EIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project.

Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

- Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

- Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- Local onsite propagules from the Project area and nearby vicinity should be collected and used for restoration purposes. Onsite seed collection should be initiated in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

- Restoration objectives should include protecting special habitat elements or recreating them in areas affected by the Project.

- CDFW recommends that the Draft EIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur.

- Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project related noise (where applicable), sound walls, and buffers, where appropriate.

- The Draft EIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site.

- If pre-construction surveys are proposed in the Draft EIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

- CDFW recommends that the lead agency condition the Draft EIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-

disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities.

- Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise by injured or killed, and individuals should be moved only as far a necessary to ensure their safety. Temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
- CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.
- CDFW recommends that a California Endangered Species Act (CESA) Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" of State-listed CESA species, either through construction or over the life of the project.
- CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the Draft EIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.
- Based on review of material submitted with the Notice of Preparation and review of aerial photography the Project applicant will need to notify CDFW per Fish and Game Code Section 1602 prior to commencing any activity that may substantially divert or obstruct the natural flow of any river, stream or lake, or deposit debris, waste or other materials that could pass into any river, stream or lake.
- Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required.
- CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). If necessary, the Draft EIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study located in Appendix A-2, that the following environmental issue area resulted in "No

Impact" and was scoped out of requiring further review in this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding this issue.

- Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. The GSPA is not located within an area that is subject to a HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

5.3.1 Environmental Setting

The GSPA is located in the remote community of Glamis, an unincorporated area in Imperial County. The GSPA is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea. Figure 3-4 shows the relationship between the GSPA and surrounding vicinity with the Imperial Sand Dunes Recreation Area (ISDRA) located immediately to the southwest, the North Algodones Dunes Wilderness (NADW) immediately to the northwest, and the Chocolate Mountains and Chocolate Mountain Aerial Gunnery Range (CMAGR) located to the northeast.

Vegetation Communities

Vegetation within the Specific Plan area is sparse and consists of a combination of native and ruderal, primarily creosote bush-brittle bush scrub species (Table 5.3-1). No annuals were found on site. A majority of the Specific Plan area is bare ground or has been previously developed.

TABLE 5.3-1. VEGETATION OBSERVED WITHIN THE GSPA

Common name	Scientific name	Cal-IPC Rating*
White bursage	*Ambrosia dumosa*	None
Smoketree	*Dalea spinosa*	None
Palo verde	*Parkinsonia floridum*	None
Brittlebush	*Encelia farinosa*	None
Creosote	*Larrea tridentata*	None
Fanleaf crinklemat	*Tiquilia plicata*	None
Acacia	*Senegalia greggii*	None
Sahara mustard	*Brassica tournefortii*	Ca Noxious Weed Cal-IPC rating: High *
Saltcedar	*Tamarix sp.*	Ca Noxious Weed Cal-IPC rating: High *
Russian thistle	*Salsola tragus*	Ca Noxious Weed Cal-IPC rating: Limited*

Source: Barrett Biological, 2020.

*High – These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.

Limited – These species are invasive, but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

General Fauna

A variety of wildlife species were observed within the GSPA or have the potential to occur (Table 5.3-2). No mammals were observed within the GSPA, but signs of mammals were observed and were assumed to be coyotes, rabbits and kangaroo rats. Bat roosting sites are not available within the GSPA.

Bird species diversity varies with seasons, variety and quality of vegetative communities and both quail and mourning dove were observed. Reptiles utilize habitat dependent upon their dietary requirements. The diets of some retile species includes vegetation, while others consume insects. All require vegetation for shelter. Sparse vegetation is available on site. Lizard tracks were observed. Reliable moisture is a requirement for a portion of amphibian life cycle and no amphibians were observed within the GSPA. Due to the lack of available water, none would be expected. Ants and grasshoppers were observed. There are no permanent water sources observed within the GSPA; therefore, no fish would be expected. Biological resources found are listed in Table 5.3-3 and are their locations are shown on Figure 5.3-1.

TABLE 5.3-2. ANIMALS/INVERTEBRATES OBSERVED WITHIN THE GSPA

Common Name	Scientific Name
Quail	*Callipepla gambelii*
Mourning dove	*Zenaida macroura*
Ants	*various*
Grasshoppers	*various*
Lizard tracks	*various*
Kangaroo rat tracks	*Various*
Canine tracks	*various*
Jackrabbit	*Lepus californicus*

Source: Barrett Biological, 2020.

TABLE 5.3-3. BIOLOGICAL RESOURCES OBSERVED WITHIN THE GSPA

Location	Description	Recommendations
1. 32º59’55.7”/115º4’14.4”	Small burrows with tracks	Observe prior to construction activities to see if active
2. 32º59’53.4”/115º4’10.4”	2 avian nests	Observe prior to construction activities to see if active
3. 32º59’53.5”/115º4’10.2”	1 avian nest	Observe prior to construction activities to see if active
4. 32º59’53.2”/115º4’10.5”	Small burrows with tracks	Observe prior to construction activities to see if active
5. 32º59’33.7”/115º4’6.4”	Small burrows with tracks	Observe prior to construction activities to see if active

Source: Barrett Biological, 2020.

Sensitive Biological Resources

Sensitive Natural Communities

No sensitive natural communities were observed within the GSPA. Wetland or riparian habitat communities are considered sensitive by CDFW, these are discussed in more detail below (Barrett Biological, 2020).

Special Status Plant Species

No special status plant species were observed within the GSPA or have the potential to occur (Barrett Biological, 2020).

Special Status Animal Species

No special status animal species were observed within the GSPA, however, there are several that have the potential to occur (Table 5.3-4) (Barrett Biological, 2020).

Nesting Birds and Raptors

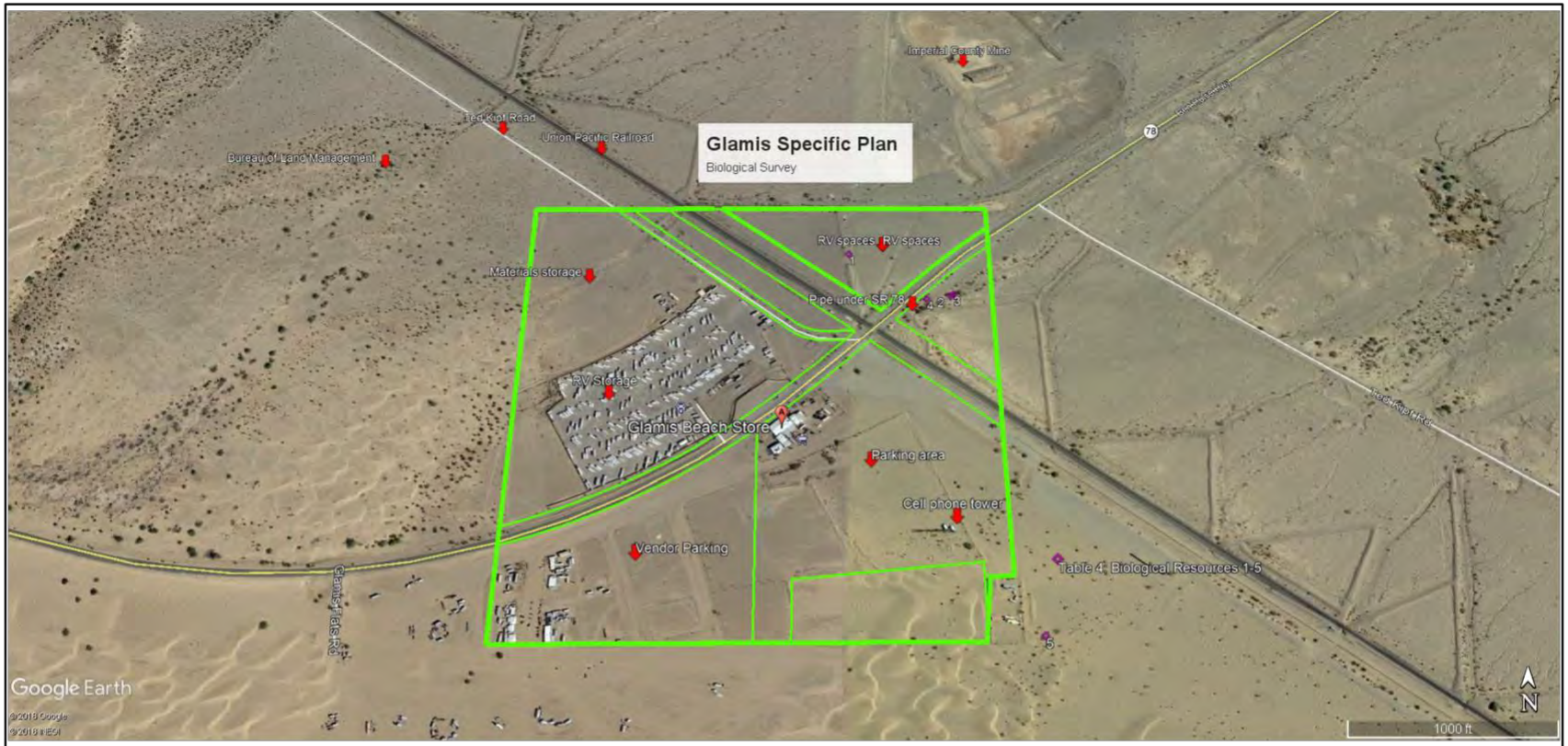
There are small trees on site that encourage bird nesting. Nests were observed in the palo verde (*Cercidium microphyllum*) and mesquite (*Prosopis sp*p) on site. Ground nesting species, such as lesser nighthawk, could use the area. No raptors were observed (Barrett Biological, 2020).

Jurisdictional Waters and Wetlands

Wetlands and other "waters of the United States" that are subject to Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act are under the jurisdiction of the U.S. Army Corp of Engineers (USACE). There are no wetlands found on site. A stormwater channel runs through a small portion of the northeast which is channeled under the railroad track. On the southeast portion, a wash is piped under SR 78. Several established washes and ephemeral washes were observed within Planning Areas 1 and 3.

Wildlife Corridors

The ability for wildlife to freely move about an area and not become isolated is considered connectivity and is important to allow dispersal of a species to maintain exchange genetic characteristics; forage (food and water) and escape from predation (Barrett Biological, 2020).



Location	Description	Recommendations
1. 32°59'55.7"/115°4'14.4"	Small burrows with tracks	Observe prior to construction activities to see if active
2. 32°59'53.4"/115°4'10.4"	2 avian nests	Observe prior to construction activities to see if active
Location	Description	Recommendations
3. 32°59'53.5"/115°4'10.2"	1 avian nest	Observe prior to construction activities to see if active
4. 32°59'53.2"/115°4'10.5"	Small burrows with tracks	Observe prior to construction activities to see if active
5. 32°59'33.7"/115°4'6.4"	Small burrows with tracks	Observe prior to construction activities to see if active

SOURCE: Barrett's Biological Surveys, 2019.

Biological Resources Map
Glamis Specific Plan
Figure 5.3-1

TABLE 5.3-4. SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR WITHIN THE GSPA

Special-Status Species	Status		Found	Potential for Occurrence
	Federal	State		
Flat-tailed horned lizard (FTHL) *Phrynosoma mcallii*	None	Protected, SCS	No	Medium - Highly disturbed acreage. Loose soils occur on site. - Ants were observed onsite. - No FTHL, scat or tracks were identified in the general biological survey. This area is not within a FTHL Management Area. - Two occurrence records were found on the California Natural Diversity Database (CNDDB); one 3.8 miles (1969); the other 5.78 miles (2002) from Planning area.
Colorado fringe toed lizard *Uma notata*	Threatened	Endangered	No	Very Low - Primarily found in wind-blown sand areas. Highly degraded acreage with no windblown sand areas. Habitat is present to the west.
Burrowing owl *Athene cunicularia*	None	CDFW: Species of Special Concern	No	Very Low - Highly disturbed acreage with sparse available burrow opportunities; limited prey observed.
Gila Woodpecker *Melanerpes uropygialis*	None	CDFW: Endangered	No	Very Low - Highly disturbed acreage with sparse available nesting opportunities; no palm trees.
Le Conte's thrasher *Toxostoma lecontei*		CDFW: Species of Special Concern	No	Very Low - Highly disturbed acreage with sparse available nesting opportunities; medium offsite.
Loggerhead shrike *Lanius ludovicianus*		CDFW: Species of Special Concern	No	Very Low - Highly disturbed acreage with sparse available nesting opportunities. Lizards which are prey were seen so loggerhead shrikes could - use area; medium offsite.

Source: Barrett Biological, 2020.
SCS = Species of Concern

5.3.2 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

Federal

Migratory Bird Treaty Act

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

Federal Water Pollution Control Act (Clean Water Act)

The Clean Water Act (CWA) provides a structure for regulating discharges into the waters of the U.S. The U.S. Environmental Protection Agency (USEPA) is given the authority to implement pollution control programs. Section 404 of the CWA regulates the discharge of dredged, excavated, or fill material in wetlands, streams, rivers, and other U.S. waters. The USACE is the federal agency authorized to issue 404 Permits for certain activities conducted in wetlands or other U.S. waters. Section 401 of the CWA grants each state the right to ensure that the State's interests are protected on any federally permitted activity occurring in or adjacent to Waters of the State. In California, the Regional Water Quality Control Boards (RWQCB) are the agency mandated to ensure protection of the State's waters. For a Preferred Action that requires an USACE CWA 404 permit and has the potential to impact Waters of the State, the RWQCB will regulate the project and associated activities through a Water Quality Certification determination.

State

California Endangered Species Act

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

California Fish and Game Code 3503.5

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

California Fish and Game Code 3513

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

California Fish and Game Code, Section 1602

Section 1602 of the California Fish and Game Code, as amended, requires an entity to notify CDFW regarding any proposed activity within a stream or river channel. This includes activities which may substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream or lake. CDFW may determine that the proposed activity will not substantially adversely affect an existing fish or wildlife resource. If not, the proposed activity may not be undertaken until the entity and CDFW enter into an agreement. The agreement would include reasonable measures necessary to protect the existing fish or wildlife resource.

Native Plant Protection Act

The Native Plant Protection Act (*California Fish and Game Code Section. 1900-1913)* (NPPA) prohibits the taking, possessing, or sale within the state of any plant listed by CDFG as rare, threatened, or endangered.

Local

County of Imperial General Plan

Relevant County of Imperial General Plan policies related to biological resources are provided below. Table 5.3-5 summarizes the project's consistency with the County's General Plan policies.

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

TABLE 5.3-5 CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL AND NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element (COSE)		
Goal 1: Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value. - **Objective 1.1**: Encourage uses and activities that are compatible with the	Yes	The proposed Specific Plan conserves environmental resources by avoiding, minimizing, and/or mitigating environmental impacts that may occur within the project site and will comply with the Mitigation Monitoring and Reporting Program (MMRP) included in this EIR.

TABLE 5.3-5 CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL AND NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
fragile desert environment and foster conservation. - **Objective 1.4**: Ensure the conservation and management of the County's natural and cultural resources.		
Goal 2: The County will integrate programmatic strategies for the conservation of critical habitats to manage their integrity, function, productivity, and long-term viability. - **Objective 2.1:** Designate critical habitats for Federally and State-listed species. - **Objective 2.2**: Develop management programs, including preservation of habitat for flat-tailed horned lizard, desert pupfish, and burrowing owl. - **Objective 2.3:** Support investigation of long-term climate change effects on biological resources. - **Objective 2.4:** Use the CEQA and NEPA process to identify, conserve and restore sensitive vegetation and wildlife resources. - **Objective 2.6:** Attempt to identify, reduce, and eliminate all forms of pollution; including air, noise, soil, and water.	Yes	The proposed Specific Plan integrates programmatic strategies in order to promote the conservation of critical habitats to manage their integrity, function, productivity and long-term viability. The NADW is located northwest of the GSPA which prompts the development of the proposed Specific Plan to incorporate avoidance and minimization measures to mitigate potential impacts to onsite and/or adjacent natural resources to the greatest extent. Restricted access to OHV travel is enforced by the fencing installation on the north-western boundary of the GSPA. Additionally, interspersed signage will be located throughout the GSPA. By incorporating such measures, the proposed Specific Plan remains consistent with this goal.
Biological Resource Conservation Policy: Provide a framework for the conservation and enhancement of natural and created open space which provides wildlife habitat values. **Program:** Projects within or in the vicinity of a Resource Area should be designed to minimize adverse impacts on the biological resources it was created to protect. **Program:** Protect riparian habitat and other types of wetlands from loss or modification by dedicating open space easements with adequate buffer zones, and by other means to avoid impacts from adjacent land uses. Road crossings or other disturbances of riparian habitat should be minimized and only allowed when alternatives have been considered and determined infeasible.	Yes	The Project site would not have an effect on the NADW. There is not riparian habitat or wetlands on site. The project has been designed to minimize impacts on biological resources. Mitigation measures have been identified that will reduce to below a level of significant all biological resource impacts that could not be avoided.

TABLE 5.3-5 CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL AND NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
Open Space and Recreation Conservation Policy: The County shall participate in conducting detailed investigations into the significance, location, extent, and condition of natural resources in the County. **Program:** Allow only compatible land uses and consistent zoning adjacent to protected areas. **Program:** Notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat.	Yes	A Biological Resources Assessment Report was prepared for the project. The CDFW has provided input on the project.
Water Element		
Protection of Surface Waters Policy: Preservation of riparian and ruderal habitats as important biological filters, and as breeding and foraging habitats for native and migratory birds and animals.	Yes	There is no riparian habitat or wetlands on site.
Coordinated Water Management Policy: Encourage and provide inter-agency and inter-jurisdictional coordination and cooperation for the management and wise use of water resources for contact and noncontact recreation, groundwater recharge, hydroelectric energy production, and wildlife habitat as well as for domestic and irrigation use.	Yes	There is no riparian habitat or wetlands on site. A Water Supply Assessment has been prepared and is included as Appendix K of the EIR..
Renewable Energy and Transmission Element		
Goal 1 – Support the safe and orderly development of renewable energy while providing for the protection of environmental resources. - **Objective 1.1:** The County of Imperial supports the overall goals of the Desert Renewable Energy Conservation Plan to provide a balance between the development of renewable energy resources while preserving sensitive environmental resources within its jurisdiction. - **Objective 1.2:** Lessen impacts of site and design production facilities on agricultural, natural, and cultural resources.	Yes	Any renewable energy/ solar project developed under the Specific Plan would contribute to the development of renewable energy resources.

TABLE 5.3-5 CONSISTENCY WITH THE GENERAL PLAN'S BIOLOGICAL AND NATURAL RESOURCE POLICIES

General Plan Policies	Consistency	Analysis
- **Objective 1.4:** Analyze potential impacts on agricultural, natural, and cultural resources, as appropriate. - **Objective 1.5**: Require appropriate mitigation and monitoring for environmental issues associated with developing renewable energy facilities. - **Objective 1.6:** Encourage the efficient use of water resources required in the operation of renewable energy generation facilities.		

Sources: County of Imperial General Plan 1997, 2015, 2016

5.3.3 Analysis of Project Effects and Significance Determination

Methodology

Direct impacts are considered to be those that involve the loss, modification or disturbance of natural habitats (i.e., vegetation or plant communities), which, in turn, directly affect plant and wildlife species dependent on that habitat. Direct impacts also include the destruction of individual plants or wildlife, which is typically the case in species of no or low mobility (i.e., plants, amphibians, reptiles, and small mammals). The collective loss of individuals in these manners may also directly affect regional population numbers of a species or result in the physical isolation of populations thereby reducing genetic diversity and, hence, population stability.

Indirect impacts are considered to be those that involve the effects of increases in ambient levels of sensory stimuli (e.g., noise, light), unnatural predators (e.g., domestic cats and other non-native animals), and competitors (e.g., exotic plants, non-native animals). Indirect impacts may be associated with the construction and/or eventual habitation/operation of a project; therefore, these impacts may be both short-term and long-term in their duration. These impacts are commonly referred to as "edge effects" and may result in changes in the behavioral patterns of wildlife and reduced wildlife diversity and abundance in habitats adjacent to project sites. Such impacts include increased pollutant discharges to receiving water bodies such as wetlands or marine environments, harassment by humans and/or their pets, light and glare, or increased ambient noise levels.

The determination of impacts in this analysis is based on both the features of the proposed Specific Plan and the biological values of the habitat and/or sensitivity of plant and wildlife species potentially affected. The Goals and Objectives of the proposed Specific Plan that avoid, preserve, or restore biological resources are taken into consideration and specifically described below prior to the assessment of potential adverse impacts.

Those direct and indirect impacts determined to be less than significant included impacts to biological resources that are relatively common or exist in a degraded or disturbed state, rendering them less valuable as habitat, or impacts that do not meet or exceed the significance thresholds defined below. Those impacts determined to be significant are those that do meet the thresholds of significance defined below. Conclusions are based on both the features of the proposed Specific Plan and the biological values of the habitat and/or sensitivity of plant and wildlife species to be affected. Specific considerations included the overall size of habitats to be affected, the GSPA's previous land uses and disturbance history, the GSPA's surrounding environment and regional context, the GSPA's biological diversity and abundance, the presence of special status plant and wildlife species, the GSPA's importance to regional populations of these species, and the degree to which habitats within the GSPA are limited or restricted in distribution on a regional basis and, therefore, are considered special-status in themselves.

Guidelines for Determination of Significance

Except as provided in Public Resources Code (PRC) Section 21099, the proposed Specific Plan would be considered to have a significant impact if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Analysis

Impact 5.3-1:	**Would the Project have a substantial effect on candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS?**

Construction of projects approved under the proposed Specific Plan have the potential to adversely affect candidate, sensitive, or special status species including flat-tailed horned lizard (FTHL)

(Barrett Biological, 2020). FTHL could potentially occur within the softer sands (within and around the washes, and along the roadsides) in the creosote bush scrub on-site. There is an abundance of prey (ants) that could support FTHL presence. There is potential that there would be direct and/or indirect impacts to this species if construction occurs during the active period of mid-February to mid-November. Ground disturbance from heavy equipment, which may potentially impact the FTHL, would be considered significant. Overall, with implementation of mitigation measure (MM) BIO-1 discussed below, the proposed Specific Plan's minor direct impacts on sensitive habitat are not expected to result in significant effects on sensitive species.

Impact 5.3-2: Would the Project have a substantial adverse effect on riparian habitat or other sensitive natural community?

There is no riparian habitat or other sensitive natural community found with the GSPA, therefore, the construction of projects under the proposed Specific Plan would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

Impact 5.3-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

A stormwater channel runs through a small northeast portion of Planning Area 3 which is channeled under the railroad track. On the southeast portion of Planning Area 1, a wash is piped under SR-78. Several established washes and ephemeral washes were observed on site and there would be significant impacts if construction occurs where they are located. It is recommended that the ACOE and CDFW be consulted to determine permitting requirements (Barrett Biological, 2020). There are no wetlands found within the GSPA; therefore, this project will have no impact on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Mitigation measure MM BIO-2 will mitigate permanent impacts to established washes and ephemeral washes within Planning Area 3 and Planning Area 1.

Impact 5.3-4: Substantially interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The proposed Specific Plan is in a predominately developed and fenced community. The GSPA is bisected on by SR-78, Ted Kipf Road and Union Pacific railroad and as a result of these existing barriers, the projects will not interfere substantially with the currently restricted movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Thus, the impact would be less than significant. MM BIO-3 will mitigate impacts to nesting birds within Planning Area.

Impact 5.3-5: Conflict with local policies or ordinances protecting biological resources?

The Imperial County General Plan Open Space and Conservation Element (Imperial County, 2016) contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. As noted above, implementation of the proposed Specific Plan has the potential to result in significant impacts to candidate, sensitive, or special status species, and washes and ephemeral streams. Such impacts could conflict with Open Space and Conservation Element and are considered potentially significant. Implementation of MM-BIO-1 and BIO-2 would reduce these impacts to below a level of significance.

5.3.4 Mitigation Measures

The following Mitigation Measures would reduce impacts to below a level of significance.

MM BIO-1: Mitigation of Impacts to flat-tailed horned lizards and their habitat

Prior to construction of each Specific Plan activity, a Capture/Relocation Plan for flat-tailed horned lizard shall be prepared by a qualified biologist. The plan shall include preconstruction survey and monitoring methods, capture and relocation methods, and suitable relocation areas. The Capture/Relocation Plan may include additional protection measures during construction including:

- Creating areas of land or small paths/culverts between project facilities for wildlife movement,
- Installing silt fencing around work areas to prevent migration of adjacent wildlife into impact areas,
- Installing pitfall traps in spring/summer/fall to trap any individuals that remain on the site for removal from work areas), and/or
- biological monitoring during construction to inspect fencing and pitfall traps and relocate wildlife species out of harm's way, if required.

The Capture/Relocation Plan shall be submitted to an approved by CDFW and the County of Imperial (or an agency delegated to oversee this program).

Timing/Implementation: *Prior to the commence of construction for each Specific Plan activity.*

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

MM BIO-2: Mitigation of Impacts to Jurisdictional Waters

- A jurisdictional delineation survey shall be performed to determine potential jurisdictional resources under Section 404/401 of the CWA Section 1600-1616 of the California Fish and Game Code, and the Porter-Cologne Water Quality Control Act for any activities that may substantially divert or obstruct the natural flow of or deposit debris, waste or other materials into any river, stream or lake.

- Current USACE delineation procedures and guidance consistent with "A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States" (Lichvar and McColley, 2008) should be used to identify and delineate any wetlands or waters of the U.S. (WoUS) or both that may be subject to USACE and RWQCB jurisdiction (Lichvar et al. 2016; USACE 1987, 2008). Likewise, current CDFW procedures and guidance shall be used to identify and delineate any streambeds, rivers, or associated riparian habitat potentially subject to CDFW jurisdiction (California Fish and Game Code, 2019).

- Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or and restoration at a minimum of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan (HRP), which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies and County of Imperial. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration.

- Temporarily impacted drainage features shall be recontoured to preconstruction conditions. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly.

- A biological monitor shall be present prior to initiation of ground disturbing activities to demark limit of disturbance boundaries. Flagging and/or staking

will be used to clearly define the work area boundaries and avoid impacts to adjacent drainage features.

- Erosion protection and sediment control best management practices (BMPs) shall be implemented in compliance with the General Construction General Permit and the Stormwater Pollution Prevention Plan (SWPPP).
- Graded areas would be stabilized to promote infiltration and reduce run-off potential.
- Any excess soil would be spread on site outside of jurisdictional drainages.

Timing/Implementation:	*Prior to building permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM BIO-3: Nesting Bird Surveys

If activities associated with vegetation removal, construction, or grading are planned during the bird nesting/breeding season (generally February 1 through August 31; January 1 for raptors), a qualified biologist shall conduct pre-construction surveys for active nests in all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures, at the appropriate time of day/night, and during appropriate weather conditions. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior (e.g., copulation, carrying of food or nest materials, nest building, flushing suddenly from atypically close range, agitation, aggressive interactions, or other behaviors). Preconstruction nesting bird surveys should be conducted weekly beginning 14 days prior to initiation of ground-disturbing activities, with the last survey conducted no more than three (3) days prior to the start of clearance/construction work. If ground-disturbing activities are delayed, additional preconstruction surveys should be conducted so that no more than 3 days have elapsed between the survey and ground-disturbing activities.

If active nests are identified, the biologist shall establish suitable buffers around the nest and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. The buffer should generally be a minimum of 300 feet for reports and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species.

Timing/Implementation: *Prior to construction.*

Enforcement/Monitoring: *CDFW*

Level of Significance After Mitigation

Upon implementation of the above mitigation measures all significant impacts would be reduced to a level of less than significant.

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5.4 CULTURAL RESOURCES

This section addresses potential direct and indirect environmental impacts to cultural resources that would result from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the vicinity of the Glamis Specific Plan Area (GSPA), identifies applicable regulations, analyzes direct and indirect environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable. Please see Section 5.16 for a discussion of project-related impacts to Tribal Cultural Resources.

The analysis in this section is based on the *Class III Cultural Resources Inventory Report* prepared by ASM Affiliates (ASM Affiliates, 2019). The Class III Cultural Resources Inventory Report included as Appendix F-1.

Cultural resources encompass archaeological, traditional, and built environmental resources, including buildings, structures, objects, districts, and sites. For purposes of the analysis of cultural resources under the California Environmental Quality Act (CEQA), the area of direct impacts to cultural resources is identified herein as the "Area of Potential Effect (APE)."

A total of approximately 141 acres was subject to 100 percent intensive Class III survey. Prior to the survey, a cultural resources records search was completed at the South Coastal Information Center (SCIC) of the Project APE. In all, seven cultural resources were identified within the Project APE. Three of these were discovered during the survey while the remaining four were previously recorded. A single isolated prehistoric artifact was identified within a disturbed context, while historic cultural resources include refuse deposits, roads, a railroad, and a cemetery.

Scoping Issues Addressed

During the scoping period for the Project, a scoping meeting was conducted, and written comments were received from regulatory agencies. The following issue related to Cultural Resources and were raised by the Native American Heritage Commission (NAHC) and are addressed in this section:

- Assembly Bill (AB) 52 applies to any project for which a Notice of Preparation (NOP), a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.
- NAHC recommends that lead agencies consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project.
- Both Senate Bill (SB) 18 and AB 52 have tribal consultation requirements.
- NAHC provided recommendations for Cultural Resource Assessments.

5.4.1. Environmental Setting

Ethnography and Archaeology

The GSPA was utilized prehistorically by a variety of Native American groups, including the Desert Cahuilla, the Quechan, the Halchidhoma, and the Kamia. These groups are discussed in more detail in the Class III Cultural Resources Technical Report (ASM Affiliates, 2019) which is included as Appendix F-1.

Cultural Periods and Patterns

Six successive periods, each with distinctive cultural patterns, may be defined for the Colorado Desert, extending back in time over a period of more than 12,000 years. They include: (1) Early Man (Malpais); (2) Paleoindian (San Dieguito); (3) Archaic (Pinto and Amargosa); (4) Late Prehistoric (Patayan); (5) Ethnohistoric Native American occupation; and (6) Historic Euro-American occupation. These periods are discussed in more detail in the Class III Cultural Resources Technical Report (ASM Affiliates, 2019) which is included as Appendix F-1.

5.4.2. Regulatory Setting

Cultural resources may be subject to federal, state, and local laws, policies, and regulations that are developed to ensure that adequate consideration is given to mitigating impacts to historical resources. The Project is subject to the following regulations, plans, goals, and policies.

Federal

National Historic Preservation Act

Federal regulations (36 Code of Federal Regulations [CFR] Part 800.2) define historic properties as "any prehistoric or historic district, site, building, structure, or object included, or eligible for inclusion in, in the National Register of Historic Places." Section 106 of the National Historic Preservation Act (NHPA) (Public Law 89-665; 80 Stat 915; U.S. Code [USC] 470, as amended) requires a federal agency with jurisdiction over a project to take into account the effect of the project on properties included in or eligible for listing on the National Register of Historic Places (NRHP), and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The term "cultural resource" is used to denote a historic or prehistoric district, site, building, structure, or object, regardless of whether it is eligible for the NRHP.

Native American Graves Protection and Repatriation Act (1990); Title 25, United States Code Section 3001, et seq.

The statute defines “cultural items,” “sacred objects,” and “objects of cultural patrimony;” establishes an ownership hierarchy; provides for review; allows excavation of human remains but

stipulates return of the remains according to ownership; sets penalties; calls for inventories; and provides for the return of specified cultural items.

State

California Register of Historic Places

Under the provisions of CEQA, including the CEQA Statutes (Public Resources Code [PRC] §§ 21083.2 and 21084.1), the CEQA Guidelines (Title 14 California Code of Regulations [CCR], § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for CRHR eligibility (PRC § 5024.1).

The purpose of the California Register of Historical Resources (CRHR) is to maintain listings of the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term historical resources include a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CCR § 15064.5[a]). The criteria for listing properties in the CRHR were expressly developed in accordance with previously established criteria developed for listing in the NRHP. The California Office of Historic Preservation regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation.

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing on the CRHR. The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

Criterion 2: is associated with the lives of persons important in our past;

Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:

> An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a "unique archaeological resource" under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, "A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" (PRC § 21083.2[h]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

Assembly Bill 52

California Assembly Bill 52 of 2014 (AB 52) was enacted on July 1, 2015, and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources:

1. "Sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" and meets either of the following criteria: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

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

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18

Senate Bill 18 (SB 18) of 2004 (California Government Code §65352.3) requires local governments to contact, refer plans to and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Native American Historic Resource Protection Act

PRC Sections 5097 et seq. codify the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

"No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres."

California Health and Safety Code

California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines

that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

Local

Imperial County General Plan

The County of Imperial General Plan (General Plan) provides goals, objectives, and policies for the identification and protection of significant cultural resources (Table 5.4-1). Specifically, the Conservation and Open Space Element of the General Plan calls for the protection of cultural resources and scientific sites and contains requirements for cultural resources that involve the identification and documentation of significant historic and prehistoric resources and the preservation of representative and worthy examples. The Conservation and Open Space Element also recognizes the value of historic and prehistoric resources and the need to assess current and proposed land uses for impacts upon these resources.

TABLE 5.4-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN TRIBAL CULTURAL RESOURCES GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element		
Conservation of Environmental Resources for Future Generations, Goal 1: - Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value	Yes, with mitigation	The proposed Specific Plan conserves environmental resources by avoiding, minimizing, and/or mitigating environmental impacts that may occur within the planning area and will comply with the Mitigation Monitoring and Reporting Program (MMRP) included in the Final EIR prepared for the proposed Specific Plan.
Conservation of Environmental Resources for Future Generations, Goal 1: - Objective 1.4: Ensure the conservation and management of the County's natural and cultural resources.	Yes, with mitigation	The proposed Specific Plan conserves environmental resources by avoiding, minimizing, and/or mitigating environmental impacts that may occur within the Project site and will comply with the MMRP included in the Final EIR prepared for the proposed Specific Plan.
Preservation of Cultural Resources, Goal 3: **Objective 3.1:** Protect and preserve sites of archaeological, ecological, historical, and scientific value, and/or cultural significance. **Objective 3.3:** Engage all local Native American Tribes in the protection of tribal cultural resources, including prehistoric trails and burial sites.	Yes, with mitigation	The proposed Specific Plan preserves the spiritual and cultural heritage of the diverse communities of Imperial County by preserving the Glamis Beach Store, existing historical cemetery and avoiding impacts to the Union Pacific Railroad (UPRR). The proposed Specific Plan preserves such resources by avoiding, minimizing, and/or mitigating impacts to such resources and will comply with the MMRP

TABLE 5.4-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN TRIBAL CULTURAL RESOURCES GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
		included in the Final EIR for the proposed Specific Plan.
Cultural Resources Conservation Policy: - Identify and document significant historic and prehistoric resources, and provide for the preservation of representative and worthy examples; and recognize the value of historic and prehistoric resources, and assess current and proposed land uses for impacts upon these resources.	Yes, with mitigation	A Cultural Resources Assessment has been conducted for the proposed Specific Plan.
Cultural Resources Conservation Program: - The County will use the CEQA process to conserve cultural resources and conform to Senate Bill 18 "Consultation with Tribal Governments" and Assembly Bill 52 "Consultation with Tribal Governments". Public awareness of cultural heritage will be stressed. All information and artifacts recovered in this process will be stored in an appropriate institution and made available for public exhibit and scientific review.	Yes, with mitigation	Cultural resources investigations have been conducted for the proposed Specific Plan. The County's compliance with the requirements of SB 18 and AB 52 are documents in Section 5.11, Tribal Cultural Resources.
Renewable Energy and Transmission Element		
Goal 1 – Support the safe and orderly development of renewable energy while providing for the protection of environmental resources. - Objective 1.2: Lessen impacts of site and design production facilities on agricultural, natural, and cultural resources. - Objective 1.4: Analyze potential impacts on agricultural, natural, and cultural resources, as appropriate.	Yes	The effects of development of energy or wind energy projects would be analyzed in this Draft EIR.

Source: County of Imperial, 2015, 2016.

Study Methods and Findings

Records Search

A records-search and literature review was conducted in June 2019 at the SCIC at San Diego State University, which covered 100 percent of the current GSPA APE. The records search covered a 0.5-mile buffer around the GSPA APE. The records search identified five previously recorded cultural resources within the 0.5-mile buffer, and four previously recorded cultural resources within the GSPA APE.

Pedestrian Field Survey

For the current Class III intensive inventory, standard transect spacing was 5 meters, although spacing was reduced significantly within identified archaeological sites to adequately define the site character. The systematic 5-meter transects were interrupted to do judgmental inspections of locations such as potential artifact scatters within the APE. The survey transects generally began at the outer edge of the APE and followed its orientation, working inward, to maintain survey efficiency.

Within areas with a low potential for cultural resources due to development or other disturbances, were addressed by a mixed strategy survey. This focused more on areas of less ground disturbance and closer inspection of historic to modern features. Areas covered by standard systematic 20-meter transects and those covered using a mixed strategy were distinguished on project maps. The interiors of fenced, private businesses were not surveyed.

One new prehistoric resource was recorded and three previously recorded resources within the APE were updated, confirming or correcting information on their locations, spatial extent, general characteristics, and likely eligibility status.

Summary of Findings

Seven cultural resources were identified within the GSPA APE (Table 5.4-2 below). Three of these were discovered during the pedestrian field survey while the remaining four were previously recorded. A single isolated prehistoric artifact was identified, which consisted of a single pied of red-brown chert[1], while historic cultural resources included refuse deposits, roads, a railroad, and a cemetery. All resources were assessed for their potential for CRHR listing based on surface inventory data. ASM assessed two cultural resources as potentially eligible for listing on the CRHR, the historic-era Glamis Cemetery and Union Pacific Railroad (UPRR).

The Union Pacific Railroad (IMP-3424) had previously been recommended as eligible for the National Register of Historic Places (NRHP) listing under Criterion A. The Glamis Cemetery (IMP-

[1] A fine-grained sedimentary rock composed of quartz.

4621) is recommended here as eligible for CRHR listing under Criterion 1. All other sites were assessed as likely ineligible because they could not be associated with significant events or persons. Likewise, they do not embody distinctive characteristics of a period, type of engineering, method of construction, or represent the work of a master. These remaining sites lack research potential to yield further information about the region's history or prehistory.

TABLE 5.4-2. CULTURAL RESOURCES IDENTIFIED IN THE CLASS III INVENTORY

Site	Survey	New or Existing	Age	Site Type	Potential Eligibility
Class 3 Eligible Sites					
IMP-3424	Class 3	Record Search	Historic	Railroad	Recommended Eligible
IMP-4621	Class 3	Record Search	Historic	Cemetery	Recommended Eligible
Class 3 Ineligible Sites and Sites with Uncertain Eligibility					
IMP-8214	Class 3	Record Search	Historic	Refuse Scatter	Likely Ineligible
IMP-8634	Class 3	Record Search	Historic	Railroad Depot	Likely Ineligible
GSP-KM-S-1	Class 3	New	Historic	Road	Likely Ineligible
GSP-KM-S-2	Class 3	New	Historic	Highway	Likely Ineligible
GSP-TRT-1-1	Class 3	New	Prehistoric	Artifact Isolate	Likely Ineligible

Source: ASM Affiliates, 2019.

5.4.3. Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

This section presents the significance criteria used for considering project impacts related to cultural resources, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

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

1. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?
3. Disturb any human remains, including those interred outside of formal cemeteries?

Impact 5.4-1: Would the Project result in a change in the significance of an historical resource?

To be considered historically significant, a resource must meet one of four criteria for listing outlined in the CRHR (CEQA Guidelines 15064.3 (a)(3)). In addition to meeting one of the criteria outlined the CRHR, a resource must retain enough intact and undisturbed deposits to make a meaningful data contribution to regional research issues (CCR Title 14, Chapter 1.5 Section 4852 [c]). Further, based

on CEQA Guidelines Section 15064.5 (b), substantial adverse change would include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is materially impaired. This can occur when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR, NRHP, a local register, or historic resources.
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its identification in an historical resources survey meeting the requirements of PRC §5024.1(g), unless the public agency establishes by a preponderance of the evidence that the resource is not historically or culturally significant.

Ground disturbing activities during construction of the proposed Specific Plan facilities and improvements have the potential to cause substantial adverse changes to resources that escaped detection on the survey and/or buried prehistoric and historic resources due to the moderately high potential of the GSPA. If such resources are encountered during construction and those resources meet the eligibility criteria of the CRHR, the impact would cause a substantial adverse change in the significance of a historical or archaeological resource. This would be a potentially significant impact to cultural resources. With implementation of Mitigation Measures (MMs) CR-1, CR-2 and CR-3 impacts would be less than significant.

The UPRR (IMP-3424) had previously been recommended as eligible for the NRHP listing under Criterion A. The Glamis Cemetery (IMP-4621) is recommended here as eligible for CRHR listing under Criterion 1. The proposed Specific Plan does not include any ground disturbing activities near either of these sites, and both would be avoided by the proposed Specific Plan. A 10-meter buffer from the current site boundaries shall be established and an archaeological monitor shall be present during all preparation and construction activities that may take place near or within that buffer.

Impact 5.4-2: Would the Project disturb archaeological resources and remains?

Pursuant to CEQA Guidelines §15064.5(c)(1) and (2), an archaeological resource includes an archaeological site that qualifies as a significant historical resource as described for Impact 5.4-1. If an archaeological site does not meet any of the criteria outlined in the provisions under Impact 5.4-1, but meets the definition of a "unique archaeological resource" in PRC 21083.2, the site shall be treated in accordance with the provisions of PRC 21083.2, unless the project applicant and public agency elect to comply with all other applicable provisions of CEQA with regards to archaeological resources. "Unique archaeological resource" means an archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions that there is a demonstrable public interest in that information.

- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important historic event or person.

CEQA Guidelines 15064.5(c)(4) confirms that if an archaeological resource is neither a unique archaeological nor an historic resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

The proposed Specific Plan has the potential to affect a previously recorded resource (CA-IMP-6146 and CA-IMP-6145). The proposed Specific Plan does not include any ground disturbing activities near either of these sites and both sites will be avoided by the Project during construction. The UPRR (IMP-3424) had previously been recommended as eligible for the NRHP listing under Criterion A. The Glamis Cemetery (IMP-4621) is recommended here as eligible for CRHR listing under Criterion 1. The Project does not include any ground disturbing activities near either of these sites, and both will be avoided by the proposed Specific Plan. A 10-meter buffer from the current site boundaries will be established and an archaeological monitor be present during all preparation and construction activities that may take place near or within that buffer.

Ground disturbing activities associated with the proposed Specific Plan during construction would have the potential to cause substantial adverse changes to resources that escaped detection on the survey and/or buried prehistoric and historic resources due to the moderately high potential of the GSPA. If such resources are encountered during construction and those resources meet the eligibility criteria of the CRHR, the impact would cause a substantial adverse change in the significance of a historical or archaeological resource. This would be a potentially significant impact to cultural resources. With implementation of MMs CR-1, CR-2 and CR-3 impacts would be less than significant.

Impact 5.3-3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Site Preparation and Construction

During the construction and phases of the proposed Specific Plan, grading, excavation and trenching will be required. While no potential human remains have been identified in the project area, subsurface activities always have some potential to impact previously unknown remains. This potential impact is considered a significant impact. MM CR-4 will ensure that the potential impacts to previously unknown human remains do not rise to the level of significance pursuant to CEQA. Implementation of MM CR-4 will reduce the potential impact associated with inadvertent discovery of human remains to a level less than significant.

5.4.4. Mitigation Measures

The following MMs would reduce impacts to below a level of significance.

MM CR-1: Cultural Resources Construction Monitor

A cultural resources monitor shall be present during all excavation or other earth-moving activities within the Project site. The applicant shall immediately notify the Imperial County Planning and Development Services Department if any undocumented and/or buried prehistoric or historic resource is uncovered. All construction must stop in the vicinity of the find until the find can be evaluated for its eligibility for listing in the CRHR. The cultural resources monitor shall have the authority to halt construction activity in the immediate vicinity of the encountered historic resource for a sufficient interval of time to allow avoidance or recovery of the encountered historic resources and shall also have the authority to redirect construction equipment in the event that any cultural resource is inadvertently encountered. All cultural resources are assumed to be eligible for the CRHR until determined otherwise by the monitor. Work will not resume in the area of the discovery until authorized by the monitor.

Timing/Implementation:	*During construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM CR-2: Establishment of Environmentally Sensitive Areas

A qualified archaeologist, as approved by the County, will prepare an archaeological testing and evaluation plan prior to conducting any field work. If an archaeological site is determined significant under CEQA, avoidance is recommended by establishing Environmentally Sensitive Areas (ESAs). ESAs will encompass the site boundary plus a 200-foot buffer around the site. ESAs should be staked and/or flagged in a conspicuous manner. Spot checking by a qualified archaeologist should be completed throughout construction to ensure ESAs are not entered. If it is necessary for the Project to encroach on any ESA, full time monitoring by a qualified archaeologist, who is approved by the County, will be required to ensure there are no impacts to the archaeological site. If avoidance is not an option, then a data recovery program should be undertaken.

Timing/Implementation:	*Prior to building permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM CR-3: Data Recovery Program

The proposed Specific Plan was designed to avoid and preserve archaeological resources in place where possible. Where avoidance and preservation are not possible, data recovery through excavation is the most feasible mitigation. Prior to excavation, a data recovery plan must be prepared that makes provision for adequately recovering the scientifically consequential information from and about the historical resource. Data recovery includes the documentation, recordation, and removal of the archeological deposit from a project site in a manner consistent with professional (and regulatory) standards; and the subsequent inventorying, cataloguing, analysis, identification, dating, interpretation of the artifacts and "ecofacts" & the production of a report of findings.

Timing/Implementation:	*Prior to building permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM CR-4: Unanticipated Discovery – Human Remains

In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery will be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC, which will designate a most likely descendant (MLD) for the project (Section 5097.98 of the PRC). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).

Timing/Implementation:	*During construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

Level of Significance After Mitigation

The Project will have less than significant impacts after implementation of MMs CR-1 through CR-4 because these measures require the performance of professionally accepted and legal compliant procedures for the monitoring, discovery, data recovery, and treatment of previously undocumented significant archaeological resources and human remains.

5.5 ENERGY

This section describes the existing energy systems in the vicinity of the Glamis Specific Plan Area (GSPA) and identifies the potential physical environmental impacts that would result from the inefficient, wasteful, and unnecessary consumption of energy from the proposed Project.

Scoping Issues Addressed

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

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study/Notice of Preparation (IS/NOP), located in Appendix A-1, that the following environmental issue areas resulted in no impact and was scoped out of requiring further review in this Draft EIR. Please refer to Appendix A-1 of this Draft EIR for a copy of the NOP/IS and additional information regarding this issue.

- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? Implementation of the proposed Specific Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impacts would occur under this criteria.

5.5.1 Environmental Setting

The Imperial Valley area is located within the south-central part of Imperial County and is bound by Mexico on the south, the Algodones Sand Hills on the east, the Salton Sea on the north and San Diego County on the northwest, and the alluvial fans bordering the Coyote Mountains and the Yuha Desert to the southwest. The Imperial Irrigation District (IID) supplies water and power to most users in the Imperial Valley although they do not provide water to the GSPA. Operations are divided between a water division responsible for distribution and collection of water, and a power division responsible for generation and distribution of electrical power. Natural gas service in the area is provided by the Southern California Gas Company.

Regulatory Setting

Energy conservation is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the U.S. Environmental Protection Agency's [USEPA] EnergyStar™ program) and transportation (e.g., fuel efficiency standards). At the state level, Title 24 of the California Code of Regulations (CCR) sets forth energy standards for buildings. Further, the State provides rebates/tax credits for installation of renewable energy systems and offers the Flex Your Power program promotes conservation in multiple areas. At the local level,

individual cities and counties establish policies in their general plans and climate action plans related to the energy efficiency of new development and land use planning and to the use of renewable energy sources.

Federal

Energy Policy and Conservation Act, and CAFE Standards

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

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

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change.

The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century.

State

Warren-Alquist Act

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

State of California Energy Action Plan

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

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). Further, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports, Governor Davis directed CEC to take the lead in developing a long-term plan to increase alternative fuel use.

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

Integrated Energy Policy Report

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

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

Senate Bill 1078: California Renewables Portfolio Standard Program

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

Senate Bill X1-2: California Renewable Energy Resources Act

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the

renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

Senate Bill 100: California Renewables Portfolio Standard Program

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

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

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

Energy Action Plan

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

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

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan (SAF Plan) in

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

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

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

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

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

In December 2008, CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons (MMT) of carbon dioxide-equivalent (CO_2e) emissions, or approximately 21.7 percent from the State's projected 2020 emission level of 545 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 47 MMT CO_2e, or almost 10 percent, from 2008 emissions). In May 2014, CARB

released and has since adopted the First Update to the Climate Change Scoping Plan to identify the next steps in reaching AB 32 goals and evaluate progress that has been made between 2000 and 2012 (CARB 2014). According to the update, California is on track to meet the near-term 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020 (CARB 2014). The update also reports the trends in GHG emissions from various emissions sectors (e.g., transportation, building energy, agriculture).

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

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

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

Senate Bill 375

SB 375, signed by the Governor in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocation in each MPO's Regional Transportation Plan. CARB, in consultation with the MPOs, is to provide each affected region with

reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035. Implementation of SB 375 will have the co-benefit of reducing California's dependency of fossil fuels and making land use development and transportation systems more energy efficient.

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

Executive Order B-30-15

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

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB, 2016).

Local

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

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

County of Imperial General Plan

The project site is under the County of Imperial jurisdiction and subject to the County Development code and General Plan guidelines. The County General Plan Renewable Energy and Transmission Element (revised on October 6, 2015) includes specific goals, policies and standards for renewable energy and specifically solar projects (Table 5.5-1).

TABLE 5.5-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN ENERGY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Renewable Energy and Transmission Element		
Goal 1 – Support the safe and orderly development of renewable energy while providing for the protection of environmental resources.	Yes	The proposed Specific Plan supports the safe and orderly development of renewable energy (solar. The proposed zoning ordinance allows for on-site solar panels and are a preferred use as shown in the proposed Specific Plan.
Objective 1.2: Lessen impacts of site and design production facilities on agricultural, natural, and cultural resources.	Yes	See response to Goal 1.
Goal 3 – Support development of renewable energy resources that will contribute to and enhance the economic vitality of Imperial County.	Yes	The development of a small commercial solar PV system facilities are supported by the proposed Specific Plan and are allowed through the zoning ordinance in the CR1, CR2, and CR3 zones. This is a viable option to provide the GSP with efficient renewable energy.

Source: Imperial County, 2015.

5.5.2 Existing Conditions

Energy related to land use is primarily associated with direct energy consumption for on-site electricity/heating/cooling facilities at the Glamis Beach Store and the RV Park. Transportation energy use is related to the efficiency of cars, trucks, and public transportation; choice of travel modes (e.g., automobile, carpool, vanpool, and transit); and miles traveled by these modes. energy is also consumed with construction and routine operation and maintenance of land uses.

5.5.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

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

Analysis

Impact 5.5-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The existing use at the GSPA requires diesel generators to supply power. These generators would be phased out once the project has been connected to a constant electricity source. Upgrades to the electrical system could include construction and installation of a power line (transmission line and/or distribution line) by Imperial Irrigation District (IID) to extend power from the nearest substation (approximately 7.2 miles to the northeast). A second and potentially more viable option would be to develop a small commercial solar photovoltaic (PV) system, with a backup battery storage component or another green power system. Retirement of the diesel generators and the use of renewable energy resources would have beneficial impacts. According to the air quality technical study and the GHG screening letter, the generation of energy from solar would not result in any energy related emissions. Interconnection with the IID power grid would tap into an existing energy source and also not result in any new energy emissions related to the proposed Specific Plan. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would occur. This is considered a less than significant impact.

5.5.4 Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

5.6. Geology and Soils

This section addresses potential impacts to geology, soil and paleontological resources that may result from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the Glamis Specific Plan Area; identifies the regulatory framework; identifies and analyzes environmental impacts; and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential impacts to geology, soils, and paleontological resources was derived from of the following sources,

- *Geotechnical Engineering Feasibility Report* prepared by Earth Systems Pacific (August 2019: Appendix G),
- *Paleontological Resources Assessment* prepared by San Diego Natural History Museum (SDNHM, 2019, Appendix H).

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. No comments related to geology and soils, or paleontological resources were received.

Issues Scoped Out

The Imperial County Planning and Development Services Department (County) determined in the Initial Study (IS), located in Appendix A-2, that the following environmental issue area resulted in no impact and was scoped out of requiring further review in this Draft Environmental Impact Report (EIR). Please refer to Appendix A-2 of this Draft EIR for a copy of the IS and additional information regarding this issue.

- 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. Soils within the GSPA currently support the existing septic system and leach field that provide the small amount of wastewater needed for Glamis Beach Store employees. The proposed Specific Plan includes a wastewater treatment plant that would replace the septic system. No impacts related to the soils ability to support septic tanks would occur.

5.6.1. Environmental Setting

Regional Geology

The GSPA lies within the Imperial Valley, a part of the Colorado Desert geomorphic province (**Figure 5.6-1**). A significant feature within the Colorado Desert geomorphic province is the Salton

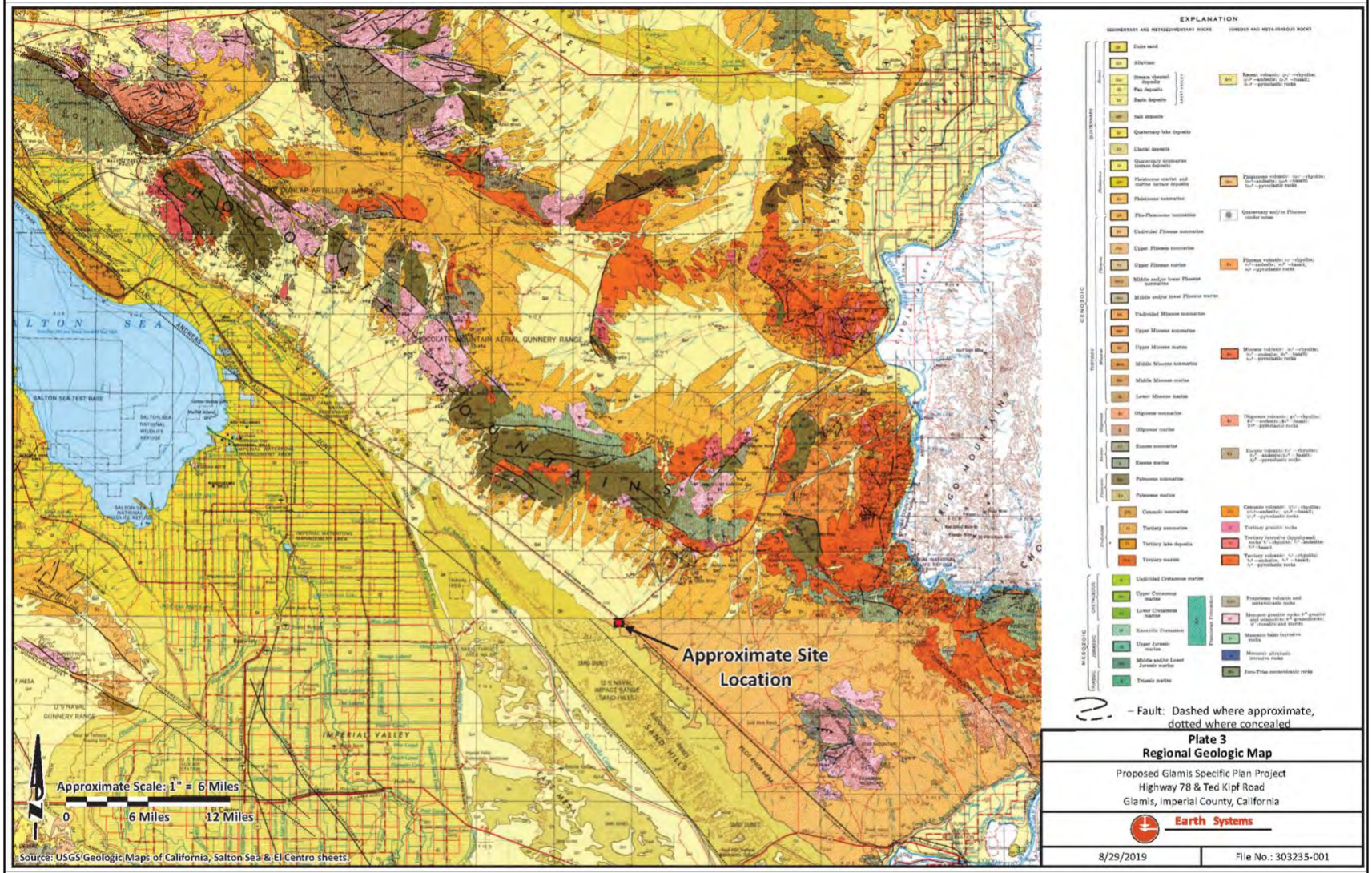
Trough, a large northwest-trending structural depression that extends approximately 180 miles from the San Gorgonio Pass to the Gulf of California. Much of this depression in the area of the Salton Sea is below sea level. The Imperial Valley forms the southerly part of the Salton Trough and exhibits a thick sequence of Miocene to Holocene sedimentary deposits. Mountains bounding the Imperial Valley include the Chocolate Mountains to the northeast, the Santa Rosa Mountains to the west, and associated mountain ranges to the southwest, including the Vallecito, Pinyon, Inkopah, and Jacumba Mountains. These mountains expose primarily Precambrian metamorphic and Mesozoic granitic rocks, with some Tertiary sedimentary deposits and volcanics. Other geologic/geomorphic features in the southern Imperial Valley area include the Salton Sea, Sand Hills (Algodones Dunes), East Mesa, West Mesa, and Borrego Badlands. The geologic conditions present within the County contribute to a wide variety of hazards that can result in loss of life, bodily injury, and property damage. Fault displacement is the principal geologic hazard affecting public safety in Imperial County (Earth Systems Pacific, 2019).

Planning Area Geology

Within the immediate GSPA, native geologic lithologic units consist of a mix of younger (Holocene) dune sand and alluvium, and Pleistocene alluvial fan (fanglomerates) deposits associated with the western flank of the Chocolate Mountains. The San Andreas fault zone within the Imperial Valley consists of the San Andreas fault trending along the northeast shore of the Salton Sea which transitions to the southeast into the Brawley Seismic Zone and Imperial fault (Plate 4). Other significant active faults associated with the San Andreas rift zone, west of the Salton Sea, include the extensions and traces of the Elsinore and San Jacinto fault zones. No major active (last 11,700 years) faults are in the immediate vicinity of the Project site. The San Andreas fault and associated subsidiary faults are considered the primary sources for seismic ground shaking with approximately 15 recognized active faults within 70 miles of the Planning area (Earth Systems Pacific, 2019).

The GSPA is located slightly northeast of the Sand Hills and is located within a mapped area of borderline sedimentary deposit called Pleistocene nonmarine (Qc) and alluvium (Qal), which are associated with deposits from the southwestern flanks of the Chocolate Mountains. Immediately east are the Sand Hills, which is mapped as “Dune Sand” associated with wind-blown deposits. Artificial fill associated with various areas of the GSPA, including building pads, graded parking areas, elevated roadways, railroad beds/right-of-way, and drainage control berms are present. The fills are considered uncompacted and locally contain debris and aggregate base.

Native soils consist of thin deposits of dune sand overlying Quaternary younger and older alluvial deposits. Fills are a mix of locally derived materials. Within the GSPA, the thickness of the true dune sand is generally less than two feet. Fills vary in thickness, being the thickest for roadways and flood control berms (+10 feet) (Earth Systems Pacific, 2019).



SOURCE: Earth Systems Pacific, 2019.

Regional Geology Map
Glamis Specific Plan
Figure 5.6-1

Planning Area Soil Conditions

Twenty-one exploratory borings were drilled to depths ranging from 21½ to 51½ feet below the existing ground surface to observe soil profiles and obtain samples for laboratory testing (**Figure 5.6-2**). The field exploration indicates that GSPA soils consist generally of poorly and well graded sand, poorly and well graded sand with silt, silty sand, silty-clayey-sand and poorly graded gravels to the maximum depth of exploration of 51½ feet below the ground surface. These soils have designations of SP, SW, SP-SM, SW-SM, SM, SC-SM, and GP soil types and were classified according to the Unified Soil Classification System. Cobbles and boulders may be present at depth and were noted based on drilling operations. Refusal was not encountered however high blow counts were encountered at shallow depths ranging between 5 and 20 feet below the ground surface (bgs) or greater. Dune sand deposits are relatively thin (<2 feet) across the site. Fills are considered undocumented and for the most part are probably poorly compact. Clay zones could exist (Earth Systems Pacific, 2019).

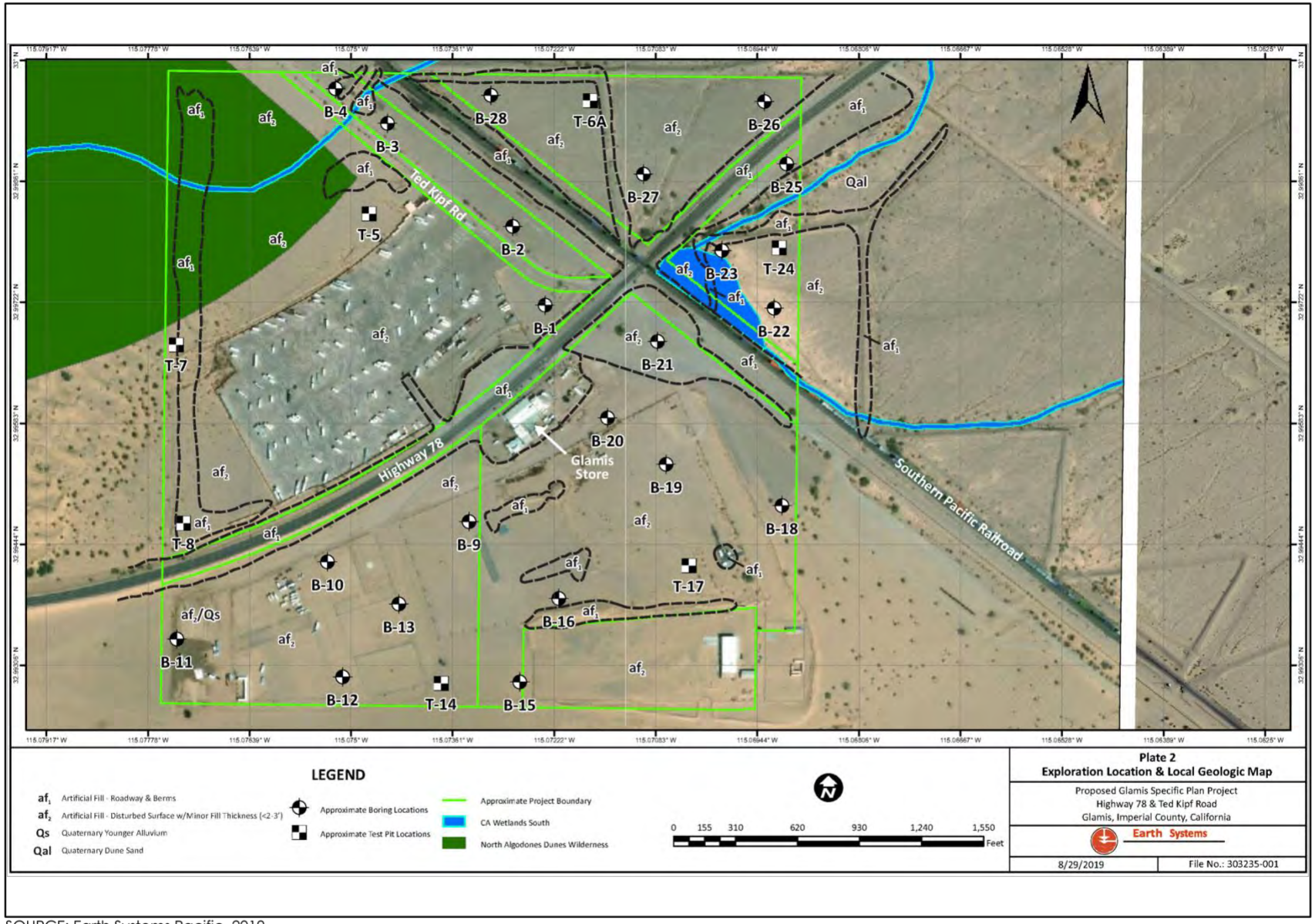
Seismic and Geologic Hazards

Active Faults

The GSPA is within an active seismic region subject to regular earthquake events, resulting in potential seismic hazards as described below. Approximately 15 active faults or seismic zones lie within 70 miles of the GSPA. The primary seismic hazard to the GSPA is strong ground shaking from earthquakes along regional faults including the Brawley and Imperial faults. The Brawley segment of the San Andreas fault is located approximately 24 miles west of the site. The Imperial segment of the San Andreas fault is located approximately 27 miles west of the site (Earth Systems Pacific, 2019).

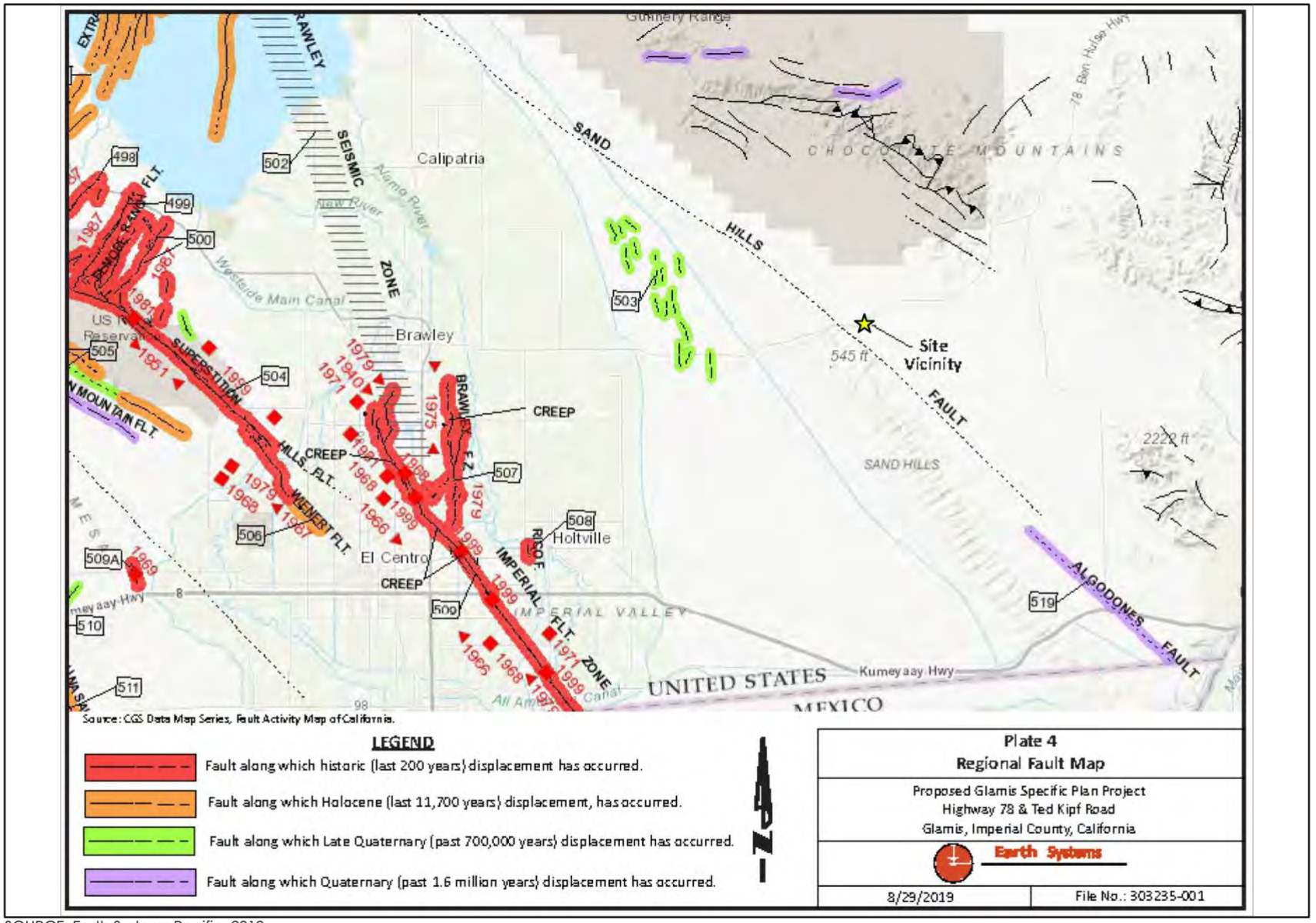
Seismicity

The site is located within a very active seismic area in southern California where large numbers of earthquakes are recorded each year. Approximately 31 magnitude 5.5 or greater earthquakes have occurred within 60 miles of the site since 1852. Significant local Imperial Valley earthquakes have included the 1940 Imperial Valley (6.9), 1942 Fish Creek Mountains (6.6), 1968 Borrego Mountain (6.6), 1979 Imperial (6.4), 1987 Elmore Ranch and Superstition Hills (6.6), and 2010 Baja (7.2) earthquakes. Most of the historic earthquakes have occurred along segments of the San Jacinto fault or Brawley seismic zone which produces very regular ground shaking of low (magnitude 1) to higher magnitude as described above. Ground shaking which may be tolerable from a structural design perspective, can have psychological effects that need to be understood by buyers and users of the site. There are no active faults currently mapped within the Project site. The nearest mapped faults are the inactive and buried Sand Hills fault, located approximately one mile southwest of the Planning area and several Quaternary faults about nine miles west of the GSPA (**Figure 5.6-3**). Several inactive faults within the Chocolate Mountains are located several



SOURCE: Earth Systems Pacific, 2019.

Site Soil Conditions
Glamis Specific Plan
Figure 5.6-2



SOURCE: Earth Systems Pacific, 2019.

Regional Faults Map
Glamis Specific Plan
Figure 5.6-3

miles northwest of the site. The nearest mapped active fault zone is the Brawley seismic zone, located approximately 24 miles west of the GSPA, and the Imperial fault located approximately 27 miles west-southwest of the GSPA (Earth Systems Pacific, 2019).

Seismic Risk

The recent Working Group of California Earthquake Probabilities estimated a 35 to 41 percent conditional probability that a magnitude 6.7 to 7.0 or greater earthquake may occur in 30 years (2014 as base year) along the nearby Coachella segment of the San Andreas fault, 37 to 45 percent for the Brawley seismic zone, 30 to 41 percent for the Imperial fault, and about 5 to 7 percent for the San Jacinto (Superstition Hills section) fault. The revised estimate for an 8+ magnitude earthquake along the local San Andreas fault is about 7%. The primary seismic risk at the GSPA is a potential earthquake along the Brawley seismic zone and San Andreas, San Jacinto, and Imperial faults that are northwest and west of the GSPA. Geologists believe that the San Andreas fault has characteristic earthquakes that result from rupture of each fault segment.

The estimated characteristic earthquake is magnitude 8.1 for a multi-segment San Andreas rupture event. The San Jacinto fault is historically one of the most active faults in southern California, especially in the southern Imperial Valley and San Jacinto Valley. Multi-segment magnitudes for a San Jacinto fault rupture is approximately 7.9 (Earth Systems Pacific, 2019).

Ground Rupture

The GSPA does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone (CGS, 2018). Well-delineated fault lines cross through this region (Figure 5.6-3); however, no active faults are mapped in the immediate vicinity of the GSPA. Therefore, active fault rupture is unlikely to occur at the GSPA. While fault rupture would most likely occur along previously established fault traces, future fault rupture could occur at other locations. Aerial photographs from 1961 to 2016 were reviewed and no naturally occurring lineaments were observed within or adjacent to the site. Anthropic lineal features associated with drainage control are common in the GSPA (Earth Systems Pacific, 2019)

Ground Acceleration

The GSPA may be subject to severe ground shaking due to potential fault movements along regional faults. The site soils are not subject to liquefaction induced bearing failure. As such, the minimum seismic design should comply with the 2016 edition of the California Building Code (CBC) using the seismic coefficients given below (Table 5.6-1).

TABLE 5.6-1 2016 CBC (ASCE 7-10 W/ JULY 2013 ERRATA) SEISMIC PARAMETERS

Site Location	32.99677°N/115.07081°W (approximate central site location)
Site Class	D
Maximum Considered Earthquake [MCE] Ground Motion	
Short Period Spectral Response Ss	0.974 g
1 second Spectral Response, S1	0.358 g
Design Earthquake Ground Motion	
Short Period Spectral Response	SDS 0.721 g
1 second Spectral Response	SD1 0.402 g
PGAM	0.39 g

Source: Earth Systems Pacific, 2019.

The intent of the CBC lateral force requirements are to provide a structural design that will resist collapse to provide reasonable life safety from a major earthquake, but may experience some structural and nonstructural damage. A fundamental tenet of seismic design is inelastic yielding is allowed to adapt to the seismic demand on the structure. In other words, damage is allowed. The CBC lateral force requirements should be considered a minimum design. The owner and the designer may evaluate the level of risk and performance that is acceptable. Performance based criteria could be set in the design. The design engineer should exercise special care so that all components of the design are fully met with attention to providing a continuous load path. An adequate quality assurance and control program is urged during project construction to verify the design plans and good construction practices are followed. This is especially important for sites lying close to major seismic sources. Design peak horizontal ground accelerations are estimated to be above 0.4 g. Vertical accelerations are typically 1/3 to 2/3 of the horizontal acceleration but can equal or exceed horizontal accelerations depending upon underlying geologic conditions and basin effects (Earth Systems Pacific, 2019).

Seiches

A small water storage tank and basin are located approximately 4 miles northeast and upgradient of the GSPA, associated with mining activities. In the event of tank rupture or basin failure due to seiching, there is a remote possibility of some flooding within the defined drainages of the alluvial fan, although it appears, that any runoff would trend southerly of the project, depending on localized drainage courses and man-made modifications to drainage paths (Earth Systems Pacific, 2019).

Liquefaction and Dynamic Settlement

Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. Liquefaction describes a phenomenon in which saturated soil loses shear strength and deforms as a result of increased pore water pressure induced by strong ground shaking during an earthquake. Dissipation of the excess pore pressures will produce volume

changes within the liquefied soil layer, which can cause settlement. Shear strength reduction combined with inertial forces from the ground motion may also result in lateral migration (lateral spreading). Factors known to influence liquefaction include soil type, structure, grain size, relative density, confining pressure, depth to groundwater (typically occurs in the upper 50 feet), and the intensity and duration of ground shaking. Soils most susceptible to liquefaction are saturated, loose sandy soils and low plasticity clay and silt. The results of the geotechnical analyses indicate that groundwater depth is more than 50 feet below the ground surface and therefore liquefaction potential is low (Earth Systems Pacific, 2019).

Ground Subsidence

Based on research of nearby State-monitored groundwater wells, elevations of groundwater and the well ground surface has been generally stable for the last 20 years. Groundwater has deviated approximately 26 feet between 1979 and 2005. As areal subsidence typically occurs on a regional basis and with a large fluctuation of groundwater levels, the effects of subsidence on structures within the GSPA should have a low potential. Based on a United States Geological Survey (USGS) web site, the GSPA is not located within an area of land subsidence in California (Earth Systems Pacific, 2019).

Landsliding

Seismically-induced landsliding is not considered a significant hazard on the GSPA due to the fact the topography is generally level.

Non-Seismic Hazards

Non-seismic geologic hazards include a number of potential physical and chemical effects such as compaction, expansion, erosion, and reactive soils.

Dry Seismic Settlement

The amount of dry seismic settlement is dependent on relative density of the soil, ground motion, and earthquake duration. In accordance with current California Geological Survey (CGS) policy, a site peak ground acceleration of ⅔ Peak Ground Acceleration Mean (PGAM), where PGAM was found to be 0.39 and an earthquake magnitude of 7.9 was used. The potential for seismically induced dry settlement of soils above the groundwater table and the full soil column heights ranging between 7.5 feet and 50 feet bgs was calculated for all borings (Figure 5.6-2). The largest settlement was less than ⅛ inch due to dry seismic forces found at boring B-11, which had a maximum depth of 50 feet. Although the 50-foot-deep boring had the largest settlement, the highest differential settlement occurred for the 25 feet bgs borings (B-15 and B-28). The highest differential settlements were found less than ⅛ inch. Due to the general uniformity of the soils encountered, seismic settlement is expected to occur on an areal basis and as such per Special

Publication 117 (2008), the calculated differential settlement (after Section 5.1 mitigation) between all borings is estimated to be less than ¼ inch (Earth Systems Pacific, 2019).

Expansive Soils

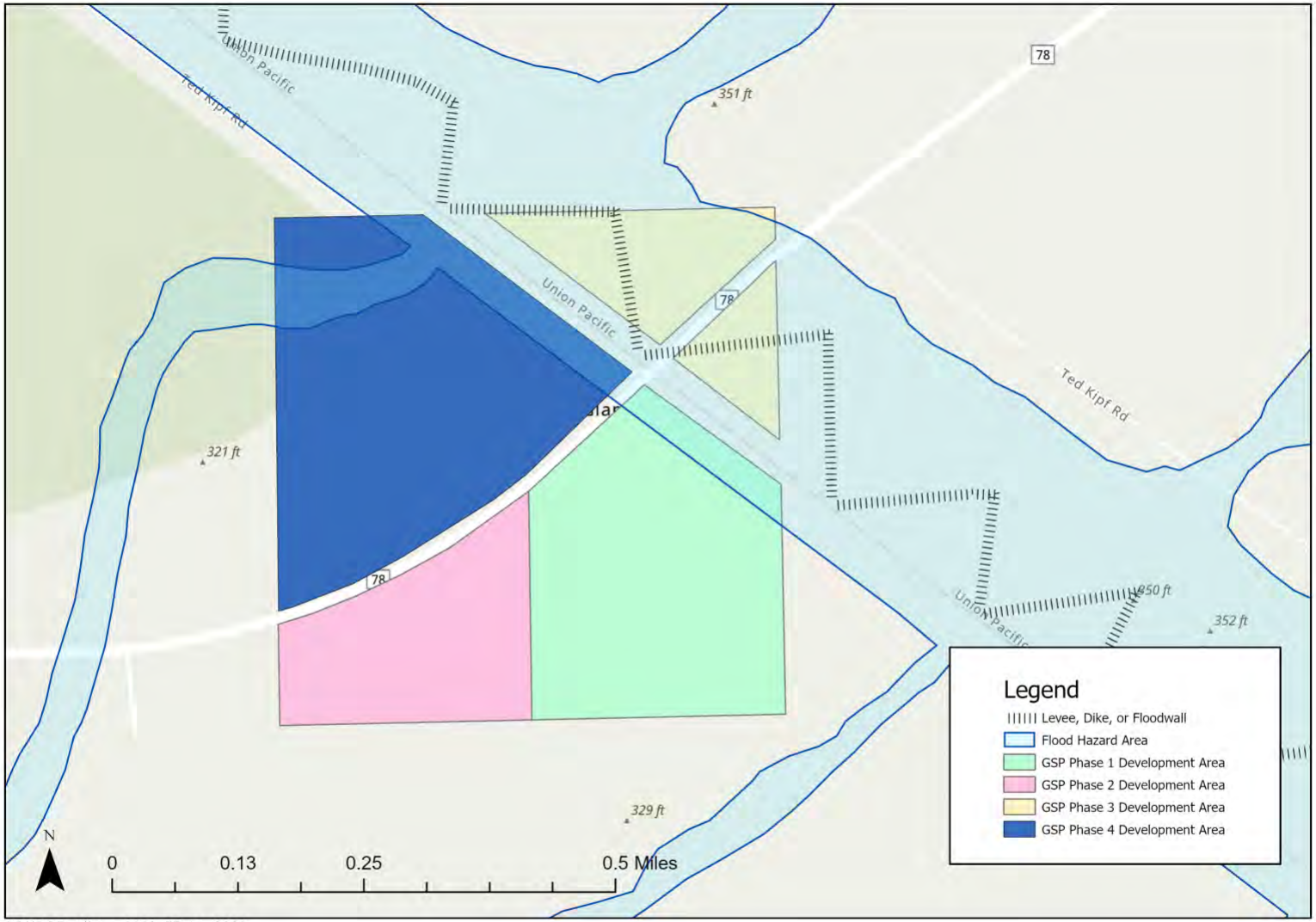
Expansive soils are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported-on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, expansive soils can have a detrimental effect on structures. Based on our visual observations, site soils were observed to be granular however clayey zones could be present. As such, the Expansion Index of the onsite soils is anticipated to be "very low" for granular soils, and if encountered, could be medium-to-high for clayey soils as defined by American Society of Testing and Materials (ASTM) D 4829. Samples of building pad soils should be observed or tested during grading to confirm or modify these findings (Earth Systems Pacific, 2019).

Erosion Potential

The GSPA lies within an area of high potential for wind and water erosion. Planning area soils have a fine-grained component of their composition. As such, exposed soil surfaces may be subject to disturbed fine particulate matter (PM_{10}) which can create airborne dust if the soil surface or roadways are not maintained (Earth Systems Pacific, 2019).

Flooding:

As illustrated on Federal Emergency Management Agency (FEMA) map panels 06025C1125C and 06025C1475C (dated September 26, 2008),the GSPA lies within two designated Federal Emergency Management Agency (FEMA) Flood Zones: "A" and "X" (see Figure 5.6-4) Zone "A" is defined as "Without Base Flood Elevation" and Zone "X" is defined as "Areas of 0.2% annual chance floodplain; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood." The GSPA is in an area where sheet and concentrated flow and erosion could occur. Aerial imagery from 2006 shows what looks like natural storm channel erosion (dry stream beds) present in the middle of the project and south of the Glamis store. Therefore, uncontrolled concentrated flows may exist at or near the GSPA and debris flow may occur (Earth Systems Pacific, 2019).



SOURCE: Altum, 2021; FEMA, 2023.

FEMA Flood Zone Boundary
Glamis Specific Plan
Figure 5.6-4

Reactive Soils

Three samples of the near-surface blended soil and one in situ sample from a depth of 10 feet within the GSPA were tested for potential to corrosion of concrete and ferrous metals. The tests were conducted in general accordance with the ASTM test methods to evaluate pH, resistivity, and water-soluble sulfate and chloride content. These tests should be considered as only an indicator of corrosivity for the samples tested. Other earth materials found on site may be more, less, or of a similar corrosive nature.

In general, the lower the pH (the more acidic the environment), the higher the soil corrosivity will be with respect to ferrous structures and utilities. As soil pH increases above 7 (the neutral value), the soil is increasingly more alkaline and less corrosive to buried steel structures, due to protective surface films, which form on steel in high pH environments. A pH between 5 and 8.5 is generally considered relatively passive from a corrosion standpoint. High chloride levels tend to reduce soil resistivity and break down otherwise protective surface deposits, which can result in corrosion of buried steel or reinforced concrete structures. Soil resistivity is a measure of how easily electrical current flows through soils and is the most influential factor. Four samples recovered from our field sampling were tested for pH, Resistivity, Chlorides, and Sulfate Content. Test results shows pH values ranging from 7.9 to 8.6, chloride contents from 17 ppm to 808 ppm, sulfate contents from 11 ppm to 348 ppm, and resistivities from 520 Ohm-cm to 6,400 Ohm-cm. The corrosion values from the soil tested are normally considered as being “Mildly to Very Severely Corrosive” to buried metals and as possessing a “Negligible” exposure to sulfate attack for concrete as defined in American Concrete Institute (ACI) 318, Section 4.3 (Earth Systems Pacific, 2019).

Paleontological Setting

Paleontological resources (i.e., fossils) are the buried remains and/or traces of prehistoric organisms (i.e., animals, plants, and microbes). Body fossils such as bones, teeth, shells, leaves, and wood, as well as trace fossils such as tracks, trails, burrows, and footprints, are found in the geologic deposits within which they were originally buried. The primary factor determining whether an object is a fossil or not isn’t how the organic remain or trace is preserved (e.g., “petrified”), but rather the age of the organic remain or trace. Although typically it is assumed that fossils must be older than ~11,700 years (i.e., the generally accepted end of the last glacial period of the Pleistocene Epoch), organic remains of early Holocene age can also be considered to represent fossils because they are part of the record of past life (SDNHM, 2019).

Fossils are considered important scientific and educational resources because they serve as direct and indirect evidence of prehistoric life and are used to understand the history of life on Earth, the nature of past environments and climates, the membership and structure of ancient ecosystems, and the pattern and process of organic evolution and extinction. In addition, fossils are considered to be non-renewable resources because typically the organisms they represent no longer exist. Thus, once destroyed, a particular fossil can never be replaced. And finally, for the purposes of

this report, paleontological resources can be thought of as including not only the actual fossil remains and traces, but also the fossil collecting localities and the geologic units containing those localities (SDNHM 2019).

GSPA Paleontology

There are no SDNHM fossil collection localities known from within a 5-mile radius of the GSPA. However, there is one SDNHM locality recorded from Pleistocene-age gravel deposits located approximately 22 miles southeast of the GSPA from another portion of the Algodones Dunes, where a partial lower jaw with two cheek teeth identified as horse, *Equus sp*., were found in excavation spoils along the south side of the All-American Canal (SDNHM, 2019).

Portions of the GSPA that have been previously developed consisted of graded pads that were raised above original grade, supported by what appears to be imported gravel fill. Based on the alluvial fan deposits of Pleistocene age are generally assigned an undetermined paleontological potential due to variation in the concentration of fossil resources, typically linked to the grain size of individual alluvial deposits (i.e., fine-grained sediments reflective of low energy conditions more likely to preserve fossil remains vs. coarse-grained and gravelly sediments reflective of high-energy conditions less likely to preserve fossil remains). In addition, paleontological potential typically varies with geologic age (i.e., Pleistocene and older sediments more likely to contain fossil remains than younger, Recent or modern sediments). Among the various methods for determining the age of surficial sedimentary deposits is the degree of surface erosion/dissection evident at a given location (i.e., heavily dissected ground surfaces reflect prolonged time period vs. undissected ground surfaces reflect short time period).

Given these criteria, the sedimentary deposits observed during the paleontological field survey appeared to be Holocene in age (undissected ground surface indicating that these deposits have not been subjected to significant erosion by the action of streams and are, therefore, likely Holocene in age). Holocene-age alluvial fan deposits are assigned a “low” paleontological potential because of their relatively young geologic age (i.e., less than 11,700 years old). These deposits appear to be present throughout the GSPA, except in previously graded portions of the GSPA, where they appear to be overlain by imported gravel fill materials, which are assigned no paleontological potential.

The underlying sedimentary deposits were undissected by the action of modern ephemeral streams, and therefore appeared to be younger than the mapped Pleistocene-age alluvial fan deposits. Based on the distribution and character of these deposits, they likely represent Holocene-age or modern distal-fan deposits derived from the Chocolate Mountains to the northeast of the GSPA. No fossils were encountered during the field survey (SDNHM, 2019).

5.6.2. Regulatory Setting

Geologic resources and geotechnical hazards are governed by local jurisdictions. The conservation elements and seismic safety elements of city and county general plans contain policies for the protection of geologic features and avoidance of hazards. The California Environmental Quality Act (CEQA) is the major environmental statue that guides the design and construction of projects on non-federal lands in California. This statute sets forth a specific process of environmental impact analysis and public review. In addition, the project proponent must comply with other applicable State and local statutes, regulations and policies. Relevant and potentially relevant statutes, regulations and policies are discussed below.

State

Geology

California Building Code

The CBC (2019), as contained in Title 24 California Code of Regulations (CCR) Part 2, has been adopted by the California Building Standards Commission and other agencies within the State of California, including Imperial County. This Code implements the requirements contained in the 2018 International Building Code and consists of 12 parts that contain administrative regulations of the California Building Standards Commission. Local agencies must ensure that development in their jurisdictions complies with guidelines contained in the CBC. Cities and counties can, however, amend the CBC to adopt more stringent building standards beyond those provided because of unique climatic, geological, or topographical conditions.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 regulates development near active faults, with the specific intention of mitigating the hazard of surface fault rupture on buildings intended for human occupancy. In accordance with this law, the CGS maps active faults and designates Earthquake Fault Zones along mapped faults. This Act groups faults into categories of active (historic or Holocene-age faults), potentially active (Quaternary-age faults), and inactive (pre-Quaternary age faults).

Local government agencies are mandated by this Act to require site-specific geologic investigations for proposed projects contained within a designated Alquist-Priolo Earthquake Fault Zone area. Such investigations typically include subsurface trenching to determine the presence, or lack of faulting.

Under this Act, the California State Geologist identifies areas in the state that are at risk from surface fault rupture. The main purpose of this Act is to prevent construction of buildings used for human occupancy where traces of active faults are evident on the earth’s surface. Fault rupture

generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. Such a rupture could potentially displace and/or deform the ground surface. The GSPA is not located within a delineated Earthquake Fault Zone.

Seismic Hazards Mapping Act of 1990

In accordance with Public Resources Code, Chapter 7.8, Division 2, the California Department of Conservation, CGS, the State Geologist compiled maps identifying Seismic Hazard Zones. The Seismic Hazards Mapping Act of 1990 addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. The purpose of this Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, such as those associated with strong ground shaking, liquefaction, landslides, other ground failures, or other hazards caused by earthquakes.

Cities, counties, and state agencies are directed to use and incorporate site-specific geotechnical hazard investigations and seismic hazard zone maps developed by CGS in their land use planning, as part of their permit approval process. This Act provides a mechanism to identify when provisions beyond standard building codes are necessary to ensure safe development and to reduce future losses.

Paleontology

California Code of Regulations, Title 14, Division 3, Chapter 1, Sections 4307-4309

These code sections prohibit the removal and destruction of geological features and any object of archaeological or historical interest or value. Section 4309 provides that the Department of Parks and Recreation may grant a permit to remove, treat, disturb, or destroy plants or animals or geological, historical, archaeological, or paleontological materials.

California Environmental Quality Act (CEQA)

CEQA affords paleontological resources explicit protection, specifically in item V(c) of CEQA Guidelines Appendix G, the Environmental Checklist Form, which addresses the potential for adverse impacts to "unique paleontological resource[s] or site[s] or … unique geological feature[s]." This provision covers fossils of significant importance—remains of species or genera new to science, as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth.

In addition, CEQA provides that generally, a resource shall be considered "historically significant" if it has yielded or may be likely to yield information important in prehistory (Public Resources Code [PRC] Section 15064.5[a][3][D]). Paleontological resources would fall within this category. Sections 5097.5 and 30244 of PRC Chapter 1.7 also define unauthorized removal of fossil resources as a misdemeanor and require mitigation of disturbed sites.

Paleontological resources are classified as nonrenewable scientific resources and are protected by state statute (PRC Section 5097.5). However, neither state nor local agencies have specific jurisdiction over paleontological resources, but all must evaluate potential impacts and provide applicable mitigation measures. State and local agencies do not require a paleontological collecting permit to allow for the recovery of fossil remains discovered as a result of construction-related earthmoving on state or private land in a project site.

Local

Imperial County General Plan Seismic and Public Safety Element

The Imperial County General Plan includes a "Seismic and Public Safety Element." The Seismic and Public Safety Element identifies potential natural and human-induced hazards and provides policy to avoid or minimize the risk associated with hazards. Potential hazards must be addressed in the land use planning process to avoid the unfolding of dangerous situations. The policies and implementation measures in the General Plan applicable to the Project are outlined below (Table 5.6-2).

TABLE 5.6-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN GEOLOGY, SOILS, AND SEISMICITY POLICIES

General Plan Policies	Consistency	Analysis
Seismic and Public Safety Element		
Goal 1: Include public health and safety considerations in land use planning. ● **Objective 1.1**: Ensure that data on geological hazards is incorporated into the land use review process, and future development process. ● Objective 1.4: Require, where possessing the authority, that avoidable seismic risks be avoided; and that measures, commensurate with risks, be taken to reduce injury, loss of life, destruction of property, and disruption of service. ● Objective 1.7: Require developers to provide information related to geologic and seismic hazards when siting a proposed project.	Yes	The proposed Specific Plan is committed to protecting public health and safety by providing proposed zoning with compatible allowable uses, a Conceptual Site plan showing preferred land uses within a compatible physical arrangement. Future development within the Planning area will be required to comply with California and County building codes, and seismic standards. Proposed development will be regulated within flood-way areas in accordance with the Federal Emergency Management Agency (FEMA). Avoidable seismic risks will be avoided. The GSP implements measures, commensurate with risks, to reduce injury, loss of life, destruction of property and disruption of service. Environmental hazards will be considered when siting critical proposed facilities within the Glamis Specific Plan Area (GSPA).
Goal 2: Minimize potential hazards to public health, safety, and welfare and prevent the loss of life and damage to health and property resulting from both natural and human-related phenomena.	Yes	The proposed Specific Plan ensures that adequate emergency preparedness and evacuation plans to respond to identified hazards and potential emergencies by implementing additional hydrant connections within Vendor Row as well as, during Special Events, on-site

TABLE 5.6-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN GEOLOGY, SOILS, AND SEISMICITY POLICIES

General Plan Policies	Consistency	Analysis
● **Objective 2.2:** Reduce risk and damage due to seismic hazards by appropriate regulation. ● **Objective 2.5:** Minimize injury, loss of life, and damage to property by implementing all state codes where applicable. ● **Objective 2.8:** Prevent and reduce death, injuries, property damage, and economic and social dislocation resulting from natural hazards including flooding, land subsidence, earthquakes, other geologic phenomena, levee or dam failure, urban and wildland fires and building collapse by appropriate planning and emergency measures.		law enforcement and fire protection will be provided with applicable services and apparatus. The proposed Specific Plan is appropriately regulated with applicable provisions including the Alquist – Priolo Special Studies Zone Act, California Building Code and Title 9 Division 15 of the County Land Use Ordinance. Furthermore, the proposed Specific Plan implements all site-specific recommendations set-forth in the Geotechnical Report prepared for the project. Additionally, signage will be strategically located throughout the GSPA to prevent unsafe crossings of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR). A proposed off highway vehicle (OHV) and pedestrian under-crossing in the vicinity of SR-78 and the Glamis Mainstreet will be built in concert with the build-out of the project.
Seismic/Geologic Hazards Policy 4: Ensure that no structure for human occupancy, other than one-story wood frame structures, shall be permitted within fifty feet of an active fault trace as designated on maps compiled by the State Geologist under the Alquist – Priolo Special Studies Zone Act.	Yes	In the Geotechnical Engineering Feasibility Report it is found that there are no active faults within the GSPA. The nearest mapped active fault is the Brawley seismic zone which is located 24 miles west of the site, and the Imperial fault located 27 miles west-southwest of the site. As a result, future development within the GSPA is not located within fifty feet of an active fault trace as designated on maps compiled by the State Geologist under the Alquist-Priolo Special Studies Zone Act.

Source: County of Imperial, n.d.

While this Draft EIR analyzes the Project's consistency with the County of Imperial General Plan pursuant to CEQA Guidelines, Section 15125(d), the Imperial County Planning Commission ultimately determines consistency with the General Plan.

5.6.3. Analysis of Project Effects and Significance Determination

Methodology

Geology and Soils

The potential impacts associated with the proposed Specific Plan are evaluated on a qualitative and quantitative basis through a comparison of the anticipated Specific Plan effects on geologic resources. The change in the land use to develop the GSPA would be significant if the effects described below would occur. The evaluation of Specific Plan impacts is based on the significance

criteria adopted by the Imperial County, which the County has determined to be appropriate criteria for this Draft EIR.

Paleontological Resources

To evaluate the proposed Project's potential impacts on significant paleontological resources, a paleontological records search was conducted at the SDNHM to determine if any documented fossil collection localities occur within the GSPA or its immediate surroundings. This involved examination of the SDNHM paleontological database for any records of known fossil collection localities within a 5-mile radius of the GSPA. A paleontological field survey of the GSPA was conducted to confirm the published geologic mapping, to field check the results of the literature and record searches, and to determine the paleontological potential of the strata present. As discussed previously, Museum records indicate that no vertebrate fossil localities have been documented within the GSPA and no fossils were found during the pedestrian survey.

Guidelines for Determination of Significance

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

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
2. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?
3. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction?
4. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides?
5. Result in substantial soil erosion or the loss of topsoil?
6. 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?
7. 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?
8. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact 5.6-1: Would the project result in substantial adverse effects from the rupture of a known earthquake fault?

The GSPA is located in southern California, an area known to be geologically active, and which is subject to seismic events. The Planning area does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone. Well-delineated fault lines cross through this region as shown on CGS maps; however, no active faults are mapped in the immediate vicinity of the GSPA. Therefore, active fault rupture is unlikely to occur at the GSPA. While fault rupture would most likely occur along previously established fault traces, future fault rupture could occur at other locations. Aerial photographs from 1961 to 2016 were reviewed and no naturally occurring lineaments were observed within or adjacent to the site. Anthropic lineal features associated with drainage control are common in the site vicinity (Earth Systems Pacific, 2019). Thus, there would be a less than significant impact from rupture of a known earthquake fault.

Impact 5.6-2: Would the project result in substantial adverse effects from strong seismic ground shaking?

Approximately 15 active faults or seismic zones lie within 70 miles of the GSPA. The primary seismic hazard to the site is strong ground shaking from earthquakes along regional faults including the Brawley and Imperial faults. The Brawley segment of the San Andreas fault is located approximately 24 miles west of the GSPA. The Imperial segment of the San Andreas fault is located approximately 27 miles west of the GSPA. The GSPA is located within a very active seismic area in southern California where large numbers of earthquakes are recorded each year. Approximately 31 magnitude 5.5 or greater earthquakes have occurred within 60 miles of the site since 1852. Significant local Imperial Valley earthquakes have included the 1940 Imperial Valley (6.9), 1942 Fish Creek Mountains (6.6), 1968 Borrego Mountain (6.6), 1979 Imperial (6.4), 1987 Elmore Ranch and Superstition Hills (6.6), and 2010 Baja (7.2) earthquakes (Earth Systems Pacific, 2019).

Most of the historic earthquakes have occurred along segments of the San Jacinto fault or Brawley seismic zone which produces very regular ground shaking of low (magnitude 1) to higher magnitude as described above. Ground shaking which may be tolerable from a structural design perspective, can have psychological effects that need to be understood by buyers and users of the site (Earth Systems Pacific, 2019).

While accurate earthquake predictions are not possible, various agencies have conducted statistical risk analyses. In 2013, the CGS and the USGS presented new earthquake forecasts for California (USGS UCERF3). The recent Working Group of California Earthquake Probabilities estimated a 35 to 41 percent conditional probability that a magnitude 6.7 to 7.0 or greater earthquake may occur in 30 years (2014 as base year) along the nearby Coachella segment of the San Andreas fault, 37 to 45 percent for the Brawley seismic zone, 30 to 41 percent for the Imperial fault, and about 5 to 7 percent for the San Jacinto (Superstition Hills section) fault. The revised estimate for

an 8+ magnitude earthquake along the local San Andreas fault is about 7%. The primary seismic risk at the site is a potential earthquake along the Brawley seismic zone and San Andreas, San Jacinto, and Imperial faults that are northwest and west of Glamis. Geologists believe that the San Andreas fault has characteristic earthquakes that result from rupture of each fault segment. The estimated characteristic earthquake is magnitude 8.1 for a multi-segment San Andreas rupture event. The San Jacinto fault is historically d San Jacinto Valley. Multi-segment magnitudes for a San Jacinto fault rupture is approximately 7.9.

Mitigation Measures (MMs) GEO-1a through d would be required to mitigate impacts. With the implementation of MMs GEO-1a through d, impacts under this criterion would be reduced to less than significant.

Impact 5.6-3: Would the project result in substantial adverse effects from seismic-related ground including liquefaction?

Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. Liquefaction describes a phenomenon in which saturated soil loses shear strength and deforms as a result of increased pore water pressure induced by strong ground shaking during an earthquake. Dissipation of the excess pore pressures will produce volume changes within the liquefied soil layer, which can cause settlement. Shear strength reduction combined with inertial forces from the ground motion may also result in lateral migration (lateral spreading). Factors known to influence liquefaction include soil type, structure, grain size, relative density, confining pressure, depth to groundwater (typically occurs in the upper 50 feet), and the intensity and duration of ground shaking. Soils most susceptible to liquefaction are saturated, loose sandy soils and low plasticity clay and silt. Groundwater depth at the GSPA is more than 50 feet below the ground surface and therefore liquefaction potential is low. (Earth Systems Pacific, 2019). Thus, the impact would be less than significant.

Impact 5.6-4: Would the project result in substantial adverse effects from landslides.

Due to the flat topography of the site the potential for a landslide is very low. No mitigation is required.

Impact 5.6-5: Would the project result in substantial soil erosion or the loss of topsoil?

The proposed Specific Plan would result in changes to the current topography because of grading and site preparation activities. Although these changes will be designed to meet stringent regulatory requirements, there is a potential for soil erosion, loss of topsoil, and geologic instability.

Impact 5.6-6: Landslides, lateral spreading, subsidence, liquefaction or collapse?

Potential effects from landslides and liquefaction, which can include excessive settlement, ground rupture and lateral spreading were discussed in Impact 5.4-3 and 5.4-4.

Impact 5.4-7: Would the project result in the potential for substantial risks to life or property due to expansive soil?

Expansive soils are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may cause unacceptable settlement or heave of structures, concrete slabs supported-on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, expansive soils can have a detrimental effect on structures. Site soils were observed to be granular however clayey zones could be present. As such, the Expansion Index of the onsite soils is anticipated to be "very low" for granular soils, and if encountered, could be medium-to-high for clayey soils as defined by ASTM D 4829. Samples of building pad soils should be observed or tested during grading to confirm or modify these findings (Earth Systems Pacific, 2019).

Impact 5.6-8: Direct or indirect destruction of a unique paleontological resource, site or unique geologic feature?

Previous geologic mapping reports indicate that the Planning area is immediately underlain by "Pleistocene nonmarine sedimentary deposits." Although in most cases Pleistocene sedimentary deposits are typically assigned an undetermined paleontological potential, the observation of probable Holocene-age undissected alluvial deposits on-site during the paleontological field survey supports a low paleontological potential rating for the sedimentary deposits underlying the GSPA. In addition, the artificial fill present in previously graded portions of the Planning area has no paleontological potential. Given the no-to-low paleontological potential of the deposits present within the GSPA, it is unlikely that their disturbance by earthwork related to future development within the GSPA will result in negative impacts to paleontological resources (SDNHM, 2019). Thus, potential impacts to paleontological resources would be less than significant and no mitigation is required.

5.6.4. Mitigation Measures

The following MMs would reduce impacts to below a level of significance.

MM GEO-1: Retain qualified professional staff for design

(a) A qualified professional should design any permanent structure constructed on the site. The minimum seismic design should comply with the CBC in effect at the time specific developments are proposed.

(b) Preventative measures to reduce seasonal flooding and erosion should be incorporated into site grading plans. Dust control should also be implemented during construction. Site grading should be in strict

compliance with the requirements of the South Coast Air Quality Management District [SCAQMD].

(c) Preventative measures to reduce collapse should be incorporated into site grading plans. Storm drainage should flow away from foundations per the minimum building code regulations and water conduits should be repaired immediately or the design should follow the potential for maximum collapse not based on an active water depth as assumed in this report. Water introduction into the subsurface should be kept well away from planned structures and improved areas.

(d) Proper geotechnical observation and testing during construction is imperative to allow the geotechnical engineer the opportunity to verify assumptions made during the design process, to verify our geotechnical recommendations from future design-level studies have been properly interpreted and implemented during construction and as required by the CBC in effect at the time of construction. Observation of fill placement by the Geotechnical Engineer of Record should be in conformance with the CBC in effect at the time.

Timing/Implementation:	*Prior to building permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

Level of Significance After Mitigation

Implementation of MMs GEO-1a through GEO-1d would reduce the risk from strong seismic ground shaking to a level that is less than significant by ensuring proper engineering designs standards are used.

5.7 Greenhouse Gas Emissions

This section addresses potential impacts on greenhouse gases that may result from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the Planning area, the regulatory framework, identifies and analyzes environmental impacts from greenhouse gas emissions, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

The analysis in this section is based on the *Glamis Specific Plan Greenhouse Gas Screening Letter* prepared by LdN Consulting (LdN Consulting, 2020b). The report and its attachments are included as Appendix C-2.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. No issues related to greenhouse gas emissions were raised.

Issues Scoped out as part of the Initial Study

None.

5.7.1 Environmental Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By

contrast, CH_4 has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis.

California produced 440.4 million metric tons (MMT) CO_2e in 2015. The major source of GHG in California is transportation, contributing 37 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state's GHG emissions. California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. The California Air Resources Board (CARB) has projected statewide unregulated GHG emissions for the year 2020 is projected to be 509 MMT CO_2e. These projections are based on Business as Usual (BAU) conditions and represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

5.7.2 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

State

Executive Order S-3-05

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 states that by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels. In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report recommended various strategies that the state could pursue to reduce GHG emissions. These strategies could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture.

Assembly Bill 32 and CARB Scoping Plan

To further the goals established in EO S-3-05, the Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, the CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is

required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2e). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and CAT early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following:

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33%;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions;
4. Establishing targets for transportation related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan (CARB 2008), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020) absent GHG reducing laws and regulations (referred to as BAU). To calculate this percentage reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the 2011 Final Supplement to the AB 32 Scoping Plan Functional Equivalent

Document, CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7% (down from 28.5%) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009–2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 28.5%) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050. Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal.

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050". Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the Intergovernmental Panel on Climate Change (IPCC). Using the recalculated 1990 emissions level (431 MMT CO_2e) and the revised 2020-emissions-level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 28.5% or 16%) from the BAU conditions.

In January 2017, CARB released, *The 2017 Climate Change Scoping Plan Update*, for public review and comment. This update proposes CARB's strategy for achieving the state's 2030 GHG target as

established in Senate Bill (SB) 32, including continuing the Cap-and-Trade Program through 2030, and includes a new approach to reduce GHGs from refineries by 20%. The Second Update incorporates approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document that was adopted by CARB in March 2017), acknowledges the need for reducing emissions in agriculture, and highlights the work underway to ensure that California's natural and working lands increasingly sequester carbon. During development of the Second Update, CARB held a number of public workshops in the Natural and Working Lands, Agriculture, Energy, and Transportation sectors to inform development of the 2030 Scoping Plan Update. The Second Update has not been considered by CARB's Governing Board at the time this analysis was prepared.

Executive Order S-01-07

EO S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

Assembly Bill 939 and Senate Bill 1374

AB 939 requires that each jurisdiction in California divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. SB 1374 requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004, suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Senate Bill 1368

SB 1368 is the companion Bill of AB 32 and was adopted September 2006. SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007, and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by the CPUC and the California Energy Commission (CEC).

Senate Bill 97

SB 97 was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under the California Environmental Quality Act (CEQA). SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural

Resources Agency was required to certify and adopt those guidelines by January 1, 2010. Pursuant to the requirements of SB 97 as stated above, on December 30, 2009, the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided, and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010, and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."
- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

Senate Bills 1078, 107, and X1-2 and Executive Orders S-14-08 and S-21-09

SB 1078 requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 changed the target date to 2010. EO S-14-08 was signed on November 2008 and expands the State's Renewable Portfolio Standard (RPS) to 33 percent renewable energy by 2020. EO S-21-

09 directed CARB to adopt regulations by July 31, 2010, to enforce S-14-08. SB X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations Title 24, Part 6

California Code of Regulations (CCR) Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions. The Energy Commission adopted 2008 Standards on April 23, 2008, and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. All buildings for which an application for a building permit is submitted on or after July 1, 2014, must follow the 2013 standards. The 2013 commercial standards are estimated to be 30 percent more efficient than the 2008 standards; 2013 residential standards are at least 25 percent more efficient. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

Senate Bill 375

SB 375 was adopted in September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable community's strategy or alternate planning strategy for consistency with its assigned targets.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, CEQA incentivizes, through streamlining and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as "transit priority projects."

Senate Bill X7-7 (SB X7-7)

SB X7-7, enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water

Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

California Green Building Standards Title 24, Part 6

. Title 24 of the CCR was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the CEC (and revised if necessary) (California Public Resources Code [PRC], Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California PRC, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California PRC, Section 25402(d)) and cost effectiveness (California PRC, Sections 25402(b)(2) and (b)(3)). These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2022 Title 24 standards are the currently applicable building energy efficiency standards were adopted on August 11, 2021 and will become effective on January 1, 2023. According to the California Energy Commission (California Energy Commission 2022), the benefits of the 2022 standards are that they:

- Increase on-site renewable energy generation from solar.
- Increases electric load flexibility to support grid reliability.
- Reduces emissions from newly constructed buildings.
- Reduces air pollution for improved public health; and
- Encourage adoption of environmentally beneficial efficient electric technologies.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as "CALGreen," and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code

requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective on January 1, 2017. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance;
- Diversion of 65% of construction and demolition waste from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle board.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs (24 CCR Part 11).

The CPUC, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include the following: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030. As most recently defined by the CEC in its 2015 Integrated Energy Policy Report, a ZNE code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's Time Dependent Valuation metric.

Title 20. Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning

heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-30-15 (EO B-30-15)

Executive Order B-30-15, signed by Governor Jerry Brown on April 20, 2015, identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B- 30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO_2e. EO B-30-15 also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Local

Currently, greenhouse gas emission limits for projects such as the proposed Project, have not been adopted by the Imperial County Air Pollution Control District (ICAPCD). In the absence of GHG significance thresholds, it's acceptable to utilize thresholds from South Coast Air Quality Management District (SCAQMD) as these thresholds have been utilized throughout imperial county (SCAQMD, 2008). These thresholds state that screening thresholds for industrial should be 10,000 MT/year CO2e, 3,500 MT/year CO2e for residential projects and 3,000 MT/year CO2e for mixed use projects. Given this, using a 3,000 MT/year CO2e threshold would be recommended (LdN Consulting, 2020b).

General Plan Consistency

The Imperial County General Plan contains goals, objectives, policies and/or programs to conserve the natural environment of Imperial County, including air quality. Table 5.7-1 summarizes the Project's consistency with the applicable air quality goal and objectives from the General Plan.

TABLE 5.7-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element		
Goal 7: The County shall actively seek to improve and maintain the quality of air in the region. • **Objective 7.6:** Explore and assess strategies to reduce greenhouse gas emissions in the County.	Yes	The Imperial County Air Pollution Control District (ICAPCD) seeks to improve and maintain the quality of air in Imperial County through issuance of air quality management plans, rules, and regulations that reflect both state and federal requirements for meeting air quality objectives. The proposed Specific Plan must comply with the requirements of these plans, rules, and regulations to gain approval from the County.

Source: Imperial County, 2016.

5.7.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
2. Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Analysis

Impact 5.7-1: Would development of the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Construction activities for Phase 1 through Phase 4 would occur within a timeframe of 20 to 50 years. Grading and construction of the Project will produce approximately 2,956.83 MT of CO_2e over a three-year buildout. Based on SCAQMD methodology, it is recommended to average the construction emissions over the Project life, which is assumed to be 30 years (SCAQMD, 2008). Given this, the annual construction emission for the proposed Project is 98.56 MT of CO_2e per year and is shown in Table 5.7-2.

TABLE 5.7-2: PROPOSED PROJECT CONSTRUCTION CO2E EMISSIONS SUMMARY MT/YEAR

Year	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2021	0.00	862.49	862.49	0.17	0.00	866.83
2022	0.00	1872.25	1872.25	0.14	0.00	1875.75
2023	0.00	213.85	213.85	0.02	0.00	214.25
					TOTAL	**2,956.83**
Yearly Average Construction Emissions (Metric Tons/year over 30 years)						98.56

Source: LdN Consulting, 2020b.

Operational Emissions

The proposed Project buildout would generate 872.85 MT CO2e annually, which is shown in Table 5.7-3. These emissions include the design as identified within this report and assume all electrical emissions are offset with renewable sources. The site would be operational roughly 67% of the time. During the season when the facilities are not operational, some energy use is expected though would be minimal. Solar however will produce power year-round. Based on this, GHG emissions from energy sources are anticipated to be zero. It should be noted: if the solar offset only 15 percent of the electrical use the project emissions would still be under the 3,000 MT/year CO2e threshold.

TABLE 5.7-3: OPERATIONAL GHG EMISSIONS (MT/YEAR) – OCTOBER THROUGH MAY

Source	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e (MT/Yr)
Area	0.00	0.11	0.11	0.00	0.00	0.11
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.00	678.19	678.19	0.05	0.00	679.46
Waste	12.95	0.00	12.95	0.77	0.00	32.10

TABLE 5.7-3: OPERATIONAL GHG EMISSIONS (MT/YEAR) – OCTOBER THROUGH MAY

Source	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e (MT/Yr)
Water	2.07	53.63	55.70	0.21	0.01	62.62
					Construction Emissions	98.56
					Project Total GHG Emissions	872.85

Data is presented in decimal format and may have rounding errors. Data is reduced 67% due to operational year (October to May)
Source: LdN Consulting, 2020b.

As shown on Table 5.7-3, neither construction activities nor operational activities would generate yearly GHG emissions in excess of the 3,000 MT/year CO_2e threshold. Therefore, no significant impacts would be expected.

Impact 5.7-2: Would the project conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

A proposed project exceeding the 20,000 annual MT screening threshold could have a significant environmental impact under CEQA. The proposed Project would not exceed the threshold; thus, emissions, when combined with existing, approved, proposed, and reasonably foreseeable projects within the County would not result in cumulative emissions that would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Implementation of the project would not exceed the IPAPCD GHG emission thresholds; and thus, would not cumulatively contribute to significant or adverse impacts.

5.7.4 Mitigation Measures

No mitigation is required.

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5.8. Hazards and Hazardous Materials

This section describes the existing conditions with regard to potential hazards within the Glamis Specific Plan Area (GSPA), the regulatory framework, potential hazards created as a result of implementing the proposed Specific Plan and provides mitigation measures to reduce these impacts. The regulatory framework discussion focuses on the federal, state, and local regulations that apply.

The analysis presented in this section is based, in part, on the *Hazardous Materials Technical Study* prepared by Ninyo & Moore (2020). This report is provided as Appendix I of this EIR.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from agencies and the public. No comments were received on hazardous materials and waste.

Issues Scoped out as part of the Initial Study

The Imperial County Planning and Development Services Department (County) determined in the Initial Study/Notice of Preparation (IS/NOP), located in Appendices A-1 and A-2, that the following environmental issue areas resulted in no impact or less-than-significant impact, and were scoped out of requiring further review in this draft EIR. Please refer to Appendices A-1 and A-2 of this Draft Environmental Impact Report (EIR) for a copy of the NOP/IS and additional information regarding these issue areas:

- 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. Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site and is not listed on the Cortese Knox list. According to the State Water Resources Control Board (SWRCB), there are no Underground Storage Tanks (USTs) in the vicinity of the landfill. This environmental parameter is not proposed for further analysis in the Draft EIR.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school Magnolia Union Elementary School) is located 21 miles west of the Project site.
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site.

- Result in a safety hazard or excessive noise for people residing or working in an area located within an airport land use plan or, within two miles of a public airport or public use airport. The Project is not located within the Airport Land Use Compatibility Plan for Imperial County Airports (County of Imperial, 1996) or within two miles of a public airport or public use airport. The nearest public use airport, Holtville Airport, is located 14 miles southwest the project vicinity.

5.8.1. Environmental Setting

The GSPA is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the Project site is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County. The GSPA contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by the Bureau of Land Management (BLM). The GSPA is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California.

Directly northwest of the GSPA is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. Additionally, the Chocolate Mountain Aerial Gunnery Range (CMAGR) is located approximately 3 miles to the north of the GSPA. Within all of the various BLM lands surrounding the GSP, the BLM has designated Recreation Management Zones (RMZs) which dictate the allowable recreation activities within those areas and provide for BLM's management objectives within those areas.

Hazardous Materials Technical Study

A Hazardous Materials Technical Study (HMTS) was prepared for the proposed Project (Ninyo & Moore, 2020), which is included as Appendix K of this Draft EIR. The analysis contained in this section is based, in part on the findings of this technical report.

The HMTS consisted of a review and summary of publicly available federal, state, and local regulatory databases and historical resources. Historical and regulatory research was performed in August and September 2020. This report addresses existing environmental conditions at the site.

This HMTS included the activities listed below.

- Reviewed physical setting information (e.g., topographic and geologic maps, groundwater elevation data, etc.) for the site.
- Reviewed federal, state, and local regulatory agency databases for the site. The purpose of this review was to document the locations of facilities with unauthorized releases of

hazardous materials or wastes to soil and/or groundwater, as well as the regulatory status, where available.

- Reviewed fire insurance map, historical aerial photographs, and historical topographic maps to document, in general, areas at the site and vicinity that may have been historically developed with uses indicative of potential environmental concerns (e.g., agricultural, commercial, industrial, etc.).
- Reviewed the State Water Resources Control Board (SWRCB) GeoTracker website, the California Department of Toxic Substances Control (DTSC) EnviroStor website, and other regulatory online databases to supplement information in the database report.

Based upon the results of this HMTS, the following findings and opinions are provided.

- The Glamis Beach Store property has a closed unauthorized release case (7T2227016) associated with a release from an unspecified UST. The case was opened in June 1991 and closed in August 1992. The RWQCB and ICPHD were both contacted for additional information related to the closed unauthorized release case; however, the agencies did not have records for the case.
- Potential environmental concerns in the site vicinity include a petroleum pipeline operated by Kinder Morgan along the UPRR and commonly encountered environmental conditions associated with the railroad rights-of-way (ROW) including the potential for creosote-treated railroad ties and herbicides to be present in the immediate vicinity of the railroad. Based on the absence of a reported release from the fuel pipeline and distance from railroad tracks, these off-site potential issues are not a concern to the site at this time.

Wildland Fire

The GSPA is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial, n.d.). Additionally, according to the Draft Fire Hazard Severity Zone Map for Imperial County prepared by the California Department of Forestry and Fire Protection (CALFIRE), the GSPA is not located in or near state responsibility areas or lands classified as very high hazard severity zones (CALFIRE, 2007).

5.8.2. Regulatory Setting

A variety of federal, state, and local laws, regulations, and/or policies pertain to protection of public safety from hazardous materials and waste (including radioactive waste), wildfire, and disease vectors. These are described below.

Federal

United States Environmental Protection Agency (USEPA)

The U.S. Environmental Protection Agency (USEPA) provides leadership in the nation's environmental science, research, education, and assessment efforts. The USEPA works closely with other federal agencies, state and local governments, and Indian tribes to develop and enforce regulations under existing environmental laws. The USEPA is responsible for researching and setting national standards for a variety of environmental programs and delegates to states and tribes responsibility for issuing permits, and monitoring and enforcing compliance. Prior to August 1992, the principal agency of the federal level regulating the generation, transport, and disposal of hazardous waste was the EPA under the authority of the Resource Conservation and Recovery Act (RCRA). As of August 1, 1992, however, the California DTSC was authorized to implement the State's hazardous waste management for the USEPA.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 was enacted to create a management system to regulate waste from "cradle-to-grave." The USEPA states that RCRA's goals are to protect the public from harm caused by waste disposal, to encourage reuse, reduction, and recycling, and clean up spilled or improperly stored wastes. Waste management involves the collection, transportation, processing, recycling or disposal of waste materials. In response to the 1984 Hazardous and Solid Waste Amendments to the RCRA, the USEPA revised the *Criteria for Classification of Solid Waste Disposal Facilities and Practices* set forth in 40 Code of Federal Regulations (CFR) Part 257 and Part 258. Subtitle D of the RCRA addresses non-hazardous solid wastes, as well as certain hazardous wastes which are exempted from the Subtitle C regulations such as: hazardous wastes from households and from conditionally exempt small quantity generators. Subtitle D also includes national technical criteria (regulations) which include specific requirements for location, operation, design (liner, leachate collection, run-off controls, etc.), groundwater monitoring, corrective action, closure and post-closure care, and financial assurance responsibility. Subtitle D also fulfills EPA's mandate under Section 405(d) of the Clean Water Act, regulations governing the use and disposal of sewage sludge.

State

Safety and Health Regulations – California Occupational Safety and Health Administration

Workers who handle or come in contact with hazardous materials or potentially hazardous wastes or other workplace hazards are subject to worker safety requirements to protect employees. In both instances, site safety plans are mandatory as required by federal and state Occupational Safety and Health Administration (OSHA) requirements. Such site safety plans typically include provisions for safety training, safety equipment, accident and illness prevention programs, hazardous

substance exposure warnings, and emergency response and fire prevention plan preparation. The California OSHA (Cal/OSHA) is the State agency responsible for assuring worker safety in the handling and use of chemicals in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing state workplace safety regulations. Because the State of California has a federally approved OSHA program, it is required to, and has, adopted regulations that are at least as stringent as those found in Title 29 CFR.

Cal/OSHA regulations concerning the use of hazardous materials in the workplace, as detailed in Title 8 California Code of Regulations (CCR), include requirements for safety training, availability of safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces hazard communication program regulations that contain training and information requirements, including procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees at hazardous waste sites. The hazard communication program requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The *Hazardous Materials Release Response Plans and Inventory Act*, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a hazardous materials business plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

Assembly Bill (AB) 2948 (Tanner) – County Hazardous Waste Management Plans

In 1988, the State Assembly passed Assembly Bill (AB) 2948 in response to the growing concern regarding hazardous waste management in California (CalRecycle, 2012). AB 2948 enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction. The *Imperial County Hazardous Materials Area Plan* addresses the use, storage, and transportation of hazardous materials, as well as the generation and transportation of hazardous wastes and is discussed in more detail below.

Hazardous Waste Control Act

The *Hazardous Waste Control Act* created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Act is implemented by regulations contained in Title 22 CCR, *California Hazardous Waste Control Law*, which describes

the following required aspects for the proper management of hazardous waste: identification and classification; generation and transport; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements.

Department of Toxic Substance Control

The management of hazardous materials and waste within the State of California falls within the jurisdiction of the California Environmental Protection Agency (Cal-EPA) and the DTSC. DTSC regulates hazardous waste, cleans existing contamination, and looks for ways to reduce hazardous waste produced in California. DTSC's authority to regulate hazardous waste in California stems from USEPA authorization to carry out the federal RCRA of 1976. Additional authority is given to DTSC by the California Health and Safety Code. DTSC also oversees the implementation of the hazardous waste generator and on-site treatment program, which is one of six environmental programs implemented at the local level within the Certified Unified Program Authority (CUPA). There are 72 CUPAs, which are generally part of the local fire department or environmental health department, that have authority to enforce regulations, conduct inspections, administer penalties, and hold hearings. On January 1, 2005, the DTSC was authorized by the Cal/EPA as the Imperial County CUPA (DTSC, 2020).

Government Code Section 65962.5 (Cortese List)

The provisions in Government Code section 65962.5 are commonly referred to as the "Cortese List" (after the Legislator who authored the legislation that enacted it). The list, or a site's presence on the list, has bearing on the local permitting process as well as on compliance with the California Environmental Quality Act (CEQA). Because this statute was enacted over twenty years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented and, in some cases, the information to be included in the Cortese List does not exist. Government Code section 65962.5 was originally enacted in 1985, and per subsection (g), the effective date of the changes called for under the amendments to this section was January 1, 1992. While Government Code Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and this information is now largely available on the Internet sites of the responsible organizations. Those requesting a copy of the Cortese "list" are now referred directly to the appropriate information resources contained on the Internet web sites of the boards or departments that are referenced in the statute.

California Highway Patrol

The California Highway Patrol (CHP) is an agency of the State of California with patrol jurisdiction over all California highways. The CHP performs inspections of hazardous materials carriers and enforces hazardous materials transport regulations. The CHP under the Title 13 CCR,

Chapter 6, Hazardous Materials, and the CFR Title 49 regulates transport of hazardous materials. When a hazardous material/waste spill originates on a highway, the CHP is responsible for direction of cleanup and enforcement.

California Department of Transportation

Caltrans, CHP, and the Imperial County Department of Public Works (DPW) regulate transportation of hazardous materials. Drivers must have a hazardous materials endorsement to operate a commercial vehicle carrying hazardous materials. During the transporting of materials, a route map must be maintained that indicates safe routing and safe stopping places along the route.

Local

Imperial County General Plan Seismic and Public Safety Element

The Imperial County General Plan includes a "Seismic and Public Safety Element." The "Seismic and Public Safety Element" identifies potential natural and human-induced hazards and provides policy to avoid or minimize the risk associated with hazards. Potential hazards must be addressed in the land use planning process to avoid the unfolding of dangerous situations. The policies and implementation measures in the General Plan applicable to the Project are outlined in Table 5.8--1. In January 2021, the Imperial County Board of Supervisors voted to incorporate the updated Multi-Jurisdictional Hazard Mitigation Plan into the County's Seismic and Public Safety Element as an appendix.

Imperial County-Mexicali Emergency Response Plan

The Binational Prevention and Emergency Response Plan between Imperial County, California, and the city of Mexicali, Baja California, was established as part of a joint contingency plan (JCP) between the United States of America (U.S.) and Mexico. The JCP was signed in 1999 and provided a foundation for collaboration for the border area and the basis for preparedness, mitigation, response, and prevention of hazardous substances along the inland international boundary. A memorandum of understanding (MOU) was developed to reinforce the jurisdictional cooperation between the two nations. The MOU with the corresponding emergency preparedness and response plan was developed with the support of the USEPA (Imperial County, 2005).

Imperial County Multi-Jurisdictional Hazard Mitigation Plan Update

The Imperial County Multi-Jurisdictional Hazard Mitigation Plan (MHMP) Update was developed in partnership with the County of Imperial, the City of Brawley, the City of Calexico, the City of Calipatria, the City of El Centro, the City of Holtville, the City of Imperial, the City of Westmorland, the Imperial Irrigation District (IID), and the Imperial County Office of Education. This document is a comprehensive update to the updated MHMP from 2014. The purpose of the MHMP is to reduce death, injury, and disaster losses from both natural and human-caused disasters

in Imperial County through outlining goals, strategies, and actions regarding hazard mitigation (Imperial County, 2020).

Imperial County Hazardous Materials Area Plan

The Imperial County Hazardous Materials Area Plan addresses the use, storage, and transportation of hazardous materials, as well as the generation and transportation of hazardous wastes. The Hazardous Materials Area Plan identified the federal, State, and local agencies responsible for incidents involving the release or threatened release of hazardous materials. The primary responsibility and authority lie with the Incident Commander, who activates the responses consistent with the plan. The Hazardous Materials Area Plan also identifies the existing mutual aid agreements with Yuma County and the California Department of Forestry and Fire Protection (Cal Fire). Existing plans and documents that have also been taken into account include the Imperial County Emergency Operations Plan (EOP), the MHMP, the Imperial Valley Hazardous Emergency Assistance Team Joint Powers Agreement, and the U.S. – Mexico Environmental Program (November 2016).

Imperial County Office of Emergency Services – Emergency Operations Plan

The Imperial County Office of Emergency Services (OES) provides emergency management services for Imperial County including the seven cities/towns in the county as well as special districts. The OES coordinates emergency operations and develops plans for emergency preparedness, response, recovery and mitigation to natural/man-made disasters, and technological disasters. The Imperial County Fire Department (ICFD) is the local OES and is the lead agency for the Imperial County Operational Area (OA), in which the ICFD develops emergency management plans, conducts public education, establishes emergency operations center operations, and participates in interagency coordination (Imperial County, 2007). The OES serves as a liaison between the state and local government political subdivisions (California Emergency Services Act, Chapter 7, Division 1, Title 2).

Imperial County has developed an OA EOP which describes coordinated guidance and procedures to prepare for and respond to emergency risks. The EOP is consistent with the requirements of the Standardized Emergency Management System (SEMS), which is required by California Government Code Section 8607(a). All local government agencies are required to use SEMS when responding to multi-jurisdictional or multi-agency emergencies to be eligible for state reimbursement of response-related personnel costs. The EOP is also consistent with the requirements of the U.S. Department of Homeland Security National Incident Management System (NIMS), which is a national standardized methodology to incident management and response.

County of Imperial Fire Prevention and Explosives Ordinance

Imperial County has a Fire Prevention and Explosives Ordinance (Section 53101-53300), which provides regulations related to fire or explosion risks. The ordinance includes regulations related to the storage of flammable materials and radioactive materials; fireworks permits; and abatement standards for weeds and other vegetation.

TABLE 5.8-1 CONSISTENCY WITH GENERAL PLAN HAZARDOUS MATERIALS AND PUBLIC HEALTH GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Seismic and Public Safety Element		
Goal 1: Include public health and safety considerations in land use planning. • **Objective 1.8** Reduce fire hazards by the design of new developments.	Yes	The proposed Specific Plan is committed to protecting public health and safety by providing proposed zoning with compatible allowable uses, a Conceptual Site plan showing preferred land uses within a compatible physical arrangement. Future development within the Project site will be required to comply with California and County building codes, and seismic standards. Proposed development will be regulated within flood-way areas in accordance with the Federal Emergency Management Agency (FEMA). Avoidable seismic risks will be avoided. The proposed Specific Plan implements measures, commensurate with risks, to reduce injury, loss of life, destruction of property and disruption of service. Environmental hazards will be considered when siting critical proposed facilities within the Glamis Specific Plan Area (GSPA).
Goal 2: Minimize potential hazards to public health, safety, and welfare and prevent the loss of life and damage to health and property resulting from both natural and human-related phenomena. • **Objective 2.1** Ensure the adequacy of existing emergency preparedness and evacuation plans to deal with identified hazards and potential emergencies.	Yes	The proposed Specific Plan ensures that adequate emergency preparedness and evacuation plans to respond to identified hazards and potential emergencies by implementing additional hydrant connections within Vendor Row as well as, during Special Events, on-site law enforcement and fire protection will be provided with applicable services and apparatus (refer to Chapter II. Specific Plan, F. Public Safety Services). The proposed Specific Plan is appropriately regulated with applicable provisions including the Alquist – Priolo Special Studies Zone Act, California Building Code and Title 9 Division 15 of the County Land Use Ordinance. Furthermore, the proposed Specific Plan implements all site-specific recommendations set-forth in the Geotechnical Report prepared for the project. Additionally, signage will be strategically located throughout the GSPA to prevent unsafe crossings of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR). A proposed off highway vehicle (OHV)

TABLE 5.8-1 CONSISTENCY WITH GENERAL PLAN HAZARDOUS MATERIALS AND PUBLIC HEALTH GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
		and pedestrian under-crossing in the vicinity of SR-78 and the Glamis Mainstreet will be built in concert with the build-out of the project.
Goal 3: Protect the public from exposure to hazardous materials and wastes. • **Objective 3.1:** Discourage the transporting of hazardous materials/waste near or through residential areas and critical facilities. • **Objective 3.2:** Minimize the possibility of hazardous materials/waste spills. • **Objective 3.4:** Adopt and implement ordinances, policies, and guidelines that assure the safety of County ground and surface waters from toxic or hazardous materials and wastes.	Yes	Vehicle repair within the GSPA may result in accidental spillage and public exposure of hazardous materials and waste. Vehicle repair uses will be on raised impervious concrete pads to prevent public exposure and groundwater contamination of hazardous materials (as described in Chapter II, Section C, Subsection 4). If a use provides fuels or other hazardous material or repairs that include such fuels or material, the operator of such a space shall secure, in addition to any building permits that may be required the approval from the ICFD and shall meet all such regulations that may apply to such services (see Chapter. III, Section 93308.03).
Flood Hazards Policy 2: Regulate and restrict development near major water courses and floodplains through application of appropriate land use measures.	Yes	The proposed Specific Plan adheres to the regulations and restrictions proposed in the Seismic and Public Safety Element to implement procedures that avoids development near major water courses and floodplains.
Flood Hazards Policy 3: Both the ground floor elevation of any building for human occupancy and the driving surface, if designated evacuation routes within the 100-year floodplain, shall be constructed above the projected profile of a 100-year flood event.	Yes	The conceptual grading for the proposed Specific Plan is designed to meet the County of Imperial's drainage requirements, provide flood protection for future land uses within the entire GSPA and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with State drainage law. The GSPA will be graded so as to protect all building pads from the 100-year storm event and convey offsite flow in accordance with County of Imperial approval.
Flood Hazards Policy 4: Require all new development for human occupancy within the 100-year floodplain to be adequately flood-proofed.	Yes	All new permanent development within the GSPA is adequately flood-proofed.
Flood Hazards Policy 5: Establish technical design criteria which minimizes or mitigates impacts associated with crossing of floodplains by development. Unless such engineering alternatives are implemented, development in floodplains is to be restricted or prohibited.	Yes	The GSPA follows technical design criteria that either minimizes or mitigates impacts associated with crossing of floodplains by development. Future development of structures in floodplains is to be avoided.

Source: County of Imperial, n.d, 1997

5.8.3. Analysis of Project Effects and Significance Determination

The potential impacts associated with the proposed Specific Plan are evaluated on a qualitative basis through a comparison of existing conditions within the Project site and the anticipated proposed Specific Plan effects. The potential for impacts to hazards/hazardous materials would exist if the effect described under the criteria below occurs. The evaluation of proposed Specific Plan impacts is based on the significance criteria adopted by Imperial County, which the County has determined to be appropriate criteria for this Draft EIR.

Guidelines for Determination of Significance

The proposed Specific Plan would be considered to have a significant impact if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
2. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
3. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Analysis

Impact 5.8-1: Would the Project result in the creation of a significant public hazard from the routine transport, use, or disposal of hazardous materials?

The GSPA is characterized as an area of open desert consisting of several adjoined one- and two-story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store. Additionally, there is a separate seasonal off highway vehicle (OHV) repair business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower is located at the southeast portion of the property. Due south is an apartment, large recreational vehicle storage garage, and other related equipment storage buildings. Additionally, a dilapidated pre-fabricated residential structure is located on the southeast corner of the GSPA. To the west, on the opposite side of the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Lastly, on the northeast side of the GSPA, crossing the Union Pacific Railroad, there are two triangular parcels that are currently vacant. The proposed Specific Plan would not require the limited transport, storage, and use of fuels, polymer-based sealants, and other fluids for the fueling/servicing of construction equipment. These practices are already in place for current operations and the proposed Specific Plan would not substantially increase the transport or use of hazardous materials above current levels.

Transportation, storage, and disposal/recycling of such products are extensively regulated at the local, state and federal levels. Current and future construction and operations are, and will be, required to be in compliance with these regulations. The current inventory of chemicals on site are not expected to increase markedly as a result of the proposed Specific Plan. Because operations would be similar to current operations, impacts would be less than significant.

Impact 5.8-2: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Implementation of the proposed Specific Plan would generate construction trips and the potential for temporary roadway lane closures during construction of proposed traffic improvements, which could temporarily affect an emergency response or evacuation plan.

Impact 5.8-3: Expose people or structures to a significant risk of loss, injury or death involving wildland fires?

The GSPA is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial, n.d.). This is considered a less than significant impact and no mitigation would be required.

5.8.4. Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

5.9 Hydrology/Water Quality

This section addresses potential hydrology and water quality resource impacts that may result from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the Glamis Specific Plan Area, identifies applicable regulations, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential impacts to geology, soils, and paleontological resources was derived from of the following sources,

- *Geotechnical Engineering Feasibility Report* prepared by Earth Systems Pacific (August 2019: Appendix G), and
- *Hazardous Materials Technical Study* prepared by Ninyo and Moore (Ninyo and Moore 2020, Appendix I).

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. The following issues related to hydrology and water quality were raised by the California Department of Fish and Wildlife (CDFW) and the California Department of Transportation (Caltrans) and are addressed in this section:

- A discussion of … Project related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
- Based on review of material submitted with the NOP and review of aerial photography, the Project may be subject to Notification to CDFW pursuant to Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.
- Provide a letter from the Floodplain Administrator stating that this project has no rise or a letter showing coordination with the Floodplain Administrator.
- The Specific Plan’s Conceptual Grading and Drainage Plan is insufficient:

  - Provide existing topographic information with labels (typically 0.1' contours in the desert areas).
  - Provide proposed topographic information with labels (typically 0.1' contours in the desert areas).
  - Both maps/exhibits must clearly show the drainage patterns along SR-78, which in the current figure is not visible at all.
- Coordinate with Caltrans' Survey Branch to obtain Caltrans R/W and SR-78 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing SR-78.
- Provide information on the maps/exhibits to show how the conceptual offsite drainage will cross the Ted Kipf Road along SR-78. Additional runoff coming from the culvert at northeast side of the site will have potential impact to the existing Caltrans drainage inlet located at the southwestern side of the project.
- Hydrology and Hydraulics Study may be required to determine the effect of the proposed project to the existing drainage system in the area.

5.9.1. Environmental Setting

The GSPA is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the Project site is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County. The Project site contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by the Bureau of Land Management (BLM). The Project site is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California.

Directly northwest of the Project site is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. Additionally, the Chocolate Mountain Aerial Gunnery Range (CMAGR) is located approximately 3 miles to the north of the Project site. Within all of the various BLM lands surrounding the GSP, the BLM has designated Recreation Management Zones (RMZs) which dictate the allowable recreation activities within those areas and provide for BLM's management objectives within those areas.

Localized Draining Conditions

As shown in Figure 4-5, *Existing Drainage*, the existing topography and drainage of the GSPA generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the GSPA (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR. The drainage flows from

these three concrete culverts underneath the UPRR, flow through and/or around portions of the existing GSPA (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All planning areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

Flooding

The Project site lies within two designated Federal Emergency Management Agency (FEMA) Flood Zones: A and X (see Figure 5.6-4, *Zone A Flood Boundary*) Zone "A" is defined as "Without Base Flood Elevation" and Zone "X" is defined as "Areas of 0.2% annual chance floodplain; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood." These zones are defined on FEMA Map Number 06025C1125C and 06025C1475C both effective 9/26/2008. As shown on Figure 5.6-4, the Project site is in an area where sheet and concentrated flow and erosion could occur (Earth Systems Pacific, 2019).

Aerial photos depict a natural storm channel erosion (dry stream beds) present in the middle of the GSPA and south of the Glamis Beach store. Therefore, uncontrolled concentrated flows may exist at or near the GSPA and debris flow may occur (Earth Systems Pacific, 2019).

Surface Water

A stormwater channel runs through a small portion of the northeast GPSA which is channeled under the railroad track. On the southeast portion, a wash is piped under SR 78. Several established washes and ephemeral washes were observed within Planning Areas 1 and 3 (Barrett Biological, 2019).

Groundwater

Depth to Groundwater

Free groundwater was not encountered in borings or test pits during explorations conducted in January of 2019. Boring depths exceeded 50 feet below the ground surface. Moisture contents observations of the soils indicate the soils are dry to moist (Earth Systems Pacific, 2019).

Perched Water Table

By definition, perched ground water conditions were not observed during our exploration. Observations did not indicate "wet" soils meaning free water was noted on the soil. Impermeable type soils (generally clay) were not found at depths ranging from the ground surface to 50 feet below ground surface (bgs). Moisture contents performed in the lab indicated values between 1 percent and 9 percent, which indicates degrees of saturation less than approximately 50 percent (Earth Systems Pacific, 2019).

Based on the information provided above, it is anticipated that the current depth of groundwater below the GSPA surface is over 100 feet. Groundwater levels may fluctuate with precipitation, irrigation, drainage, regional pumping from wells, site grading, and nearby faults (Earth Systems Pacific, 2019).

According to the Water Supply Assessment (Appendix K) prepared in support of this Draft EIR, groundwater levels in the vicinity of the GSPA have been influenced by the presence of the canal systems, including the Coachella Canal, East Highline Canal, and associated laterals and drains. Seepage from the unlined Coachella Canal created a groundwater mound in the shallow alluvial aquifer of East Mesa, with water levels rising over 70 feet in some areas (Dubose, 2020). Groundwater level decline in the vicinity of the Coachella Canal has been monitored since the late 1970s when the first 49 miles of the earthen canal channel was replaced with a concrete channel. United States Geological Survey (USGS) well 11S/15E-23M, which is approximately nine (9) miles southeast of the proposed well, shows an asymptomatic groundwater level decline from 20.68 feet bgs in 1979 to approximately 50 feet bgs at present. The water level elevations as of March 2020 were approximately 70 feet above mean sea level (AMSL). No groundwater levels have been reported along the Coachella Canal section that was lined in the late 2000s. However, a similar asymptotic decline could be expected. Groundwater levels in Imperial Valley have been historically measured at two multi-level wells located approximately 6.5 to 7.5 miles southwest of the GSPA. Water levels at these locations were within 10 feet of the ground surface in 1989. The groundwater elevation at that time was approximately 215 feet below mean sea level (bmsl). Groundwater levels in the irrigated areas have been controlled by the drain systems (Dubose, 2020). Current groundwater levels, although sparse, generally agree with historical groundwater elevation distributions. Groundwater elevations are higher in mountainous areas and East Mesa and decline towards Imperial Valley and the Salton Sea. This distribution of groundwater elevations suggests groundwater flow directions roughly coincide with topography. However, the flow of groundwater and distribution of groundwater levels is likely influenced by faults, which act as barriers, and changes in transmissivity.

The GSPA is located in the Amos Valley Groundwater Basin which is part of the East Mesa Groundwater Management Planning Area. The groundwater aquifer in the GSPA is estimated to have a capacity of approximately 1-to-1.5-million-acre feet (MAF) per year.

5.9.2. Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

Federal

Clean Water Act

The U.S. Environmental Protection Agency (USEPA) is the lead federal agency responsible for managing water quality. The Clean Water Act (CWA) of 1972 is the primary federal law that governs and authorizes the USEPA and the states to implement activities to control water quality. The various elements of the CWA that address water quality and that are applicable to the project is discussed below. Wetland protection elements administered by the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA, including permits for the discharge of dredged and/or fill material into waters of the U.S., are discussed in Section 5.3, Biological Resources.

Under federal law, the USEPA has published water quality regulations under Volume 40 of the Code of Federal Regulations (CFR). Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the U.S. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question; and (2) criteria that protect the designated uses. Section 304(a) requires the USEPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. The USEPA is the federal agency with primary authority for implementing regulations adopted under the CWA. The USEPA has delegated the State of California the authority to implement and oversee most of the programs authorized or adopted for CWA compliance through the Porter-Cologne Water Quality Control Act of 1969, described below.

Under CWA Section 401, applicants for a federal license or permit to conduct activities that may result in the discharge of a pollutant into waters of the U.S. must obtain a water quality certification from the State Water Resources Control Board (SWRCB) in which the discharge would originate or, if appropriate, from the interstate water pollution control agency with jurisdiction over affected waters at the point where the discharge would originate.

CWA Section 402 establishes the National Pollutant Discharge Elimination System (NPDES) permit program to control point source discharges from industrial, municipal, and other facilities if their discharges go directly to surface waters. The 1987 amendments to the CWA created a new section of the CWA devoted to regulating storm water or nonpoint source discharges (Section 402[p]). The EPA has granted California primacy in administering and enforcing the provisions of the CWA and the NPDES program through the SWRCB. The SWRCB is responsible for issuing both general and individual permits for discharges from certain activities. At the local and regional levels, general and individual permits are administered by Regional Water Quality Control Boards (RWQCBs).

Clean Water Act Section 303(d) Impaired Waters List

CWA Section 303(d) requires states to develop lists of water bodies that will not attain water quality standards after implementation of minimum required levels of treatment by point-source dischargers. Section 303(d) requires states to develop a total maximum daily load (TMDL) for each of the listed pollutants and water bodies. A TMDL is the amount of loading that the water body can receive and still be in compliance with applicable water quality objectives and applied beneficial uses. TMDLs can also act as a planning framework for reducing loadings of a specific pollutant from various sources to achieve compliance with water quality objectives. TMDLs prepared by the state must include an allocation of allowable loadings to point and nonpoint sources, with consideration of background loadings and a margin of safety. The TMDL must also include an analysis that shows links between loading reductions and the attainment of water quality objectives.

Surface waters in the Imperial Valley Planning Area mostly drain toward the Salton Sea. The New and Alamo Rivers convey agricultural irrigation drainage water from farmlands in the Imperial Valley, surface runoff, and lesser amounts of treated municipal and industrial waste waters from the Imperial Valley. The flow in the New River also contains agricultural drainage, treated and untreated sewage, and industrial waste discharges from Mexicali, Mexico. The impaired water bodies listed on the 303(d) list for the New River Basin include the Imperial Valley Drains (managed by the Imperial Irrigation District [IID]), New River, and the Salton Sea. Further discussion of specific pollutant listings is provided on Table 5.9-1.

TABLE 5.9-1 303(d) WATERBODY IMPAIRMENTS

Water Body	Impairments
Imperial Valley Drains	
• Chlordane	• PCBs (Polychlorinated biphenyls)
• Chlorpyrifos	• Sedimentation/Siltation
• DDT (Dichlorodiphenyltrichloroethane)	• Selenium
• Dieldrin	• Toxaphene
• Imidacloprid	• Toxicity
New River (Imperial County)	
• Ammonia	• Imidacloprid
• Bifenthrin	• Indicator Bacteria
• Chlordane	• Malathion
• Chloride	• Mercury
• Chlorpyrifos	• Naphthalene
• Cyhalothrin, Lambda	• Nutrients
• Cypermethrin	• Organic Enrichment/Low Dissolved Oxygen
• DDD (Dichlorodiphenyldichloroethane)	• PCBs (Polychlorinated biphenyls)
• DDT (Dichlorodiphenyltrichloroethane)	• Sediment

TABLE 5.9-1 303(d) WATERBODY IMPAIRMENTS

Water Body	Impairments
Imperial Valley Drains	
• Diazinon	• Selenium
• Dieldrin	• Toxaphene
• Disulfoton	• Toxicity
• Hexachlorobenzene/ HCB	• Trash
Salton Sea	
• Ammonia	• Enterococcus
• Arsenic	• Low Dissolved Oxygen
• Chloride	• Nutrients
• Chlorpyrifos	• Salinity
• DDT (Dichlorodiphenyltrichloroethane)	• Toxicity

Source: SWRCB, Statewide Section 303(d)List, 2018.

Federal Emergency Management Agency/Executive Order 11988 – Floodplain Management

Executive Order (EO) 11988 directs federal agencies to avoid, to the extent practicable and feasible, short- and long-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever a practicable alternative can be found. Further, EO 11988 requires the prevention of uneconomic, hazardous, or incompatible use of floodplains; protection and preservation of the natural and beneficial floodplain values; and consistency with the standards and criteria of the National Flood Insurance Program (NFIP). The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques and Federal Emergency Management Agency (FEMA) floodplain mapping.

The FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations that limit development in floodplains. FEMA also issues flood insurance rate maps (FIRM) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection covered by the FIRMs is established by FEMA, with the minimum level of flood protection for new development determined to be the 1-in-100 (0.01) annual exceedance probability [AEP]) (i.e., the 100-year flood event).

For projects that would, upon construction, affect the hydrologic or hydraulic characteristics of a flooding source and, thus, result in the modification of the existing regulatory floodway, effective Base Flood Elevations (BFEs), SFHA, or conditional letter of map revision (CLOMR) would need to be prepared and approved by the California Department of Transportation (Caltrans), the County, and FEMA prior to any work occurring.

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 state's waters. 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 Water Quality Control Act of 1969 regulates both surface water and groundwater.

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 Basin 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. According to the Basin Plan the beneficial uses established for the Imperial Valley Drains, which include the Westside Main Canal, New River, and the Salton Sea include: industrial service supply; freshwater replenishment; water contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; preservation of rare, threatened, or endangered species; and aquaculture.

California Fish and Wildlife Code, Section 1602

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation pursuant to Section 1602 of the California Department of Fish and Game Code. Section 1602 makes it unlawful for an entity (i.e., any person, state, or local governmental agency or public utility) to substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake without first notifying the California Department of Fish and Wildlife (CDFW) of such activity. The regulatory definition of a stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation. CDFW's jurisdiction within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A CDFW Streambed Alteration Agreement (SAA) must be obtained for any project that would result in an impact to a river, lake, or stream that would adversely affect any fish or wildlife resource.

California Toxics Rule

Under the California Toxics Rule, the USEPA has proposed water quality criteria for priority toxic pollutants for inland surface waters, enclosed bays, and estuaries. These federally promulgated criteria create water quality standards for California waters. The California Toxics Rule satisfies CWA requirements and protects public health and the environment.

National Pollutant Discharge Elimination System (NPDES) General Industrial and Construction Permits

The NPDES General Industrial Permit requirements apply to the discharge of stormwater associated with industrial sites. The permit requires implementation of management measures that will achieve the performance standard of the best available technology economically achievable and best conventional pollutant control technology.

Under the statute, operators of new facilities must implement industrial best management practices (BMPs) in a storm water pollution prevention plan (SWPPP) and perform monitoring of stormwater discharges and unauthorized non–stormwater discharges. Construction activities are regulated under the NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit) which covers stormwater runoff requirements for projects where the total amount of ground disturbance during construction exceeds 1 acre. Coverage under a General Construction Permit requires the preparation of a SWPPP and submittal of a Notice of Intent (NOI) to comply with the General Construction Permit. The SWPPP includes a description of BMPs to minimize the discharge of pollutants from the sites during construction. Typical BMPs include temporary soil stabilization measures (e.g., mulching and seeding), storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or stormwater, and using filtering mechanisms at drop inlets to prevent contaminants from entering storm drains. Typical post construction management practices include street sweeping and cleaning stormwater drain inlet structures. The NOI includes site-specific information and the certification of compliance with the terms of the General Construction Permit.

Local

County of Imperial Land Use Ordinance, Title 9

The County's Ordinance Code provides specific direction for the protection of water resources and for the minimization of losses due to flood conditions. Applicable ordinance requirements are summarized below and are contained in Division 10, Building, Sewer, and Grading Regulations, and Division 16 - Flood Damage Prevention Regulations.

Chapter 10 – Grading Regulations. Section 91010.02 of the Ordinance Code outlines conditions required for issuance of a Grading Permit. These specific conditions include:

1. If the proposed grading, excavation or earthwork construction is of irrigatable land, that said grading will not cause said land to be unfit for agricultural use.

2. The depth of the grading, excavation or earthwork construction will not preclude the use of drain tiles in irrigated lands.

3. The grading, excavation or earthwork construction will not extend below the water table of the immediate area.

4. Where the transition between the grading plane and adjacent ground has a slope less than the ratio of 1.5 feet on the horizontal plane to 1 foot on the vertical plane, the plans and specifications will provide for adequate safety precautions.

Chapter 16 – Flood Damage Prevention Regulations. Section 91604.00 of the Ordinance Code specifies that a development permit shall be obtained before construction or development begins within any area of special flood hazards. It also outlines the conditions for issuance of the Floodplain Development Permit.

1. All development permits must be reviewed by the Flood Administrator to determine that the permit requirements of this ordinance have seen satisfied.

2. All other required State and Federal permits have been obtained.

3. The site is reasonably safe from flooding.

4. The proposed development does not adversely affect the carrying capacity of areas where base flood elevations have been determined, but a floodway has not been designated. For purposes of this ordinance, "adversely affects" means that the cumulative effect of the proposed development when combined with all other existing and anticipated development will not increase the water surface elevation of the base flood more than one foot at any point.

Chapter 5 of Division 16 includes construction standards for all development within special floor hazard areas.

Imperial County Engineering Guidelines Manual

Based on the guidance contained in the County's Engineering Guidelines Manual, the following drainage requirements would be applicable to the Glamis Specific Plan.

III A. GENERAL REQUIREMENTS

1. All drainage design and requirements are recommended to be in accordance with the IID "Draft" Hydrology Manual or other recognized source with approval by the County Engineer

and based on full development of upstream tributary basins. Another source is the Caltrans I-D-F curves for the Imperial Valley.

2. Public drainage facilities shall be designed to carry the 10-year, 6-hour storm underground, the 25-year storm between the top of curbs provided two 12-foot minimum width dry lanes exist and the 100-year frequency storm between the right-of-way lines with at least one 12-foot minimum dry lane open to traffic. All culverts shall be designed to accommodate the flow from a 100-year frequency storm.

3. Permanent drainage facilities and right-of-way (ROW), including access, shall be provided from development to point of satisfactory disposal.

4. Retention volume on retention or detention basins should have a total volume capacity for a 3-inch minimum precipitation covering the entire site with no C reduction factors. Volume can be considered by a combination of basin size and volume considered within parking and/or landscaping areas. There is no guarantee that a detention basin outletting to an IID facility or other storm drain system will not back up should the facility be full and unable to accept the project runoff. This provides the safety factor from flooding by ensuring each development can handle a minimum 3-inch precipitation over the project site.

5. Retention basins should empty within 72 hours and no sooner than 24 hours in order to provide mosquito abatement. Draining, evaporation or infiltration, or any combination thereof can accomplish this. If this is not possible then the owner should be made aware of a potential need to address mosquito abatement to the satisfaction of the Imperial County Public Health Department. Additionally, if it is not possible to empty the basin within 72 hours, the basin should be designed for 5 inches, not 3 inches as mentioned in Item #4 above. This would allow for a saturation condition of the soil because of a 5-inch storm track. EHS must review and approve all retention basin designs prior to Imperial County Department of Public Works (DPW) approval. Nuisance water must not be allowed to accumulate in retention basins. The Imperial County Public Health Department may require a nuisance water abatement plan if this occurs.

6. The minimum finish floor elevation shall be 12 inches above top of fronting street curb unless property is below street level and/or 6 inches above the 100-year frequency storm event or storm track. A local engineering practice is to use a 5-inch precipitation event as a storm track in the absence of detailed flood information. The 100-year frequency storm would be required for detention calculations.

7. Finish pad elevations should be indicated on the plans, which are at or above the 100-year frequency flood elevation identified by the engineer for the parcel. Finish floor elevations should be set at least 6 inches above the 100-year flood elevation.

8. The developer shall submit a drainage study and specifications for improvements of all drainage easements, culverts, drainage structures, and drainage channels to the DPW for approval. Unless specifically waived herein, required plans and specifications shall provide a drainage system capable of handling and disposing of all surface waters originating within the subdivision and all surface waters that may flow onto the subdivision from adjacent lands. Said drainage system shall include any easements and structures required by the DPW or the affected Utility Agency to properly handle the drainage on site and off site. The report should detail any vegetation and trash/debris removal, as well as address any standing water.

9. Hydrology and hydraulic calculations for determining the storm system design shall be provided to the satisfaction of the Director, DPW. When appropriate, water surface profiles and adequate field survey cross-section data may also be required.

10. An airtight or screened oil/water separator or equivalent is required prior to permitting on-site lot drainage from entering any street right of way or public storm drain system for all industrial/commercial or multi residential uses. A maximum 6-inch drain lateral can be used to tie into existing adjacent street curb inlets with some exceptions. Approval from the DPW is required.

11. The County is implementing a storm water quality program as required by the SWRCB, which may modify or add to the requirements and guidelines presented elsewhere in this document. This can include ongoing monitoring of water quality of storm drain runoff, implementation of BMPs to reduce storm water quality impacts downstream or along adjacent properties. Attention is directed to the need to reduce any potential of vectors, mosquitoes, or standing water.

12. A Drainage Report is required for all developments in the County. It shall include a project description, project setting including discussions of existing and proposed conditions, any drainage issues related to the site, summary of the findings or conclusions, off-site hydrology, onsite hydrology, hydraulic calculations and a hydrology map.

County of Imperial General Plan

Because of the economic, biological, and agricultural significance water plays in the Imperial County, the Water Element and the Conservation and Open Space Element of the General Plan contain policies and programs, created to ensure water resources are preserved and protected. Table 5.9-2 identifies General Plan policies and programs for water quality and flood hazards that are relevant to the project and summarizes the project's consistency with the General Plan. While this EIR analyzes the project's consistency with the General Plan pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 5.9-2 CONSISTENCY WITH GENERAL PLAN WATER AND HYDROLOGY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Water Element		
Goal 1: The County will secure the provision of safe and healthful sources and supplies of domestic water adequate to assure the implementation of the County General Plan and the long-term continued availability of this essential resource. • **Objective 1.1:** The efficient and cost-effective utilization of local and imported water resources through the development and implementation of urban use patterns. • **Objective 1.2:** Cooperation between the Cities and County for the need to maintain, upgrade, and expand domestic water and sewage treatment facilities of the communities within the County, the need for the implementation of appropriate development fees, and the	Yes	As part of the proposed Specific Plan the applicant would seek a conditional use permit (CUP) for a new public water system well that would be able to pump up to 25 AF per year. As new development is implemented, this wastewater plant will be expanded as determined by the regulatory agencies.
Water Element (Continued)		
raising of service fees to off-set limited public financial resources. **Objective 1.3:** The efficient regulation of land uses that economizes on water consumption, enhances equivalent dwelling unit demand for domestic water resources, and that makes available affordable resources for continued urban growth and development.		
Goal 2: Long-term viability of the Salton Sea, Colorado River, and other surface waters in the County will be protected for sustaining wildlife and a broad range of ecological communities. • **Objective 2.2** A balanced ecology associated with the riparian and ruderal biological communities important as breeding and foraging habitats for native and migratory birds and animals occurring within the County. • **Objective 2.3** Preservation of riparian and ruderal habitats as important biological filters as breeding and foraging habitats for native and migratory birds and animals.	Yes	Riparian habitat and wetlands are not present on the Glamis Specific Plan Area (GSPA).

TABLE 5.9-2 CONSISTENCY WITH GENERAL PLAN WATER AND HYDROLOGY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Goal 4: The County will adopt and implement ordinances, policies, and guidelines that assure the safety of County ground and surface waters from toxic or hazardous materials and wastes. • **Objective 4.2** The provision of safe and efficient community wastewater treatment facilities which adequately service the present and future needs of residential, commercial, and industrial development within the Imperial Irrigation District service area.	Yes	The development and implementation of infrastructure abides by the ordinances, policies, and guidelines that reduce contamination and assure the safety of County ground and surface waters from toxic or hazardous materials and wastes. Therefore, the GSP is consistent with and results in the implementation of, this policy of the General Plan.
Conservation and Open Space Element		
Goal 2: The County will integrate programmatic strategies for the conservation of critical habitats to manage their integrity, function, productivity, and long-term viability. • **Objective 2.6:** Attempt to identify, reduce, and eliminate all forms of	Yes	Riparian habitat and wetlands are not present on the GSPA.
Conservation and Open Space Element (Continued)		
pollution; including air, noise, soil, and water.		
Goals 6: The County will conserve, protect, and enhance water resources in the County. • **Objective 6.1:** Ensure the use and protection of all the rivers, waterways, and groundwater sources in the County for use by future generations. • **Objective 6.2**: Ensure proper drainage and provide accommodation for storm runoff from urban and other developed areas in manners compatible with requirements to provide necessary agricultural drainage. • **Objective 6.3:** Protect and improve water quality and quantity for all water bodies in Imperial County. • **Objective 6.4:** Eliminate potential surface and groundwater pollution through regulations as well as educational programs. • **Objective 6.7:** Prohibit the inappropriate siting of solid or hazardous waste facilities next to water bodies or over sources of potable groundwater or	Yes	The conceptual grading plan for the GSPA provides flood protection for future land uses within the entire GSPA and would release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with California drainage law. The on-site design northeast of the Union Pacific Railroad (UPRR) will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-direct the drainage around each of the planning areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for Planning Area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of State Route 78 (SR-78). Each of these earthen

TABLE 5.9-2 CONSISTENCY WITH GENERAL PLAN WATER AND HYDROLOGY GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
recharge basins. In association with the cleanup of the New River, all existing landfills in or near the river should eventually be closed. • **Objective 6.8:** Discourage the use of hazardous materials in areas of the County where significant water pollution could pose hazards to humans or biological resources. • **Objective 6.9:** Identify and protect watersheds and key recharge areas for the protection of water quality and groundwater. • **Objective 6.10:** Encourage water conservation and efficient water use among municipal and industrial water users, as well as reclamation and reuse of wastewater. • **Objective 6.11**: Coordinate with the appropriate agencies for the availability of water to meet future domestic, industrial/commercial and agricultural needs.		channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the Southwest under the UPRR, via existing concrete culverts. The proposed Project would protect water quality during construction through compliance with National Pollutant Discharge Elimination System (NPDES) General Construction Permit, storm water pollution prevention plan (SWPPP), and best management practices (BMPs). Design features and BMPs have also been identified to address water quality for the project. Water quantity would be maintained for the proposed Specific Plan by retaining the majority of the GSPA with pervious surfaces. Although the proposed Specific Plan may not improve water quality and quantity, it would protect existing conditions and satisfy County requirements. Therefore, the proposed Specific Plan is consistent with this objective.
Program: Structural development normally shall be prohibited in the designated floodways. Only structures which comply with specific development standards (Flood Drainage Prevention Regulation, Division 6) should be permitted in the floodplain.	Yes	The project has a very small residential component, and it would it place housing or other structures within a 100-year flood hazard area.
Land Use Element		
Goal 9: Identify and preserve significant natural, cultural, and community character resources and the County's air and water quality. • **Objective 9.2:** Reduce risk and damage from flood hazards by appropriate regulations.	Yes	The proposed Specific Plan has a very small residential component, and it would it place housing or other structures within a 100-year flood hazard area.

Sources: County of Imperial, 1997, 2015, 2016.

5.9.3. Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
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 result in substantial erosion or siltation on- or off-site?
4. 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
5. 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?
6. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
7. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Analysis

Impact 5.9-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction

A stormwater channel runs through a small portion of the northeast section of the GSPA which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes were observed within the Planning Areas 1 and 3 (Barrett Biological, 2019). Implementation of the GSP would include demolition of the existing structures, site preparation, construction of new buildings, as well as infrastructure improvements including water, wastewater, transportation and renewable energy facilities (see Tables 4-3A and 4-3B). Demolition of existing structures, grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality. However, the use of construction BMPs implemented as part of a SWPPP as required by the State Water Resources Control Board would avoid potential water quality degradation of receiving waters. All future development within the GSPA would require project-specific BMPs and a SWPPP as well, which are implemented as part of the County's construction permitting process.

Groundwater was not encountered in borings or test pits during explorations conducted in January of 2019. Boring depths exceeded 50 feet from the ground surface. Moisture contents observations of the soils indicate the soils are dry to moist. By definition, perched ground water conditions were not observed during exploration. Observations did not indicate "wet" soils meaning free water was noted on the soil. Impermeable type soils (generally clay) were not found at depths ranging from the ground surface to 50 feet bgs. Moisture contents performed in the lab indicated values between 1 percent and 9 percent, which indicates degrees of saturation less than approximately 50 percent (Earth Systems Pacific, 2019). Thus, the introduction of these materials into groundwater resources through percolation or inundation would result in less than significant water quality impacts.

The potential to create substantial erosion and siltation or violate any water quality standards or waste discharge requirements is considered significant. With implementation of Mitigation Measures (MMs) HWQ-1, 2, 3 and 4 impacts would be less than significant.

Operation

Implementation of MM HYQ-2 would require the Project to incorporate post-construction BMPs into the Project's final drainage plan that would include but would not be limited to, source control, and treatment control BMPs. Impacts would be reduced to less than significant with mitigation.

The proposed Specific Plan allows for the expansion of the existing wastewater treatment plant. Future wastewater treatment needed (i.e., secondary and tertiary treatment) will be determined by the amount of wastewater forecasted to be generated by each phase of structural improvement. Please see Section 5.15 of the EIR for a discussion of wastewater generation. Potential discharges could be wastewater generated by the Glamis Beach Store, restaurant and bar which is currently being discharged into an existing septic tank located near to those buildings and potential discharges related to the water and wastewater treatment systems.

The Imperial County Public Health Department coordinates with the Colorado River RWQCB to permit Onsite Wastewater Treatment Systems (OWTSs) on new development projects. An OWTS permit from the Public Health Department would be required prior to the construction of the on-site septic leach field system proposed to support the O&M building.

The Project site lies within Imperial Valley groundwater basin but is outside the basin's areas of special concern for high nitrate levels (PHD 2015). Approval of an OWTS permit from the County for the septic system would require compliance with requirements identified in the Local Agency Management Programs (LAMP) and reduce potential impacts on water quality standards, waste discharge, or degradation of surface or groundwater quality to a less than significant level.

A Reverse Osmosis Water Treatment Plant is currently located onsite. Residual material from this facility is mostly liquids with solids and is discharged to a holding tank. The residual liquid is used for dust suppression. A public water system permit is expected to be issued in the Spring of 2023 by the Imperial County Public Health Department Division of Environmental Health. An NPDES permit is currently not required but may be required in the future, as the volume of water produced increases.

Impact 5.9-2: 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?

As described in Section 3.1.1 of the EIR, the GSPA is developed with existing uses and the area around the Glamis Beach store is paved or otherwise contains impervious surfaces. While implementation of the GSP would increase development in the area, it would also include landscaped areas and would retain the stormwater channel within the northeast section of the GSPA, the wash under SR-78, along with the established washes and ephemeral washes within Planning Areas 1 and 3. The Project is not anticipated to substantially interfere with groundwater recharge.

Water supplies for existing uses within the GSPA are currently provided obtained from the Amos Valley Groundwater Basin by an existing on site well (CUP #13-0059). This well is designed specifically for domestic water use to serve a residence and its ancillary buildings. This well was constructed to domestic water well standards and cannot be used as a potable water source for the larger project area. It is currently authorized to pump 1.5 acre-feet (AF) per year. There is one

permitted public water system well (CUP #13-0060) that supplies water to the yet to be permitted Glamis Beach Store public water system, System No. 1300684. It also is currently authorized to pump 1.5 AF per year. As part of the proposed Specific Plan the applicant would seek a CUP for a new public water system well that would be able to pump up to 25 AF per year.

According to the Water Supply Assessment (WSA) (Appendix K) prepared in support of this EIR, water demand for Phase One is approximately 19.93 AF over a three-year period of construction (6.64 AF annually for three years) and 10.66 AF annually for operational use. During the first three years of Phase One the Applicant would be using 17.3 AF per year. Once construction is completed this amount would be reduced to 10.66 AF per year. This assumes the demand would be year-round, however, the project would only require this amount on a seasonal basis so the anticipated demand would be less than half this amount. Special events would bring in water from outside the Project site and would not utilize groundwater from wells. Development of Phases Two through Four would only result in minor increases in the overall annual use. Overall annual use would be less than the 25 AF the Applicant is asking for in their revised CUP. Given the basin's recharge is 200 AF per year the Project would not substantially decrease groundwater supplies and impacts would be less than significant.

Impact 5.9-3a: 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 result in substantial erosion or siltation on- or off-site?

A stormwater channel runs through a small portion of the northeast portion of the GSPA which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes were observed within the Planning Areas 1 and 3 (Barrett Biological, 2019). According to the Conceptual Drainage and Grading Plan Element of the proposed Specific Plan, the existing topography and drainage of the GSPA generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the GSPA (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR). The drainage flows from these three concrete culverts underneath the UPRR, flow through and/or around portions of the existing GSPA (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All planning areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

Grading for the proposed Specific Plan would provide flood protection for future land uses within the entire GSPA and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with California drainage law. The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-

direct the drainage around each of the planning areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for Planning area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR-78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the Southwest under the UPRR, via existing concrete culverts.

With implementation of Mitigation Measures (MMs) HWQ-1, 2, 3 and 4 erosion and sedimentation impacts would be less than significant.

Impact 5.9-3b: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

See response to Impact 5.9-3a.

Impact 5.9-3c: 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 create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

Construction and Operation

Portions of the GSPA are located within the FEMA 100-Year Flood Zone. As shown on Figure 5.6-4, FEMA Flood Zone Boundary, the majority of Planning Areas 5 and 6, east of the Union Pacific Railroad (UPRR) are within the 100-Year Flood Zone. Additionally, the eastern edges of the Planning Areas 1 and 3, adjacent to Ted Kipf Road, and a portion of Planning Area 4 are all within the FEMA 100-Year Flood Zone.

Implementation of future GSP developments, public utilities and infrastructure improvements would affect the 100-Year Flood Zone and could also affect natural surface water systems The Conceptual Drainage Plan included in the GSP provides flood protection for future land uses within the entire project site and would releases the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with California drainage law (Figure 4-6). The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-direct the drainage around each of the Planning Areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm

north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for Planning Area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR 78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the southwest under the UPRR, via existing concrete culverts.

The modification of streams, washes, and drainages would alter surface runoff timing and drainage patterns and could increase peak flows and water flow velocities of downgradient streams. All these processes could lead to increased erosion, sediment transport, and sediment deposition impacts. The discharge of stormwater could also increase the flow rates of the receiving surface waters. These alterations of exiting drainage patterns could also result in flooding on or off site. These factors related to the alteration of existing drainage patterns could result in potentially significant impacts.

As discussed in Section 5.9.2, Regulatory Setting, all development within any special flood hazard area, which includes the FEMA 100-Year Flood Zone, shall be required to obtain a Floodplain Development permit, in accordance with Title 9, Division 16 of the County's Ordinance Code. Issuance of the permit will ensure that future development activities under the GSP will not increase the water surface elevation of the base flood more than on foot at any point; that all other required State and federal permits have been obtained; and, that construction standards for flood hazard reduction have been incorporated into the project(s).

Adherence to Title 9, Division 16 of the County's Ordinance Code, along with implementation of Mitigation Measures (MMs) HWQ-1, 2, and 4 would reduce impacts to below a level of significance.

Impact 5.9-4: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

A small water storage tank and basin are located approximately 4 miles northeast and upgradient of the GSPA, associated with mining activities. In the event of tank rupture or basin failure due to seiching, there is a remote possibility of some flooding within the defined drainages of the alluvial fan, although it appears, that any runoff would trend southerly of the Specific Plan Area, depending on localized drainage courses and man-made modifications to drainage paths.

The Specific Plan lies within two designated FEMA Flood Zones: A and X. Zone "A" is defined as "Without Base Flood Elevation" and Zone "X" is defined as "Areas of 0.2% annual chance floodplain; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood." These zones are defined on FEMA Panel Numbers 06025C1125C and 06025C1475C both effective 9/26/2008. The Project site is in an area where sheet and concentrated flow and erosion could occur. Appropriate project design by the civil engineer, construction, and maintenance can minimize the

sheet flooding potential (Earth Systems Pacific, 2019). The site is far inland, so the hazard from tsunamis is non-existent. Potential impacts from floods and seiches would be less than significant.

Impact 5.9-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The GSPA is located within the Amos Valley Groundwater Basin, as defined by the California Department of Water Resources. The Amos Valley Groundwater Basin does not fall within the basin classification that requires implementation of a sustainable groundwater management plan (also known as a groundwater sustainability plan, or GSP, under the Sustainable Groundwater Management Act definitions). However, in April 2017 the County amended a comprehensive Groundwater Management Ordinance to preserve, protect and manage groundwater resources. The Groundwater Ordinance, codified as Division 22 of Title 9 of the Imperial County Code, aims to avoid or minimize impacts on existing and proposed groundwater extraction activities and groundwater resources. The Groundwater Ordinance requires that existing extraction facilities be permitted and registered with the County. New extraction facilities must also obtain a permit from the County. As part of the proposed Specific Plan the applicant would seek a conditional use permit (CUP) for a new public water system well that would be able to pump up to 25 AF per year in compliance with the Groundwater Ordinance, and less than significant impacts are expected.

5.9.4. Mitigation Measures

The following Mitigation Measures would reduce impacts to below a level of significance.

MM HWQ-1: Prepare SWPPP and Implement BMPs Prior to Construction

For each implementation activity that is greater than one-acre in size, the project applicant or its contractor shall prepare a SWPPP specific to the project and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by the project applicant prior to commencement of work and shall be made conditions of the contract with the contractor selected to build and decommission the project. The SWPPP(s) shall incorporate control measures in the following categories:

- Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching)
- Flow diversion practices, if required (Mitigation Measure HWQ-2)

- Sediment control practices (temporary sediment basins, fiber rolls)
- Temporary and post-construction on- and off-site runoff controls
- Special considerations and BMPs for water crossings, wetlands, and drainages
- Monitoring protocols for discharge(s) and receiving waters, with emphasis place on the following water quality objectives: dissolved oxygen, floating material, oil and grease, pH, and turbidity
- Waste management, handling, and disposal control practices
- Corrective action and spill contingency measures
- Agency and responsible party contact information
- Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP

The SWPPP shall be prepared by a qualified SWPPP practitioner with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. BMPs for soil stabilization and erosion control practices and sediment control practices will also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.

Timing/Implementation:	*Prior to building permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM HWQ-2 Properly Dispose of Construction Dewatering in Accordance with the Construction General Permit (SWRCB Order No. 2009-0009-DWQ and Associated Amendments).

If required, all construction dewatering shall be discharged or utilized for dust control in accordance with the Construction General Permit. The Storm Water Pollution Prevention Plan shall provide Best Management Practices to be implemented if groundwater is encountered during construction.

Timing/Implementation:	*Prior to building and/or grading permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

MM HWQ-3 Incorporate Post-Construction Runoff BMPs into Project Drainage Plan.

A Drainage Plan/Drainage Report shall be prepared for each future development activity under the GSP. The project Drainage Plan shall adhere to guidelines in the County's Engineering Guidelines Manual, or whatever regulations are in place at the time of project implementation, to control and manage the on- and off-site discharge of stormwater to existing drainage systems and shall include a project description, project setting including discussions of existing and proposed conditions, any drainage issues related to the site, summary of the findings or conclusions, off-site hydrology, onsite hydrology, hydraulic calculations and a hydrology map.

The drainage study and specifications for improvements of all drainage easements, culverts, drainage structures, and drainage channels shall be provided to the DPW for approval. Required plans and specifications shall provide a drainage system capable of handling and disposing of all surface waters originating within the subdivision and all surface waters that may flow onto the subdivision from adjacent lands. Said drainage system shall include any easements and structures required by the DPW or the affected Utility Agency to properly handle the drainage on site and off site. The report should detail any vegetation and trash/debris removal, as well as address any standing water.

Infiltration basins will be integrated into the Drainage Plan to the maximum extent practical. The Drainage Plan shall provide both short- and long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.

Timing/Implementation:	*Prior to building and/or grading permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services* *Imperial County Department of Public Works*

MM HWQ-4 Comprehensive Drainage and Sedimentation Control Plan.

A Comprehensive Drainage and Sedimentation Plan (Plan) shall be prepared for all future development activities under the GSP, prior to the initiation of construction

prior to the issuance of a grading and/or building permit. Detailed hydrologic analysis shall be performed prior to final design. Results of these analyses will be submitted to the County for review. All proposed grading and impervious surfaces on site shall be reviewed and approved by the County with respect to its potential to cause or result in additional erosion and sedimentation, increased stormwater flows, or altered drainage patterns that could lead to unintentional ponding or flooding on site or downstream, and/or additional erosion and sedimentation. The Plan shall include, but not be limited to, the following measures:

- Construction of access corridors and temporary and permanent access roads shall not block existing drainage channels and shall not significantly alter the existing topography.
- The project proponent shall delineate the active drainage channels and avoid placement of proposed flood protection berms within active drainage channels. The drainage avoidance areas shall protect no less than 90 percent of the area of the active drainage channels from construction impacts.
- A hydraulic analyses shall be prepared for each future development activity that estimates the pre- and post- development peak discharges, water depths, and velocities for both smaller, more frequent events (2-, 5-, and 10-year events), as well as larger design storm events (100-year event) that would flow through each future project site, drainage avoidance area, and/or on either side of each proposed flood protection berm.
- The County shall be provided design details for the flood protection berms including subgrade preparation, construction methods, and armoring or scour protection.

Timing/Implementation:	*Prior to building and/or grading permit issuance for all construction.*
Enforcement/Monitoring:	*Imperial County Planning and Development Services*

Level of Significance After Mitigation

Impacts would be less than significant.

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5.10 Land Use and Planning

This section describes the affected environment and regulatory setting for land use and planning resources at the Glamis Specific Plan Area (GSPA) and vicinity. This section also examines the proposed Specific Plan's consistency with applicable plans and policies and describes potential land use and planning impacts that would result from construction and operation of the proposed Specific Plan.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan a public scoping meeting was conducted, and written comments were received from regulatory agencies. No comments related to land use and planning were received.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study (IS) located in Appendix A-2, that the following environmental issue area resulted in "No Impact" and was scoped out of requiring further review in this Draft Environmental Impact Report (EIR). Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding this issue.

- Would the proposed project physically divide an established community? Implementation of the Specific Plan would not physically divide an established community.

5.10.1 Environmental Setting

The GSPA is located on private land that is directly adjacent to the Imperial Sand Dunes Recreation Area (ISDRA) in an unincorporated area of Imperial County. It contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store. The project vicinity encompasses approximately 143 acres and is composed of seven (7) parcels of land identified as assessor parcel numbers (APN) 039-310-017; -022; -023; -026; -027; -029; and -030. The project vicinity is regionally accessible via State Route 78 (SR-78) (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road serves as a secondary form of access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The GSPA is also crossed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the project vicinity and Wash Road which parallels the UPRR south of SR-78.

Planning Area Land Uses

The GSPA can be characterized as an area of open desert with several adjoined one- and two-story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks

situated directly behind the store. Additionally, there is a separate seasonal off highway vehicle (OHV) repair business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower, approximately 180 feet in height, is located at the southeast portion of the GSPA. Due south is a single-family residence, large RV storage garage, and other related equipment storage buildings. Additionally, a prefabricated residential structure is located on the southeast corner of the GSPA. To the west, across SR-78 and opposite the Glamis Beach Store, there is an existing recreational vehicle (RV) storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Last, on the northeast side of the project vicinity, crossing the UPRR, there are two triangular parcels that are currently vacant.

The topography for the GSPA can be characterized as relatively flat. The only minor changes in topography are found along the northeast portion of the GSPA (northeast side of the UPRR), which can be attributed to existing elevated flood control earthen dikes and a slight, gradual southwest to northeast trending slope contour. Overall, elevation contours of the GSPA range from 325 feet above mean sea level (AMSL) at the southwest corner of the property to 344 feet AMSL at the northeast corner. Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the GSPA.

The GSPA and the ISDRA have been a popular OHV recreational destination since the 1960s. By the 2010s, Glamis and the ISDRA were experiencing exponential growth from RVers and OHV enthusiasts. As a result, events and activities such as “Camp RZR” started to occur within the GSPA that attracted as many as 20,000 visitors each year during Halloween weekend or the weekend before Halloween. With the advent of special events within the Glamis area discretionary temporary event permits and conditional use permits (CUPs) required by the County of Imperial were deemed necessary to allow for the continued provision of such events. Currently, special and temporary events are permitted under CUP #08-0025. Events such as “Camp RZR” are required to undergo review and approval of event operations and protocols with the County and key stakeholder agencies.

Surrounding Land Uses

The GSPA is surrounded by open desert land that is managed almost entirely by the Bureau of Land Management (BLM). Directly northwest of the project vicinity, is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use, however, camping is allowed. The GSPA is directly adjacent to the ISDRA to the southwest, south and southeast. The ISDRA is the largest mass of sand dunes in the State of California. North of the NADW is the Chocolate Mountain Aerial Gunnery Range (CMAGR) which

is a live-fire training range used for developing and training Marine Corps and Navy aviators. The area to the northeast of the project vicinity is BLM land but is not part of the ISDRA.

General Plan and Zoning Designation

The GSPA is designated on the adopted Land Use Element of the County of Imperial's General Plan as the GSPA (County of Imperial, 2015). As noted in the County's Land Use Element, approval of a specific plan by the Imperial County Board of Supervisors is required prior to any significant new use or development in this area, except agricultural use. The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. The general area of the Glamis Beach Store is currently zoned as C-2 (Medium Commercial), while the remainder of the GSPA is zoned as S-2 (Figure 3-5).

Land Use Designations

The GSPA is designated on the adopted Land Use Element of the County of Imperial's General Plan (County of Imperial, 2015). As noted in the Land Use Element, approval of a specific plan by the Imperial County Board of Supervisors, is required prior to any significant new use or development in this area, except agricultural use.

5.10.2 Regulatory Setting

State

California Government Code Section 65300 et seq. establishes the obligation of cities and counties to adopt and implement general plans. The general plan is a comprehensive, long-term, and general document that describes plans for the physical development of a city or county and of any land outside its boundaries that, in the city's or county's judgment, bears relation to its planning.

The general plan addresses a broad range of topics, including, at a minimum, land use, circulation, housing, conservation, open space, noise, and safety. In addressing these topics, the general plan identifies the goals, objectives, policies, principles, standards, and plan proposals that support the city's or county's vision for the area. The general plan is a long-range document that typically addresses the physical character of an area over a 20-year period or more.

The State Zoning Law (California Government Code Section 65800 et seq.) establishes that zoning ordinances, which are laws that define allowable land uses within a specific zone district, are required to be consistent with the general plan and any applicable specific plans.

Local

Imperial County General Plan

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

The General Plan includes ten elements: Land Use; Housing; Circulation and Scenic Highways; Noise; Seismic and Public Safety; Conservation and Open Space; Agricultural; Renewable Energy and Transmission; Water; Parks and Recreation. These elements satisfy the California Government Code requirements for general plan elements. Each element includes goals, objectives, and implementing policies and programs.

Relevant County of Imperial General Plan policies related to land use are provided below. Table 5.10-1 summarizes the proposed Specific Plan's consistency with the County's General Plan policies.

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

Imperial County Land Use Ordinance – Title 9

The County of Imperial Land Use Ordinance (Title 9) provides the physical land use planning criteria, development standards, and zoning regulations for development in the unincorporated areas of the County. Title 9 specifies permitted and conditional uses for the various zoning designations within unincorporated areas of the County. Development and performance standards included in Title 9 are adopted to protect the health, safety, and general well-being of the public through the orderly regulation of land uses within the County.

Imperial County Airport Land Use Compatibility Plan

The Imperial County Airport Land Use Compatibility Plan (ALUCP) provides the criteria and policies used by the Imperial County Airport Land Use Commission to assess compatibility between the principal airports in Imperial County and proposed land use development in the areas surrounding the airports. The ALUCP emphasizes review of local general and specific plans, zoning ordinances, and other land use documents covering broad geographic areas.

TABLE 5.10-1 CONSISTENCY WITH GENERAL PLAN LAND USE GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Land Use Element		
Section D.3. – Designated Specific Plan Areas – Glamis Specific Plan Area Policies: The Specific Plan shall focus on visitor-serving facilities and accommodations. Residential uses shall not be intended for permanent occupancy except as needed for on-site employees.	Yes	As detailed in Chapter II, Section B, the proposed Specific Plan provides visitor-serving facilities and accommodations to visitors to the Glamis Specific Plan Area (GSPA). Proposed residential uses and employee housing are intended solely as seasonal uses.
The Specific Plan shall include design guidelines for the physical arrangement of land uses and open space/recreation areas. Adequate open space shall be provided within the developed areas to complement the open space character of the area. Buildings should be sited to allow through views from Highway 78 to scenic vistas surrounding the site.	Yes	The proposed Specific Plan includes design guidelines for the physical arrangement of proposed land uses and open space/recreation areas. Adequate open space is provided within Planning Areas of the GSPA. These Planning Areas will be seasonally occupied and be left as open space the majority of the year.
The Specific Plan shall include a public facilities financing plan outlining capital improvements needed for the project, feasible financing mechanisms and timing for their construction. This includes sewer, water, and fire and police protection.	Yes	The proposed Specific Plan includes a public-facilities financing plan that addresses public facilities including sewer, water, and fire and police protection needed to serve the proposed uses and activities described in the proposed Specific plan.
The Specific Plan shall be accompanied by an Environmental Impact Report (EIR) which includes an analysis of project impacts to include the following: Air and water quality, biology, noise, traffic, visual/aesthetics, and such other issues as required by the County of Imperial and other agencies.	Yes	The proposed Specific Plan will have a corresponding Environmental Impact Report (EIR) that will analyze project impacts such as air and water quality, biology, noise, traffic, visual/aesthetics and such other issues as required by the County of Imperial and other agencies.

Source: Imperial County, 2015.

5.10.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

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

Impact 5.10-1: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Imperial County General Plan

The Specific Plan Area is contained within the County's designated GSPA. The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The proposed Glamis Specific Plan would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities. Thus, the proposed Specific Plan would be consistent with the County's General Plan Land Use Element and there would be no impact.

The proposed Specific Plan will require an amendment to Imperial County's General Plan Land Use Element to change the land use designation on the general area of the Glamis Beach Store from C-2 (Medium Commercial) and remainder of the GSPA which is zoned as S-2 to Commercial Recreation I, II, and III and a small portion to S-1 (Open Space/Recreation (Figure 4-1).

The proposed General Plan Amendment and rezone would place the proposed Specific Plan in conformance with county land use policies.

Imperial County Airport Land Use Compatibility Plan

The proposed Specific Plan is not located within the ALUCP for Imperial County Airports (County of Imperial, 1996) or within two miles of a public airport or public use airport. The nearest public use airport, Holtville Airport, is located 14 miles southwest the project vicinity.

5.10.4 Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

5.11 Noise

This section addresses potential noise impacts that may result from implementation of the Glamis Specific Plan. The following discussion addresses the existing conditions at the Glamis Specific Plan Area (GSPA), identifies applicable regulations, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential noise impacts was derived from the *Glamis Specific Plan Area Noise Study* prepared by LdN Consulting, (LdN Consulting, 2020). This report is provided as Appendix J of this EIR.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies and the public. The following issues related to noise were raised by the California Department of Fish and Wildlife (CDFW) are addressed in this section:

- An evaluation of impacts to adjacent open space lands from construction, long-term operations and maintenance.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study (IS) located in Appendix A-2, that the following environmental issue area resulted in "No Impact" and was scoped out of requiring further review in this DEIR. Please refer to Appendix A-2 of this DEIR for a copy of the Initial Study and additional information regarding this issue.

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? The proposed Project is not located within the vicinity of a private airstrip and the nearest privately-owned/public use airport, Salton Sea Airport, is located 13 miles northwest the Project Site.

5.11.1 Environmental Setting

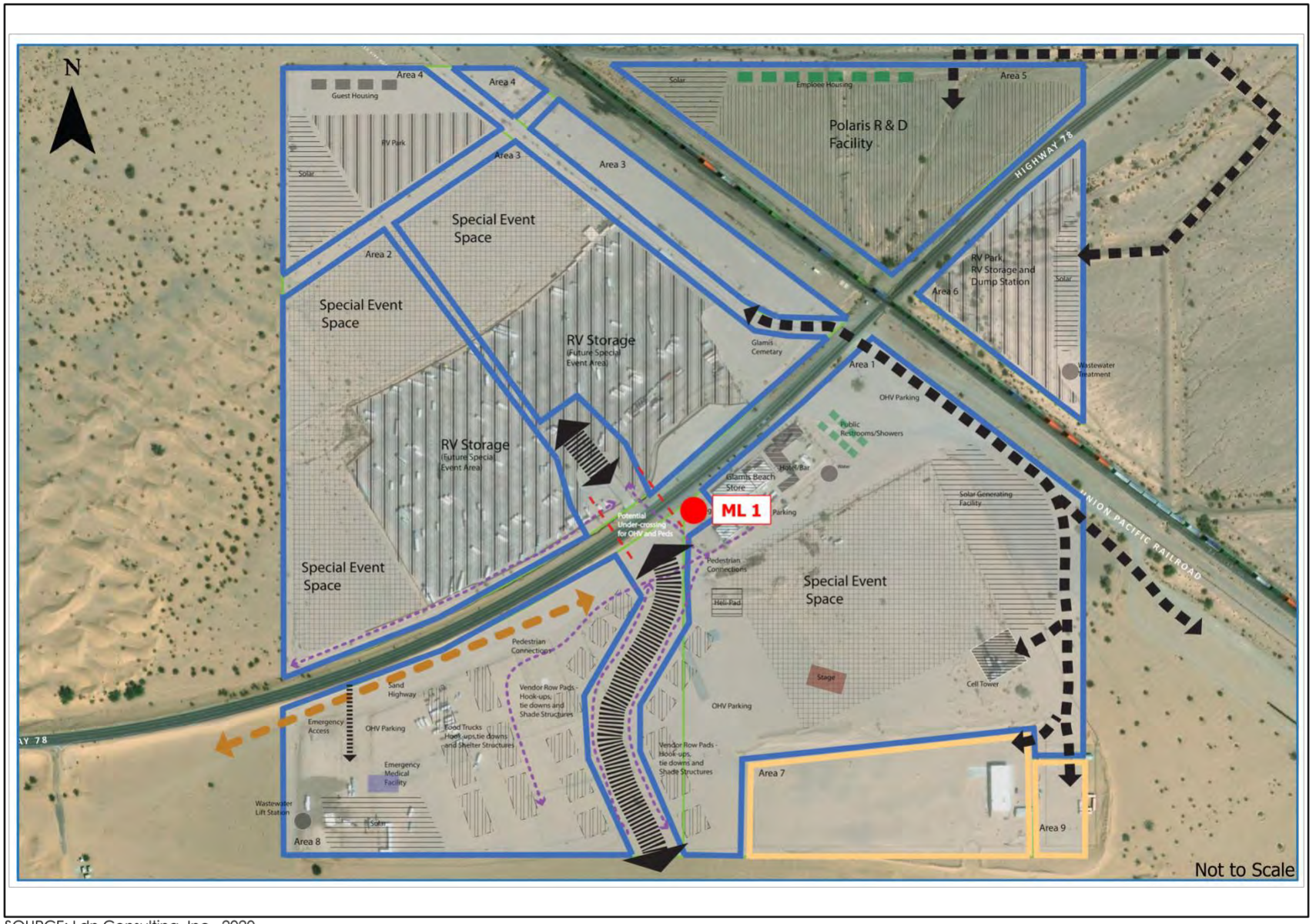
The GSPA is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the GSPA is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County. The GSPA contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by the Bureau of Land

Management (BLM). The Project site is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California. It contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store. The project vicinity encompasses approximately 143 acres and is composed of seven (7) parcels of land identified as assessor parcel numbers (APN) 039-310-017; -022; -023; -026; -027; -029; and -030. The project vicinity is regionally accessible via SR-78 (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road serves as a secondary form of access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The project vicinity is also crossed by the UPRR which runs north and south through the eastern half of the project vicinity and Wash Road which parallels the UPRR south of SR-78.

Directly northwest of the GSPA is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. Additionally, the Chocolate Mountain Aerial Gunnery Range (CMAGR) is located approximately 3 miles to the north of the GSPA. Within all of the various BLM lands surrounding the GSPA, the BLM has designated Recreation Management Zones (RMZs) which dictate the allowable recreation activities within those areas and provide for BLM's management objectives within those areas.

Ambient noise measurements were taken June 6, 2019 using a Larson-Davis Model LxT Type 1 precision sound level meter, programmed, in "slow" mode, to record noise levels in "A" weighted form. The sound level meter and microphone were mounted on a tripod, five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was calibrated before and after the monitoring using a Larson-Davis calibrator, Model CAL 200.

Due to site constraints and fencing, monitoring location 1 (ML1) was located along SR-78. The result of the noise level measurements are presented in Table 5.11-3. The noise measurement was monitored for a time period of 15 minutes. The existing noise levels in the GSPA consisted primarily of traffic from adjacent SR-78. The ambient Leq noise level measured in the GSPA during the morning hours was found to be roughly 48 dBA Leq. The statistical indicators Lmax, Lmin, L10, L50 and L90, are given for the monitoring location. As can be seen from the L90 data, 90% of the time the noise level is 43 dBA. The traffic volumes consisted of several dozen passenger vehicles and 4 larger trucks along SR 78 and no OHV activities were occurring due to the time of the year. The noise monitoring location is shown on Figure 5.11-1 (LdN Consulting, 2020).



SOURCE: Ldn Consulting, Inc., 2020.

Noise Monitoring Locations
Glamis Specific Plan
Figure 5.11-1

TABLE 5.11-1: MEASURED AMBIENT NOISE LEVELS

Measurement Identification	Location	Time	Noise Levels (dBA)					
			Leq	Leq	Leq	Leq	Leq	Leq
M1	Along SR-78	3:15–3:30 p.m.	48.2	41.9	72.7	48.5	44.4	42.5

Source: Ldn Consulting, 2020c.

A noise study and survey was conducted for the Final Environmental Impact Report (EIR) Heber Dunes Special Vehicle Recreation Area (SVRA) General Plan, December 2011 by AECOM. The survey was conducted between Friday, April 17 and Sunday, April 19, 2009, to document the existing noise environment at various locations in the vicinity. During the survey, average daytime hourly noise levels within the project area ranged from approximately 55 dBA to 63 dBA Leq, with maximum noise levels that ranged from 60 dBA to 88 dBA Lmax. Additional information is provided below (LdN Consulting, 2020). According to the Final EIR Heber Dunes SVRA, the primary noise sources at the noise measurement locations for the Heber Dunes SVRA were off highway vehicle (OHV) operations for measurement locations on the Project site and adjacent to the Heber Dunes SRVA boundary. At the time of the measurements, OHV use was moderate and it is estimated that peak use would be approximately double the activity at the time the measurements were conducted; thus, hourly noise levels during peak activity would likely be 3 dBA higher than the measured noise levels. Maximum noise levels, as they are associated with individual events, would not likely increase with the increased activity (LdN Consulting, 2020c).

Overview of Sound Measurement

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations. Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (i.e., industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from

heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed (approximately 30 years old or older) generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units and office buildings construction to California Energy Code standards is generally 30 dBA or more.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance average noise level). Typically, equivalent continuous sound level (Leq) is summed over a one-hour period. Lmax is the highest root mean squared (RMS) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period. The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 PM to 7 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL are also met.

5.11.2 Regulatory Setting

Federal

The Federal Noise Control Act (1972) addressed the issue of noise as a threat to human health and welfare. To implement the Federal Noise Control Act, the U.S. EPA (USEPA) undertook a number of studies related to community noise in the 1970s. The USEPA found that 24-hour averaged noise levels less than 70 dBA would avoid measurable hearing loss, levels of less than 55 dBA outdoors and 45 dBA indoors would prevent activity interference and annoyance (USEPA, 1972).

The U.S. Department of Housing and Urban Development (HUD) published a Noise Guidebook for use in implementing the Department's noise policy. In general, HUD's goal is exterior noise levels that are less than or equal to 55 dBA Ldn. The goal for interior noise levels is 45 dBA Ldn. HUD suggests that attenuation be employed to achieve this level, where feasible, with a special focus on sensitive areas of homes, such as bedrooms (HUD, 2009).

State

Title 24 of the California Code of Regulations (CCR) establishes standards governing interior noise levels that apply to all new single-family and multi-family residential units in California.

These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 as an upper limit on interior noise in all residential units.

In addition, the State of California General Plan Guidelines, provides guidance for noise compatibility. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Local

County of Imperial General Plan

The County of Imperial General Plan, specifically the Noise Element, outlines the goals and objectives for identifying and managing existing and future noise sources in County of Imperial. The General Plan also contains plans and policies to protect the public from noise intrusion. Table 5.11-2 identifies applicable General Plan policies, goals, and objectives applicable to the Project's consistency with the General Plan. While this Draft EIR analyzes the Project's consistency with the County of Imperial General Plan pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15125(d), the County of Imperial Planning Commission will determine the Project's consistency with the General Plan.

TABLE 5.11-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN NOISE GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Noise Element[(a)]		
Goal 1: Provide an acceptable noise environment for existing and future residents in Imperial County. ● **Objective 1.1:** Adopt noise standards which protect sensitive noise receptors from adverse impact. ● **Objective 1.3:** Control noise levels at the source where feasible. ● **Objective 1.5:** Identify sensitive receptors with noise environments which are less than acceptable, and evaluate measures to improve the noise environment.	Yes	The Glamis Specific Plan Area (GSPA) is surrounded by open desert land managed by the Bureau of Land Management (BLM). There are no residential uses (and therefore no sensitive noise receptors) within close proximity to the GSPA. All various BLM lands surrounding the GSPA are designated Recreation Management Zones (RMZs) which do not include any residential areas or other sensitive noise receptors in close proximity to the GSPA.

TABLE 5.11-2 CONSISTENCY WITH APPLICABLE GENERAL PLAN NOISE GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
• **Objective 1.6:** Collect data for existing noise sources in the County in order to improve the data base and enhance the ability to evaluate proposed projects and land uses.		
Goal 2: Review proposed projects for noise impacts and require design which will provide acceptable indoor and outdoor noise environments. • **Objective 2.1:** Adopt criteria delineating projects which should be analyzed for noise impact to sensitive receptors. • **Objective 2.3:** Work with project proponents to utilize site planning, architectural design, construction, and noise barriers to reduce noise impacts as projects are proposed.	Yes	During construction activities the proposed Specific Plan will comply with the County of Imperial's Noise Ordinance to minimize disturbance to surrounding areas. Furthermore, the proposed Specific Plan is consistent with varying policies established in the Noise Element in which goals, objectives and procedures will be taken into careful consideration to minimize adverse impacts to sensitive noise receptors. This includes consideration of design to provide adequate noise mitigation to provide acceptable indoor and outdoor noise standards.
Conservation and Open Space Element[(b)]		
Objective 2.6: Attempt to identify, reduce, and eliminate all forms of pollution; including air, noise, soil, and water.	Yes	An analysis of project noise levels is included in Appendix M, Glamis Specific Plan Noise Assessment (November 2020). No significant noise impacts were identified.

Source: Imperial County, n.d., 2016

The Property Line Noise Limits listed in Table 9 of the County's General Plan Noise Element and the County's Ordinance, Title 9, Division 7 (Noise Abatement and Control) Section 90702.00 Subsection A provides acceptable Sound level limits based on the property zoning. The applicable property line sound level limits are provided in Table 5.11-2 below and shall apply to noise generation from one property to an adjacent property. The standards imply the existence of a sensitive receptor on the adjacent, or receiving, property. In the absence of a sensitive receptor, an exception or variance to the standards may be appropriate. These standards do not apply to construction noise.

TABLE 5.11-3: PROPERTY LINE NOISE LEVEL LIMITS

Zone	Time	Applicable Limit One-hour Average Sound Level (Decibels)
Residential Zones	7 a.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
Multi-residential Zones	7 a.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50

TABLE 5.11-3: PROPERTY LINE NOISE LEVEL LIMITS

Zone	Time	Applicable Limit One-hour Average Sound Level (Decibels)
Commercial Zones	7 a.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	55
Light Industrial/Industrial Park Zones	Anytime	70
General Industrial Zones	Anytime	75

Notes:

When the noise-generating property and the receiving property have different uses, the more restrictive standard shall apply. When the ambient noise level is equal to or exceeds the Property Line noise standard, the increase of the existing or proposed noise shall not exceed 3 dB Leq.

The sound level limit between two zoning districts (different land uses) shall be measured at the property line between the properties.

Fixed-location public utility distribution or transmission facilities located on or adjacent to a property line shall be subject to the noise level limits of subsection A of this section, measured at or beyond six feet from the boundary of the easement upon which the equipment is located.

This section does not apply to noise generated by helicopters at heliports or helistops authorized by a conditional use permit.

This section does not apply to noise generated by standard agricultural field operating practices such as planting and harvesting of crops. The County of Imperial has a Right to Farm Ordinance (1031) which serves as recognition to agricultural practices to new development. Agricultural/industrial operations shall comply with the noise levels prescribed under the general industrial zones.

Source: LdN Consulting, 2020c.

These standards are enforced through the County's code enforcement program on the basis of complaints received from persons impacted by excessive noise. It must be acknowledged that a noise nuisance may occur even though an objective measurement with a sound level meter is not available. In such cases, the County may act to restrict disturbing, excessive, or offensive noise which causes discomfort or annoyance to reasonable persons of normal sensitivity residing in an area.

Based on the County of Imperial's Noise Element of the General Plan, construction noise from a single piece of equipment or a combination of equipment, shall not exceed 75 dB Leq, when averaged over an eight (8) hour period, and measured at the nearest sensitive receptor. This standard assumes a construction period, relative to an individual sensitive receptor of days or weeks. In cases of extended length construction times, the standard may be tightened so as not to exceed 75 dB Leq when averaged over a one (1) hour period.

Construction equipment operation shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. Saturday. No commercial construction operations are permitted on Sunday or holidays. In cases of a person constructing or modifying a residence for himself/herself, and if the work is not being performed as a business, construction equipment operations may be performed on Sundays and holidays between the hours of 9 a.m. and 5 p.m. Such non-commercial construction activities may be further restricted where disturbing, excessive, or offensive noise causes discomfort or annoyance to reasonable persons of normal sensitivity residing in an area.

The Noise/Land Use Compatibility Guidelines are not intended to allow the increase of ambient noise levels up to the maximum without consideration of feasible noise reduction measures. The

following guidelines are established by the County of Imperial for the evaluation of significant noise impact.

A. If the future noise level after the Project is completed will be within the "normally acceptable" noise levels shown in the Noise/Land Use Compatibility Guidelines, but will result in an increase of 5 dB CNEL or greater, the Project will have a potentially significant noise impact and mitigation measures must be considered.

If the future noise level after the Project is completed will be greater than the "normally acceptable" noise levels shown in the Noise/Land Use Compatibility Guidelines, a noise increase of 3 dB CNEL or greater shall be considered a potentially significant noise impact and mitigation measures must be considered.

Vibration Standards

Vibration is a unique form of noise as the energy is transmitted through buildings, structures and the ground whereas audible noise energy is transmitted through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

The County Noise Ordinance do not provide vibration standards. The Federal Transit Administration's (FTA) uses a threshold of 65 VdB for buildings where low ambient vibration is essential for interior operations. These buildings include hospitals and recording studios. A threshold of 72 VdB is used for residences and buildings where people normally sleep (i.e., residences and hotels). A threshold of 75 VdB is used for institutional land uses where activities occur primarily during the daytime (i.e., churches and schools). With respect to ground-borne vibration impacts on structures, the FTA states that ground-borne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings.

5.11.3 Analysis of Project Effects and Significance Determination

Methodology

A noise study and survey was conducted for the Final EIR Heber Dunes SVRA General Plan, December 2011 by AECOM. The survey was conducted between Friday, April 17 and Sunday, April 19, 2009, to document the existing noise environment at various locations in the vicinity. During the survey, average daytime hourly noise levels within the project area ranged from approximately 55 dBA to 63 dBA Leq, with maximum noise levels that ranged from 60 dBA to 88 dBA Lmax. Additional information is provided below (LdN Consulting, 2020). According to the Final EIR Heber Dunes SVRA, the primary noise sources at the noise measurement locations

for the Heber Dunes SVRA were OHV operations for measurement locations on the Project site and adjacent to the Heber Dunes SRVA boundary. At the time of the measurements, OHV use was moderate and it is estimated that peak use would be approximately double the activity at the time the measurements were conducted; thus, hourly noise levels during peak activity would likely be 3 dBA higher than the measured noise levels. Maximum noise levels, as they are associated with individual events, would not likely increase with the increased activity (LdN Consulting, 2020c).

Guidelines for Determination of Significance

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

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
2. Result in generation of excessive groundborne vibration or groundborne noise levels?

Analysis

Impact 5.11-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels?

Construction Noise

Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment includes haul trucks, water trucks, graders, dozers, loaders, and scrapers and can reach relatively high levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours.

The USPA has compiled data regarding the noise generating characteristics of specific types of construction equipment. Noise levels generated by heavy construction equipment can range from 60 dBA to in excess of 100 dBA when measured at 50 feet. However, these noise levels diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 75 dBA measured at 50 feet from the noise source to the receptor would be reduced to 69 dBA at 100 feet from the source to the receptor, and reduced to 63 dBA at 200 feet from the source.

Construction activities for Phase 1 through Phase 4 would occur within a timeframe of 20 to 50 years. The construction scenario includes construction of a conceptual scenario which includes multiple uses to include a water/wastewater infrastructure, potentially a hotel use, retail uses, additional employee residential uses, research and development uses, renewables such as photovoltaics or wind turbines to offset electrical usage and additional recreational vehicle

parking. The noise levels utilized in this analysis for the mass grading are based upon the anticipated list of equipment proved by the Project Applicant and is shown in Table 5.11.4 below. Most of the construction activities for Phases will consist of clearing and grubbing the site and the trenching of utilities. The equipment is anticipated to be spread out over the entire GSPA of each Phase with some equipment potentially operating at or near the property line while the rest of the equipment may be located over 500 feet from the same property line. This would result in an acoustical center for the grading operation of more than 200 feet from the nearest property line. It should be noted: no sensitive uses existing adjacent to or near the site. Construction activities from subsequent Phases may potentially elevate noise levels at the previous Phases if constructed with sensitive uses (i.e., employee housing).

TABLE 5.11-4 CONSTRUCTION GRADING NOISE LEVELS

Construction Equipment	Quantity	Duty Cycle (Hours/Day)	Source Level @ 50-Feet (dBA)	Cumulative Noise Level @ 50-Feet (dBA Leq-8h)
Rubber Tired Dozers	3	6.8	72	76.1
Excavators	2	6.8	73	75.3
Graders	2	6.8	74	73.3
Scrapers	1	6.8	74	76.3
Tractors/Loaders/Backhoes	2	6.8	73	77.1
			Cumulative Levels @ 50 Feet (dBA)	82.8
			Average Distance to Property Line	200
			Noise Reduction Due to Distance	-12.0
			Property Line Noise Level	70.8
			County of Imperial Threshold	75
			IMPACT?	**NO**

Source: Ldn Consulting, 2020c

As can be seen in Table 5.11-4, if all the equipment was operating in the same location, which is not physically possible, at an average distance of 200 feet from the nearest property line a noise level of less than 75 dBA over an 8-hour period at the property line is anticipated. Given this and the spatial separation of the equipment, the noise levels will comply with the County of Imperial's 75 dBA standard at all GSPA property lines of each Phase and no impacts are anticipated.

The project may also include the installation of off-site utility infrastructure which will generate temporary noise. Unlike construction associated with on-site development, utility construction is linear and usually extends roughly 300 feet along the alignment. Excavation and utility equipment would be limited due to alignment and work area constraints. Based on a construction area of approximately 50 feet by 300 feet, the average hourly off site construction noise levels would be approximately 75 dBA Leq at the edge of the right-a-way and 72 dBA Leq 8 hour or lower at 50

feet from the edge of construction. No sensitive uses are located along the utility alignment and no impacts are anticipated.

To further minimize noise from construction activities, the construction equipment should be equipped with properly operating and maintained muffler. Therefore, a less than significant noise impact would result from construction activities.

Operation

This section examines the potential stationary noise source levels associated with the development and operation of the proposed Specific Plan. Noise from a fixed or point source drops off at a rate of 6 dBA for each doubling of distance. Which means a noise level of 70 dBA at 5-feet would be 64 dBA at 10-feet and 58 dBA at 20-feet. A review of the proposed Specific Plan indicates that noise sources such as deliveries, parking lot activities and mechanical ventilation system (HVAC) are the primary sources of stationary noise from the project. This section provides a description and reference noise level measurement results.

Deliveries

The proposed Specific Plan includes commercial uses that would involve occasional truck deliveries. Typically, trucks used to make deliveries can generate a maximum noise level of 70-75 dBA at a distance of 50 feet depending on the size of the truck. The proposed Specific Plan is not anticipated to require a significant number of truck deliveries or the need for larger trucks. The deliveries for the proposed Specific Plan would consist of smaller deliveries in smaller trucks and/or step side vans and would be somewhat infrequent. The noise associated with one large truck delivery and smaller truck would not result in a significant number of truck trips to significantly increase noise within the GSPA. Therefore, truck deliveries would not be intrusive or result in substantially greater noise levels than currently exist and impacts would be less than significant.

Parking Lots

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale. However, the instantaneous sound levels generated by a car door slamming and engine starting up and acceleration may be an annoyance to adjacent sensitive receptors. The estimated noise levels associated with parking lot activities typically range from 60-65 dBA and are short term. It should be noted that parking lot noise are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower. Therefore, the proposed parking would not result in substantially greater noise levels than currently exist at the GSPA and impacts would be less than significant.

Mechanical Ventilation

Typically, mechanical equipment (HVAC) noise is 50-55 dBA at 50 feet from the source. HVAC units would be included on the roof of the proposed building and would be shielded by a mechanical screen and/or the roof parapet, which would further reduce the noise. The noise from the HVAC units would meet the County's Noise Standards at the nearest residents. It is important to note that the roof-top mounted mechanical ventilation (HVAC) all occurring at the same time. Additionally, mechanical ventilation system will cycle on and off throughout the day. No sensitive uses existing adjacent to the proposed Specific Plan and impacts from mechanical equipment would be less than significant.

Impact 5.11-2: Generation of excessive groundborne vibration or groundborne noise levels?

Construction activities such as blasting, pile driving, demolition, and excavation have the potential to generate ground vibrations. Vibration levels will attenuate to approximately 69 VdB at 200 feet from the source assuming a grader and excavator are the heaviest pieces of equipment used during grading or site clearing. As discussed, 100 VdB is the threshold where minor damage can occur in fragile buildings. Vibration levels are projected to be under this threshold; thus, structural damage is not expected to occur as a result of construction activities associated with the proposed Specific Plan. Vibration levels would be below the groundborne velocity threshold level of 72 VdB for residences and/or buildings where people sleep at the property line of the nearest sensitive receptor, 2 miles from the GPSA. Vibration would not be perceptible at the nearest receiver. Vibration-related impacts would be less than significant.

5.15.4 Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

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5.12 POPULATION AND HOUSING

This section describes the affected environment and regulatory setting for population and housing at within the Glamis Specific Plan Area (GSPA) and its vicinity. This section also examines the proposed Specific Plan's consistency with applicable plans and policies and describes population and housing impacts that would result from implementation of the proposed Specific Plan.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. No comments related to population and housing were received.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study (IS) located in Appendix A-2, that the following environmental issue area resulted in "No Impact" and was scoped out of requiring further review in this Draft Environmental Impact Report (EIR). Please refer to Appendix A-2 of this Draft EIR for a copy of the IS and additional information regarding this issue.

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? There are no year-round residents within the GSPA. The proposed Specific Plan would not result in the demolition of existing housing or result in the displacement of any residents.

5.12.1 Environmental Setting

The GSPA is located on private land that is directly adjacent to the Imperial Sand Dunes Recreational Area (ISDRA) in an unincorporated area of Imperial County. It contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store (Figure 3-3). The project vicinity encompasses approximately 143 acres and is composed of seven (7) parcels of land identified as assessor parcel numbers (APN) 039-310-017; -022; -023; -026; -027; -029; and -030. The GSPA is regionally accessible via State Route 78 (SR-78) (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road serves as a secondary form of access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The GSPA is also crossed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the GSPA and Wash Road which parallels the UPRR south of SR-78. There are no year-round residents within the GSPA.

5.12.2 Regulatory Setting

State

Senate Bill 375 and Assembly Bill 1233

Senate Bill 375 (SB 375), the Sustainable Communities and Climate Protection Act, was approved in 2008. SB 375 focuses on reducing greenhouse gas emissions, as discussed further in Section 4.6.2. As a part of this effort, this act requires that regional housing needs be addressed in conjunction with regional transportation in order to integrate housing, land use, and transportation planning together. SB 375 also requires the RHNA be completed every eight years and, if a jurisdiction does not meet this requirement, penalties may be incurred in accordance with SB 375 and Assembly Bill 1233.

Local

Imperial County General Plan

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

The General Plan includes ten elements: Land Use; Housing; Circulation and Scenic Highways; Noise; Seismic and Public Safety; Conservation and Open Space; Agricultural; Renewable Energy and Transmission; Water; Parks and Recreation. These elements satisfy the California Government Code requirements for general plan elements. Each element includes goals, objectives, and implementing policies and programs. The County is currently in the process of updating its Housing Element.

Relevant County of Imperial General Plan policies related to land use are provided below. Table 5.12-1 summarizes the project's consistency with the County's General Plan policies.

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

TABLE 5.12-1 CONSISTENCY WITH GENERAL PLAN LAND USE AND HOUSING GOALS AND OBJECTIVES

General Plan Policies	Consistency	Analysis
Land Use Element		
Goal 5: Encourage the compatible development of a variety of housing types and densities to accommodate regional population projections and special housing needs. ● **Objective 5.1:** Provide sufficient, suitable residential sites and housing supply to meet projected housing needs of all segments of the population. ● **Objective 5.2:** Promote affordable housing for residents of all income groups, including low and moderate income households.	Yes	The proposed Specific Plan will allow for limited residential development to accommodate those who require temporary housing in Glamis. Housing will be developed in the form of guest, employee housing, seasonal private residences and temporary use of recreational vehicles (RVs).
Housing Element		
Policy 6.1: Promote architectural design and orientation of residential developments in a way that promotes energy conservation.	Yes	The proposed Specific Plan does allow for some limited permanent residential land uses within the Glamis Specific Plan Area (GSPA), which consist mostly of employee housing. In addition, the proposed Specific Plan allows for the development of rooftop solar that could power residential development and could be used to meet future greenhouse gas (GHG) emission reduction regulations. Therefore, the proposed Specific Plan is consistent with and results in the implementation of, this policy of the General Plan. The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The 2019 California Energy Code was adopted by California Energy Commission (CEC) on May 9, 2018, and will apply to projects constructed after January 1, 2020. The 2019 California Energy Code is designed to move the State closer to its zero-net energy goals for new residential development.

Source: Imperial County, 2013 and 2015.

5.12.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

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

Analysis

Impact 5.12-1: 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 road or other infrastructure)?

The implementation of the proposed Specific Plan could result in a seasonal population growth (October through May) through the expansion of commercial and recreational activities within the GSPA. These activities would result in the development of new businesses and would require the construction of employee housing to be constructed. The proposed Specific Plan allows for some limited permanent residential land uses within the GSPA, which consist mostly of employee housing. The proposed zoning changes allow for the development of condominiums. Thus, the proposed Specific Plan could induce unplanned population growth through the development of new businesses, however, this population growth would be seasonal (October through May) and minimal. The impacts would be less than significant.

5.12.4 Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

5.13 Public Services

This section describes the existing public services in the vicinity of the Glamis Specific Plan Area (GSPA) and identifies the potential physical environmental impacts that would result from implementation of the proposed Specific Plan.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from regulatory agencies. No comments related to public services were received.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study (IS), located in Appendix A-2, that the following environmental issue areas resulted in no impact was scoped out of requiring further review in this Draft Environmental Impact Report (EIR). Please refer to Appendix A-2 of this Draft EIR for a copy of the IS and additional information regarding this issue.

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public services, specifically schools, parks and other public facilities? Implementation of the proposed Specific Plan would not include the provision of, or the need for, new schools, parks or other public facilities. The proposed Specific Plan would not result in new long-term housing. Any new housing would be for employees of the new businesses and would be seasonal only. There would not be a permanent increase in the population. Because the proposed Specific Plan would not result in a substantial increase in population, it does not require additional schools, parks, or other public facilities beyond that which already exists. No physical impacts related to the provision of schools, parks, or other facilities would occur.

5.13.1 Environmental Setting

The SPA) is located in the unincorporated community of Glamis, a remote area in the central portion of Imperial County. Glamis is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea.

Fire Protection Services

Fire protection services are provided to the GSPA by the Imperial County Fire Department (ICFD) through the Brawley Fire Department Station, located in the City of Brawley approximately 25 miles to the east. There are existing fire hydrant connections within the "Vendor Row" area. Additional connections would be installed, as necessary to meet the needs of the GSP. During Special Events, onsite fire protection would be provided with applicable fire protection services and apparatus.

Police Protection Services

The Imperial County Sheriff's Department provides law enforcement to the GSPA. Sheriff's officers that patrol the GSPA are based at the Brawley Police Department in the City of Brawley located approximately 27 miles east of the GSPA. During Special Events, on-site law enforcement will be provided with applicable services and apparatus.

5.13.2 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

State

Fire Protection

The California Fire and Building Codes address general and specialized fire safety requirements for buildings. Topics addressed in the codes include, but are not limited to, fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions to protect and assist first responders, and industrial processes.

Local

County of Imperial General Plan

The Imperial County General Plan provides goals, objectives, policies, and programs regarding the preservation and use of water. Table 5.13-1 provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed Project. While the Draft EIR analyzes the project's consistency with the General Plan pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 5.13-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies.	Consistency	Analysis
Seismic and Public Safety Element		
Goal 1: Include public health and safety considerations in land use planning. ● Objective 1.8: Reduce fire hazards by the design of new developments.	Yes	There are existing Fire hydrant connections within the "Vendor Row" area. Additional connections will be implemented to meet the needs of the further build-out of the Glamis Specific Plan Area (GSPA). During Special Events, onsite fire protection will be provided with applicable fire protection services and apparatus.

Source: Imperial County, n.d.

5.13.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

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

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for the following public services:
    - Fire Protection
    - Police Services

Analysis

Impact 5.13-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for the following public services:
1. Fire Protection
2. Police Services

Fire Protection

Fire protection services are provided to the GSPA by the ICFD through the Brawley Fire Department Station, located in the City of Brawley approximately 25 miles to the east. There are existing fire hydrant connections within the "Vendor Row" area. Additional connections would be installed, as necessary to meet the needs of the proposed Specific Plan. As discussed in Section

5.14, the Proposed Specific Plan is not anticipated to draw additional visitors to the GSPA beyond the numbers the site currently experiences.

During Special Events, the Special Events Management Plan (SEMP) shall address the following based upon the type of event, site layout and projected attendance:

- The specific number of fire department personnel will be established;
- There shall be adequate fire department staff onsite during all event operating hours; and
- An appropriate amount of fire apparatus will be provided.

During Special Events, onsite fire protection would be provided with applicable fire protection services and apparatus.Click here to enter text.

Police Services

The Imperial County Sheriff's Department provides law enforcement to the GSPA. Sheriff's officers that patrol the area are based at the Brawley Police Department in the City of Brawley located approximately 27 miles east of the GSPA. As discussed in Section 5.14, the Proposed Specific Plan is not anticipated to draw additional visitors to the Project site beyond the numbers the site currently experiences.

During Special Events, the SEMP shall address the following based upon the type of event, site layout and projected attendance:

- The specific number of officers will be established; and
- If required, adequate California Highway Patrol (CHP) personnel will be onsite during all event operating hours.

CHP may be directing traffic on State Route 78 (SR-78) and on/off the event parking lots. They will manage the highway traffic. During Special Events, on-site law enforcement will be provided with applicable services and apparatus.

The County of Imperial has a Development Impact Fee (DIF) which is authorized by County of Imperial Ordinance No. 4.32. This fee is applied to all development projects in incorporated and unincorporated County of Imperial land. Payment of the DIF is required of developers to fund public facilities such as fire protection facilities and sheriff facilities. As the GSPA is developed, DIF fees will be required to ensure that resources will be available for capital improvements to implement the County's capital and operational funding of future facilities. Potential impacts on fire and police services would be less than significant.

5.13.4 Mitigation Measures

None required.

Level of Significance After Mitigation

To be determined.

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5.14 Transportation/Traffic

This section addresses potential transportation and traffic impacts that may result from development of the proposed Specific Plan. The following discussion addresses the existing traffic in the Glamis Specific Plan Area (GSPA), identifies applicable regulations, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Proposed Specific Plan, as applicable.

Information used in preparing this section and in the evaluation of potential transportation/traffic was derived from the *Traffic Impact Study* prepared by Linscott Law and Greenspan (LLG) (LLG, 2022: Appendix M).

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from regulatory agencies. The following issues related to transportation and traffic were raised by the California Department of Transportation (Caltrans) and are addressed in this section:

- Implementation of the Glamis Specific Plan may impact Caltrans' Right-of-Way (ROW) in the future. Future projects should be based upon the Program EIR and have elements and/or mitigation measures for changes to Caltrans ROW. Caltrans welcome the opportunity to be a Responsible Agency under CEQA and to continue coordination of our efforts.
- Please provide a traffic impact study using the Caltrans-Vehicles Miles Traveled-Focused-Transportation Impact Study Guide -May 20, 2020.
- Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at Glamis Main Street on Figure 8 of the Draft Study & Environmental Analysis of the Glamis Specific Plan dated October 2020.

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- Page 4-2 - Section 4.2 - Proposed Project Section – Paragraph 2 - "This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands." Does Bureau of Land Management (BLM) support large variety of commercial uses adjoining Federal lands?
- Page 4-4 - Hospitality – "With an average annual attendance of 200,000 visitors to the Glamis area." According to the Visitation Data provided by LLG Engineers, the annual attendance for 2019 was over 600,000 for this area.

- Page 4-7 – Section 4.3 - Project Components – "In compliance with CEQA, only those components of the proposed Glamis Specific Plan that would have the potential to result in potential environmental effects are addressed in this EIR." Impacts to the transportation network need to be addressed as well.
- The entire stretch for vehicular access west of the proposed signalized intersection will be required to have a fence installed along SR-78.
- Clarify the type of gateway and the installation location. Non-essential highway appurtenances like a gateway will need to be 52 feet from the edge of travel way.
- Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at this intersection for review. Operations Policy Directive #13-02 can be provided upon request.
- "The Glamis Specific Plan proposes a transportation concept showing the portion of SR-78 traversing through the project vicinity being expanded from two thru lanes with an ultimate ROW width of 40 feet to a total of five (5) lanes with an ultimate ROW width of 72 feet. The segment of SR-78, west of the proposed intersection would have three easterly lanes - one thru lane, one left turn lane and one right turn lane - and two westerly lanes with one thru lane and an acceleration lane terminating approximately 1,000 feet from the intersection. The segment of SR-78 east of the intersection is of a similar configuration of the western segment with the number of lanes in each direction reversed and the acceleration lane terminating approximately 600 feet from the intersection." This concept proposes a significant level of expansion of the State Highway System, and close coordination with Caltrans will be required. Caltrans has made no determination on the proposed concepts.
- All proposed accesses along SR-78 for the proposed development Area 1-8 will need to be improved to meet Caltrans latest driveway standards with acceleration and deceleration lane based on the proposed development phasing.
- Page 4-11 Circulation Plan - "The project vicinity includes the Sand Highway that runs parallel to SR-78 along the northwestern edge of Planning Area 1." Is there a plan for separating the "Sand Highway" from SR-78 using physical barriers such as K-rail, fencing, or other means?
- Please specify location of signs and under whose authority signs will be posted.
- Page 4-26 - Table 4-2 "Anticipated Land Use Changes Through 2051/2071. Please include the growth rate used for the proposed traffic ADT in the report. Also, include this future growth volume in the future project traffic trips scenario in the Traffic Impact Analysis (TIA).
- Page 4-27 – Section 4.4 Project Phasing - "… the earliest construction beginning in late 2021. No uses would be opened prior to 2022 (opening year). The build-out year would be 2051/2071." What are the phases of the project to be constructed between 2021 and 2051?

Design

- The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments.
- In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances.
- The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections.
- Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17.
- If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation.
- New access points along the right of way may need to be evaluated based on access-controlled guidance.
- If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the HDM.
- US Bicycle Route System (USBRS) designates SR-78 as part of the "Southern Tier Route" in this area. Cyclists are present and use this road for regional and cross-country trips.
- As the Glamis Specific Plan develops and is implemented, consider how cyclists and off-highway vehicles may interact. Namely when off-highway vehicles take the shoulder of SR-78, where cyclists may be present.
- The document mentions "Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures." Please specify the locations of sidewalks and bike lanes, and other complete streets elements.

5.14.1 Environmental Setting

Access

The GSPA is regionally accessible via State Route 78 (SR-78) and serves as the primary transportation route for cars and trucks. Wash Road, a County-maintained dirt road, serves as access to BLM land and extends southeasterly from SR 78 for approximately 18.4 miles to County Highway S34 (Ogilby Road), a County maintained and paved two-lane highway. Circulation flow will be provided via the proposed "Glamis Mainstreet", which will interconnect by crossing SR-78. A secondary and emergency only access point to/from the GSPA to SR-78 will be provided on the west side of the GSPA, immediately south of SR-78.

Existing Street Network

The following is a description of the existing street network in the GSPA (Figure 5.14-1).

State Route 78 (SR 78) is a state highway that runs from Oceanside east to Blythe. Its western terminus is at Interstate 5 (I-5) in San Diego County and its eastern terminus is at I-10 in Riverside County. In Imperial County, SR 78 travels through the desert near the Salton Sea and passes through the City of Brawley before turning north and passing through an area of sand dunes on the way to its terminus in Blythe. Through the City of Brawley SR-78 is classified as a Major Arterial on the City of Brawley Circulation Element. Outside the City of Brawley it comes under the jurisdiction of the California Department of Transportation (Caltrans). Within the GSPA, SR-78 is constructed as a four-lane undivided roadway west of Best Avenue / Old Highway 111 and as a two-lane undivided roadway east of Best Avenue / Old Highway 111, through the GSPA. Bike lanes and bus stops are not provided, and the posted speed limit is 45 mph. Curbside parking is prohibited along both sides of the roadway (LLG, 2022; APPENDIX L).

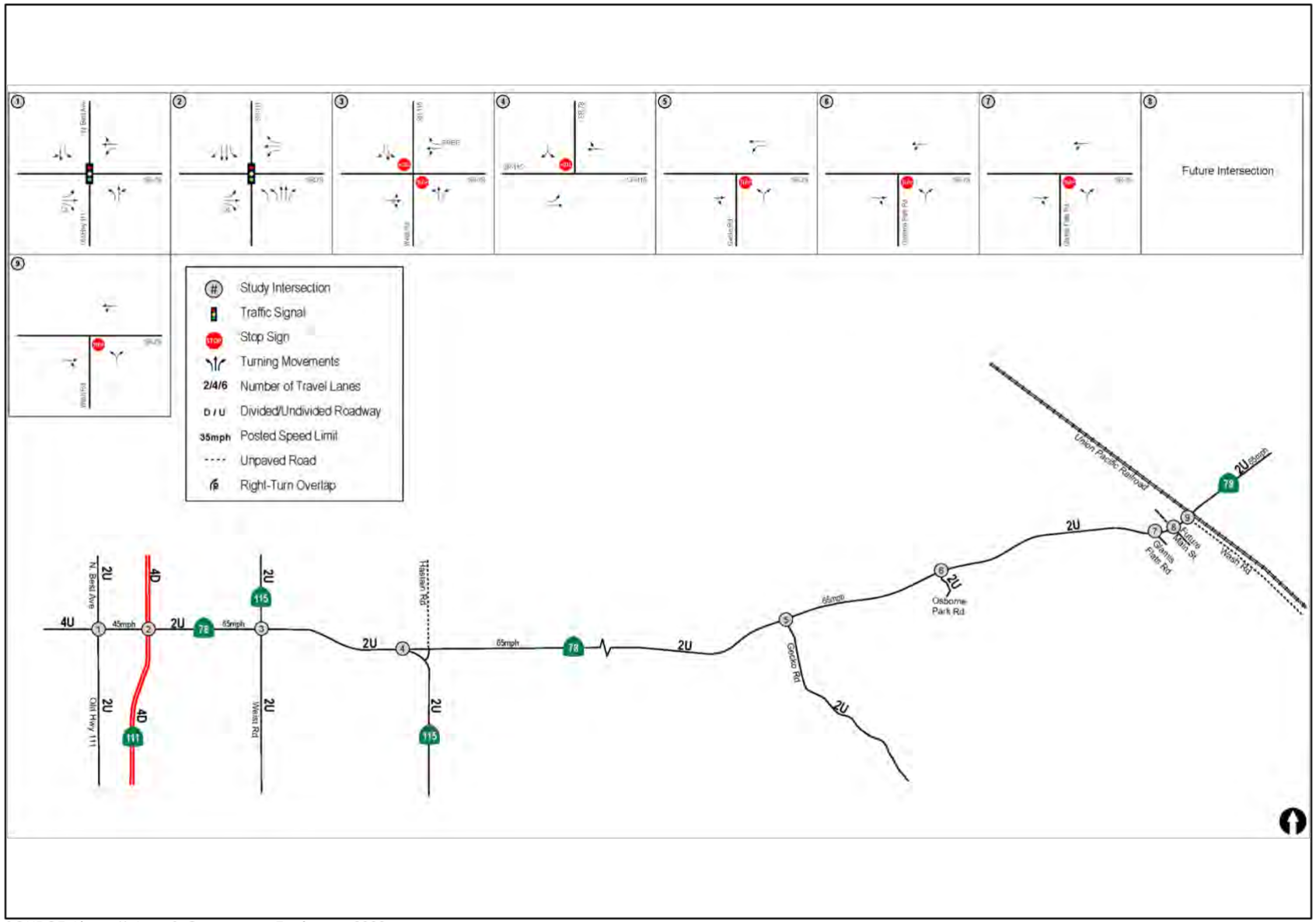
Existing Traffic Volumes

Existing Weekday and Weekend PM (5-7 PM) peak hour turning movement counts for the GSPA intersections were conducted in October / November 2019. The counts were conducted over the Halloween weekend (Thursday October 31– Sunday November 3), which is one of the busiest times of the year at the dunes. Traffic volumes are much lower during most of the year and therefore this analysis is conservative (LLG, 2022: Appendix L).

Daily traffic counts along Gecko Road, Osborne Park Road, Glamis Flats Road, and Wash Road were also conducted at the same time to assist in estimating trip distribution within the GSPA. These four (4) roadways provide direct access to the campgrounds for the majority of the visitors to the northern dunes.

Average daily traffic (ADT) counts along SR-78 were obtained from the Caltrans 2017 Traffic Volumes document, which provided the most recent data available at the time this report was prepared. Based on previous traffic studies conducted in the area and discussions with Caltrans, the peak 2017 volumes were adjusted upward by 2% per year for two years to estimate the 2019 baseline volumes (LLG, 2022: Appendix L).

Best Avenue / Old Highway 111. Through the City of Brawley Best Avenue / Old Highway 111 is classified as a Major Arterial on the City of Brawley Circulation Element. In the vicinity of the Project study area Best Avenue / Old Highway 111 is constructed as a four-lane divided roadway north of Main Street (SR-78), and as a two-lane undivided roadway south of Main Street (SR-78) and is under the jurisdiction of Caltrans. Bike lanes and bus stops are not provided and the posted speed limit ranges from 40-50 mph. Curbside parking is prohibited along both sides of the roadway (LLG, 2022: Appendix L).



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Existing Street Network
Glamis Specific Plan
Figure 5.14-1

SR 111. Through the City of Brawley is classified as an Expressway on the City of Brawley Circulation Element. In the vicinity of the Project Study Area it is a north/south four-lane divided roadway and is under the jurisdiction of Caltrans. Bike lanes or bus stops are not provided and the posted speed limit ranges from 55 to 60 mph. Curbside parking is prohibited along both sides of the roadway.

SR-115 is an east-west two-lane undivided state highway within the GSPA and per the County of Imperial Circulation Element is classified as a Major Collector and is under the jurisdiction of CALTRANs. The posted speed limit is 45 mph. Curbside parking is prohibited along the highway (LLG, 2022; Appendix L).

Transit

Airports

The Holtville Airport, located approximately 16 miles southwest the GSPA, is the nearest public airport.

Transit Service

Imperial Valley Transit (IVT) is a fixed route public bus service. IVT was created in 1989 and began operations as a five-route system with 3 buses running Monday through Friday. The passenger ridership averaged approximately 3,000 passengers a month. Today, the service has 12 routes and over 20 buses in operation. The passenger ridership averages approximately 55,000 passengers a month. The transit service is operated as a turnkey operation by First Transit, Inc. The service is administrated and funded by the Imperial County Transportation Commission (ICTC). ICTC members represent each City, the County and the Imperial Irrigation District (IID). Funding is provided annually through the ICTC adopted Overall Work Program Budget and Finance Plan. The source of the funding includes but is not limited to the Federal Transportation Administration (FTA) 5307, 5311 and 5317 funds, State Transportation Development Act (TDA) including Local Transportation (LTF) and State Transit Assistance (STA), and local fare revenue (Imperial Valley Transit, 2021). Routes are categorized as:

- Fixed routes which operate over a set pattern of travel and with a published schedule;
- Deviated fixed routes which accommodate people with disabilities and limited mobility; and
- Remote zone routes, which operate once a week.

No transit service is provided in the immediate vicinity of the GSPA. The nearest bus stop is located in Brawley approximately 15 mile west and the nearest rail station is the Yuma, Arizona Station approximately 50 miles southeast of the GSPA.

Bicycle and Pedestrian Facilities

The U.S. Bicycle Route System (USBRS) designates SR-78 as part of the "Southern Tier Route" in this area. Cyclists are present and use this road for regional and cross-country trips (USBRS, 2021).

5.14.2 Regulatory Setting

State

California Department of Transportation (Caltrans)

The California Department of Transportation (Caltrans) has jurisdiction over state highways and establishes maximum load limits for trucks and safety requirements for oversized vehicles that operate on highways. Transportation and traffic impacts are regulated by Caltrans codes pertaining to licensing, size, weight, and load of vehicles operated on highways (California Vehicle Code [CVC], Division 15, Chapters 1 through 5) as well as the Street and Highway Code (Code §§660-711, 670-695) which requires permits from Caltrans for any roadway encroachment during truck transportation and delivery. The Street and Highway Code includes regulations for the care and protection of state and county highways and provisions for the issuance of written permits and requires permits for any load that exceeds Caltrans weight, length, or width standards for public roadways.

Senate Bill 743

Senate Bill 743/State California Environmental Quality Act (CEQA) Guidelines Senate Bill (SB) 743, signed in 2013, required a change in the way that transportation impacts are analyzed under CEQA. Historically, environmental review of transportation impacts has focused on the delay vehicles experience at intersections and roadway segments, as expressed in Levels of Service (LOS). The legislation, however, sets forth that upon certification of new guidelines by the Secretary of the Natural Resources Agency, automobile delay, as described solely by LOS or other similar measures of traffic congestion shall not be considered a significant impact on the environment. Local jurisdictions may continue to consider LOS with regard to local general plan policies, zoning codes, conditions of approval, thresholds, and other planning requirements. New criteria for measuring traffic impacts under CEQA are to focus on the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses.

State CEQA Guidelines Section 15064.3 was adopted in December 2018 to implement SB 743. In addition to establishing Vehicle Miles Traveled (VMT) as the most appropriate measure of transportation impacts, and shifting away from LOS, primary elements of this section:

- Reiterate that a project's adverse effect on automobile delay shall not constitute a significant environmental impact;

- Create a rebuttable presumption of no significant transportation impacts for (a) land use projects within 0.5-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allow a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Give lead agencies discretion to select a methodology to evaluate a project's VMT but requires disclosure of that methodology in the CEQA documentation. Lead agencies are required to comply the with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the State Office of Planning and Research (OPR) has also published a *Technical Advisory on Evaluating Transportation Impacts in CEQ*A (December 2018), which provides guidance in the calculation and application of VMT analyses within CEQA documents.

Local

VMT Analysis

The County of Imperial has not yet formally developed draft guidelines or adopted significance criteria and technical methodologies for VMT analysis. Therefore, guidance provided in the Governor's OPR SB 743 *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, and Institute of Transportation Engineers (ITE's) *Guidelines for Transportation Impact Studies in the San Diego Region*, May, 2019 was utilized by Linscott Law and Greenspan (LLG) in the preparation of the *Traffic Impact Study* (LLG, 2022: Appendix M). These guidance documents are consistent with Caltrans' *Vehicle Miles Traveled-Focused Transportation Impact Study Guide,* May 20, 2020 (Caltrans, 2020, page 5).

General Plan Consistency

The Imperial County General Plan Circulation and Scenic Highways Element is intended to provide a plan to accommodate a pattern of concentrated and coordinated growth, providing both, regional and local linkage systems between unique communities, and its neighboring metropolitan regions while protecting and enhancing scenic resources within both rural and urban scenic highway corridors. The Imperial County General Plan Circulation and Scenic Highways Element policies related to the proposed Specific Plan are outlined below. Table 5.14-1 summarizes the proposed Specific Plan's consistency with the applicable General Plan policies.

While this Draft Environmental Impact Report (EIR) analyzes the proposed Specific Plan's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Planning Commissioners and Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 5.14-1. CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS AND OBJECTIVES

General Plan Policies and Objectives	Consistency	Analysis
Circulation and Scenic Highways Element (CSHE)		
CSHE Goal 1: The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment. **Objective 1.2** Require a traffic analysis for any new development which may have a significant impact on County roads. A traffic analysis may not be necessary in every situation, such as when the size or location of the project will not have a significant impact upon and generate only a small amount of traffic. Also, certain types of projects, due to the trip generation characteristics, may add virtually no traffic during peak periods. These types of projects may be exempt from the traffic analysis requirements. Whether a particular project qualifies for any exemption will be determined by the Department of Public Works Road Commissioner. **Objective 1.12** Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on existing roadways and intersection to a level of service (LOS) worse than "C" without providing appropriate mitigations to existing infrastructure. This can include fair share contributions on the part of developers to mitigate traffic impacts caused by such proposed developments.	Yes	The proposed Specific Plan contains a Conceptual Circulation Plan that describes how motor vehicles, off highway vehicle's (OHVs) and pedestrians would access the Glamis Specific Plan Area (GSPA). The proposed Specific Plan demonstrates how development of the GSPA would not interfere vehicular transportation along State Route 78 (SR-78) and other area roadways, and would accommodate the County's goal of providing a safe and efficient transportation system with minimal disruption to the environment for incoming visitors to the GSPA. In addition, a traffic study was prepared for the project. The project would not increase traffic on existing roadways and intersections to a LOS worse than C.
Multiple Modes of Transportation Goal 2: Consider all modes of transportation including motor vehicle, rail, transit, air transportation and non-motorized transportation.	Yes	The proposed Specific Plan considers all modes of transportation including motor vehicle, rail, transit, air transportation and non-motorized transportation regarding access to the GSPA. Due to the GSPA being a remote recreational enclave, the only feasible forms of transportation to/from the GSPA and surrounding BLM lands is via car/truck, OHV, and pedestrian access. The GSPA is not located within an urban area where public transit is proximately available.

TABLE 5.14-1. CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS AND OBJECTIVES

General Plan Policies and Objectives	Consistency	Analysis
Regional Transportation System Goal 5: Participate in and assist with coordinating regional efforts which integrate the County Transportation System with the Regional Transportation System.	Yes	During the development of the GSPA, stakeholder meetings were held with Caltrans District 11, and the Imperial County Transportation Commission (ICTC) to obtain their input into the development of the proposed Specific Plan, and to accommodate the County's goal of participating and coordinating with regional efforts to integrate the County Transportation System with the Regional Transportation System. Therefore, the proposed Specific Plan is consistent with this goal.

Source: County of Imperial Circulation and Scenic Highway Element, 2008.

5.14.3 Analysis of Project Effects and Significance Determination

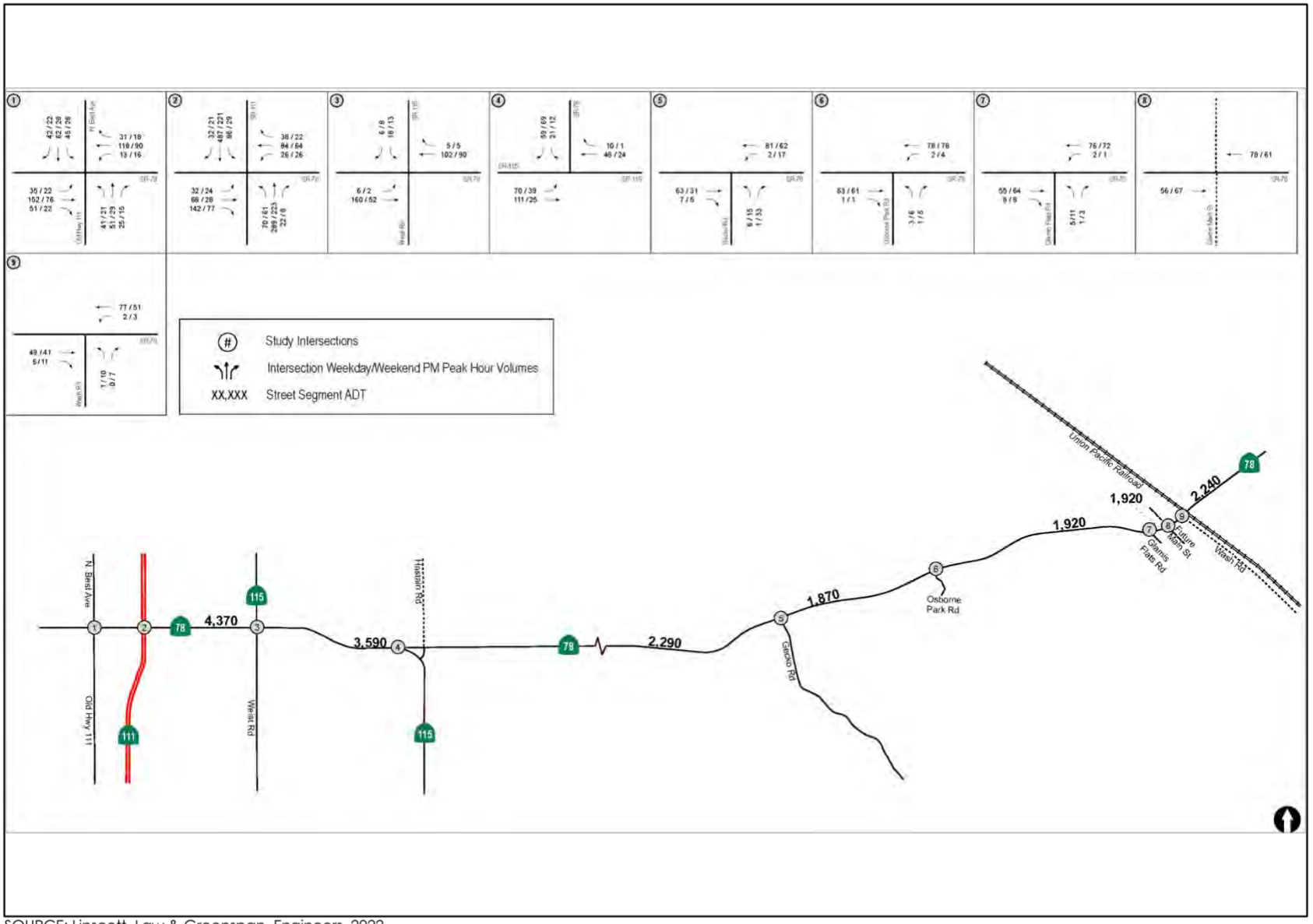
This section presents the significance criteria used for considering project impacts related to transportation and traffic, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

Project Study Area

The following intersections and segments were analyzed in this study and were chosen since they will carry the majority of Project traffic.

Intersections:

1. SR-78 / Old Highway 111/ Best Avenue
2. SR-78 / SR-111
3. SR- 78 / SR-115 (west)
4. SR-78 / SR-115 (east)
5. SR-78 / Gecko Road
6. SR-78 / Osborne Park Road
7. SR-78 / Glamis Flats Road
8. SR-78 / Glamis Mainstreet (future access)
9. SR-78 / Wash Road



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Existing Traffic Volumes
Glamis Specific Plan
Figure 5.14-2

Segments:

SR-78:

- Old Highway 111/ Best Avenue to SR-115 (west)
- SR-115 (west) to SR-115 (east)
- SR-115 (east) to Gecko Road
- Gecko Road to Osborne Park Road
- Osborne Park Road to Glamis Flats Road
- Glamis Flats Road to Glamis Mainstreet (future access)
- Glamis Mainstreet (future access) to Wash Road
- East of Wash Road

Methodology

The analysis prepared in this section is based on a *Traffic Impact Study* prepared by LLG (LLG, 2022: Appendix L).

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

Table 5.14-2 summarizes the description for each LOS. Table 5.14-3 depicts the criteria, which are based on the average control delay for any particular minor movement (signalized and unsignalized intersections).

TABLE 5.14-2 STATE HIGHWAY SEGMENT LEVEL OF SERVICE DEFINITIONS

LOS	Volume to Capacity (V/C)	Congestion/ Delay	Traffic Description
"A"	< 0.41	None	Free flow.
"B"	0.42-0.62	None	Free to stable flow, light to moderate volumes.
"C"	0.63-0.80	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
"D"	0.81-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.

TABLE 5.14-2 STATE HIGHWAY SEGMENT LEVEL OF SERVICE DEFINITIONS

LOS	Volume to Capacity (V/C)	Congestion/ Delay	Traffic Description
"E"	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
"F"	< 1.00	Considerable	Forced or breakdown flow. Delay measured in average travel speed (MPH). Signalized segments experience delays >60.0 seconds/vehicle.

Source: Linscott, Law & Greenspan, 2022.

TABLE 5.14-3 LEVEL OF SERVICE CRITERIA - UNSIGNALIZED INTERSECTIONS

LOS	Average Control Delay (Signalized) (sec/veh)	Average Control Delay (Unsignalized) (sec/veh)
A	≤10.0	≤10
B	10.0 to 20.0	10.1 to 15.0
C	20.1 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	≥80.1	≥50.0

Source: Linscott, Law & Greenspan, 2022.

The County of Imperial does not have published LOS standards. However, the County General Plan does state that the LOS goal for intersections and roadway segments is to operate at LOS C or better. Therefore, if an intersection or segment degrades from LOS C or better to LOS D or worse with the addition of project traffic, the effect is considered substantial. If the location operates at LOS D or worse with and without project traffic, the effect is considered substantial if the project causes the intersection delta to increase by more than two (2) seconds, or the Volume to Capacity (V/C) ratio to increase by more than 0.02. These thresholds are summarized below in Table 5.14-4 and are consistent with those used in the City of El Centro and the County of Imperial in numerous traffic studies (LLG, 2022: Appendix L).

TABLE 5.14-4 TRAFFIC EFFECT THRESHOLDS

LOS with Project [a]	Allowable Increase Due to Project Effect [b]					
	Freeways		Roadway Segments		Intersections	Ramp Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
D, E & F (*or ramp meter delays above 15 minutes*)	0.01	1	0.02	1	2	2c

Notes:

a. All level of service measurements are based upon Highway Capacity Manual (HCM) procedures for peak-hour conditions. However, V/C ratios for Roadway Segments may be estimated on an ADT/24-hour traffic volume. The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped or not densely developed locations per jurisdiction definitions). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

If a proposed project's traffic causes the values shown in the table to be exceeded, the effects are deemed to be substantial. These changes may be measured from appropriate computer programs or expanded manual spreadsheets. The project applicant shall then identify feasible improvements that will maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see note a above), or if the project adds a significant amount of peak hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for improving substantial effect changes.

b. The allowable increase in delay at a ramp meter with more than 15 minutes of delay and freeway LOS E is 2 minutes and at LOS F is 1 minute.

General Notes:

V/C = Volume to Capacity Ratio

Speed = Arterial speed measured in miles per hour

Delay = Average stopped delay per vehicle measured in seconds for intersections, or minutes for ramp meters.

LOS = Level of Service

Source: Linscott, Law & Greenspan, 2022: Appendix L.

Heavy Vehicle Rate

SR-78 is a goods movement route connecting California with Arizona and Nevada. As such, a greater than average percentage of the vehicles traveling on SR-78 are multi-axle and considered to be "heavy vehicles". A 30.8% heavy-vehicle rate was recorded on SR-78 per the *2018 Truck Traffic: Annual Average Daily Truck Traffic* published on the Caltrans Traffic Census Program website. This rate was used in the Synchro traffic analysis for the proposed Specific Plan instead of the default two percent.

Signalized Intersections

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

Unsignalized Intersections

For unsignalized intersections, LOS is determined by the computed or measured control delay and is defined for each minor movement. LOS is not defined for the intersection as a whole.

Street Segments

Street segments were analyzed based upon the comparison of ADT to the County of Imperial Roadway Classifications, LOS and ADT table (see Table 5.14-5 below). Table 5.14-5 provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics. The segment capacities were originally developed based on observations of weekday traffic volumes, and therefore, only an analysis of weekday conditions was conducted. Segment analysis is a comparison of ADT volumes and an approximate daily capacity on the subject roadway.

TABLE 5.14-5 IMPERIAL COUNTY STANDARD STREET CLASSIFICATION AVERAGE DAILY VEHICLE TRIPS

Road		Level of Service and ADT*				
Class	X-Section (feet)	A	B	C	D	E
Expressway	128/210	30,000	42,000	60,000	70,000	80,000
Prime Arterial	106/136	22,200	37,000	44,600	50,000	57,000
Minor Arterial	82/102	14,800	24,700	29,600	33,400	37,000
Major Collector (Collector)	64/84	13,700	22,800	27,400	30,800	34,200
Minor Collector (Local Collector)	40/70	1,900	4,100	7,100	10,900	16,200
Residential Street	40/60	*	*	< 1,500	*	*
Residential Cul-de-Sac / Loop Street	40/60	**	*	< 1,500	*	*
Industrial Collector	76/96	5,000	10,000	14,000	17,000	20,000
Industrial Local Street	44/64	2,500	5,000	7,000	8,500	10,000

* LOS are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. LOS normally apply to roads carrying through traffic between major trip generators and attractors.

Linscott, Law & Greenspan, 2022

Peak Hour Intersection Levels of Service

Table 5.14-6 summarizes the existing intersection operations. As seen in Table 5.14-6, all GSPA intersections are calculated to currently operate at LOS C or better, with most locations operating at LOS A.

TABLE 5.14-6 EXISTING INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Delay [a]	LOS [b]
1. SR 78 / Old Highway 111 / Best Avenue	Signal	Wkday	15.5	B
		Wkend	15.3	B
2. SR 78 / SR 111	Signal	Wkday	24.8	C
		Wkend	21.2	C
3. SR 78 / SR 115 (west)	MSSC[c]	Wkday	11.8	B

TABLE 5.14-6 EXISTING INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Delay [a]	LOS [b]
		Wkend	10.0	A
4. SR 78 / SR 115 (east)	MSSC	Wkday	10.6	B
		Wkend	9.3	A
5. SR 78 / Gecko Road	MSSC	Wkday	10.0	A
		Wkend	9.4	A
6. SR 78 / Osborne Flats Road	MSSC	Wkday	9.8	A
		Wkend	9.4	A
7. SR 78 / Glamis Flats Road	MSSC	Wkday	9.8	A
		Wkend	9.7	A
8. SR 78 / Glamis Mainstreet (future access)	-[d]	Wkday	-	-
		Wkend	-	-
9. SR 78 / Wash Road	Yield	Wkday	9.9	A
		Wkend	9.4	A

Notes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. MSSC = Minor Street Stop-Controlled intersection. Worst-case delay reported.
d. Intersection does not exist under existing conditions.
General Notes:
Wkday= Weekday PM Peak Hour (5:00-7:00 PM)
Wkend= Weekend PM Peak Hour (5:00-7:00 PM
Linscott, Law & Greenspan 2022

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

Daily Street Segment Levels of Service

Table 5.14-7 summarizes the existing segment operations. As seen in Table 5.14-7, all GSPA segments currently operate at LOS C or better.

TABLE 5.14-7 EXISTING STREET SEGMENT OPERATIONS

Street Segment	LOS E [a] Capacity	ADT [b]	LOS [c]	V/C [d]
SR 78				
Old Highway 111 / Best Avenue to SR 115 (west)	16,200	4,370	C	0.270
SR 115 (west) to SR 115 (east)	16,200	3,590	B	0.222
SR 115 (east) to Gecko Road	16,200	2,290	B	0.141
Gecko Road to Osborne Park Road	16,200	1,870	A	0.115
Osborne Park Road to Glamis Flats Road	16,200	1,920	B	0.119
Glamis Flats Road to Glamis Mainstreet (future access)	16,200	1,920	B	0.119
Glamis Mainstreet (future access) to Wash Road	16,200	1,920	B	0.119
East of Wash Road	16,200	2,240	B	0.138

Notes: a. The capacity of the roadway at Level of Service E; b. Average Daily Traffic; c. Level of Service; d. The Volume to Capacity ratio.
Source: Linscott, Law & Greenspan, 2022

5.14.4 Trip Generation/Distribution/Assignment

Project Generated Traffic

Construction Phase

Short-term construction traffic would be generated with construction of the proposed Project. This would include traffic from construction workers and truck traffic for material removal (i.e. grading export and demolition debris) and material delivery (i.e. building materials, water, etc.), anticipated to be spread throughout the day. The contribution of construction trips to the surrounding street segments and intersections was not modeled because anticipated trip volumes would be temporary and would not generate more than 50 peak hour trips, which is the threshold for modeling.

Traffic generated by construction activities would be temporary and would not result in direct impacts on key street segments and intersections in the study area. Traffic impacts related to construction activities would be less than significant and no mitigation would be required.

Operational Phase

The primary objective of the proposed Specific Plan is to formalize the site and provide services and amenities. The proposed Specific Plan's proposed land uses are intended to serve the existing patrons of the dunes and will not operate year-round due to the long distance from population bases and the extreme heat.

However, as shown on Table 5.14-8, to provide comprehensive assessment of the proposed Specific Plan's effects to the surrounding system, the following specific components of the proposed Specific Plan were analyzed, which are anticipated to be developed within the first ten years:

- Restaurant Expansion: 4,000 square feet (SF)
- Retail Expansion: 2,000 SF
- Service Center: Four (4) Service Bays
- Research & Development Facility: 5,000 SF
- Hotel / Motel: 20 Rooms
- Multi-Family Residential / Staff Housing: 14 Units
- RV Park: 30 Sites
- Vendor Row Expansion

Trip generation rates for the proposed Specific Plan were based on ITE's Trip Generation Manual (10th Edition). Table 5.14-8 tabulates the total proposed Specific Plan traffic generation. The proposed Specific Plan is calculated to generate a total of approximately 1,245 ADT with 90 trips (49 inbound / 41 outbound) during the Weekday PM peak hour and 106 trips (56 inbound / 50 outbound) during the Weekend PM peak hour. No trip generation credits were taken to account for

existing visitors to the dunes. The analysis assumes that 100% of the trips to the GSPA will be new trips, not trips by existing patrons of the dunes.

Trip Distribution/Assignment

The trip distribution percentages were estimated based on the existing traffic flow patterns observed at Gecko Road, Osborne Park Road, Glamis Flats Road, and Wash Road, and the proposed Specific Plan's proximity to regional highways / freeways in the vicinity.

Figure 5.14-3 depicts the trip distribution. Figure 5.14-4 depicts the assignment of project traffic and Figure 5.14-5 depicts the Existing + Project traffic volumes.

TABLE 5.14-8 PROJECT TRIP GENERATION

Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour				PM Peak Hour			
		Rate a	Volume	Rate	In: Out Split	Volume In	Volume Out	Rate	In: Out Split	Volume In	Volume Out
Restaurant Expansion	4,000 SF	112.18/ 1,000 SF	449	9.94	55:45	22	18	9.77	62:38	24	15
Retail Expansion	2,000 SF	37.75/ 1,000 SF	76	0.94	50:50	1	1	3.81	48:52	4	4
Service Center [b]	4 Bays	12.48/ Bay	50	1.52	68:32	4	2	2.17	32:68	3	6
R&D Facility [c]	4,000 SF	16.19/ 1,000 SF	81	1.92	83:17	8	2	2.45	32:68	4	8
Hotel / Motel	20 Rooms	8.36/ Room	167	0.47	59:41	6	3	0.60	51:49	6	6
Multi-Family Residential / Staff Housing	14 DU	7.32/ DU	102	0.46	23:77	1	5	0.56	63:37	5	3
RV Park [d]	30 Sites	4.00/Site	120	0.21	36:64	2	4	0.27	65:35	5	3
Vendors [e]	-	-	200			5	5			5	5
Total Trips			**1,245**			**49**	**41**			**56**	**50**

Notes:

a. Trip generation rates are based on the 10th edition of the Trip Generation Manual, Institute of Transportation Engineers (ITE).

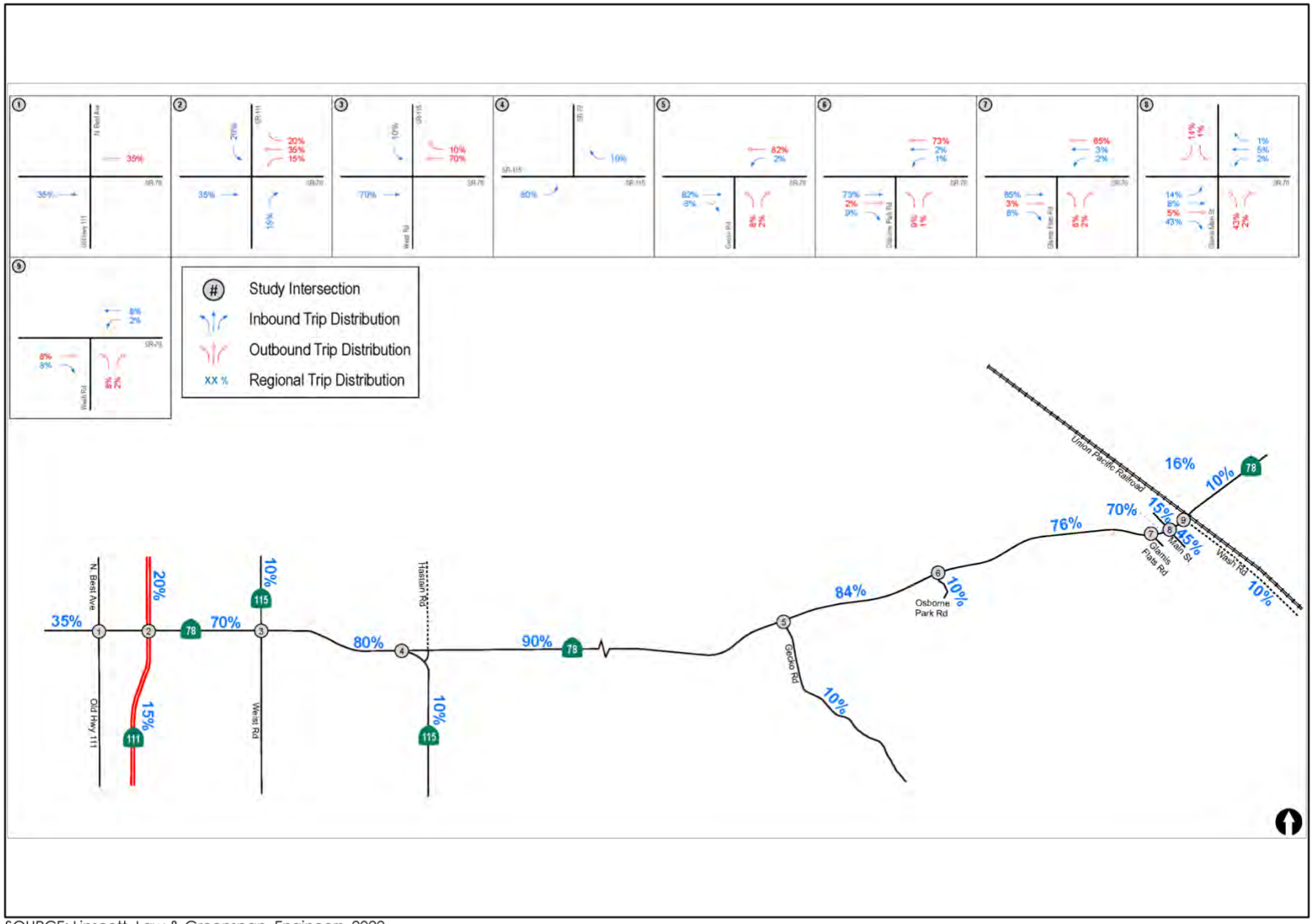
b. Weekday ADT rate not provided by ITE. Therefore, the Saturday ADT rate of 12.48 trips per service bay was used.

c. "Small Office Building" Rate assumed.

d. Weekday ADT rate not provided by ITE. Therefore, the SANDAG ADT rate of 4 trips per site was used.

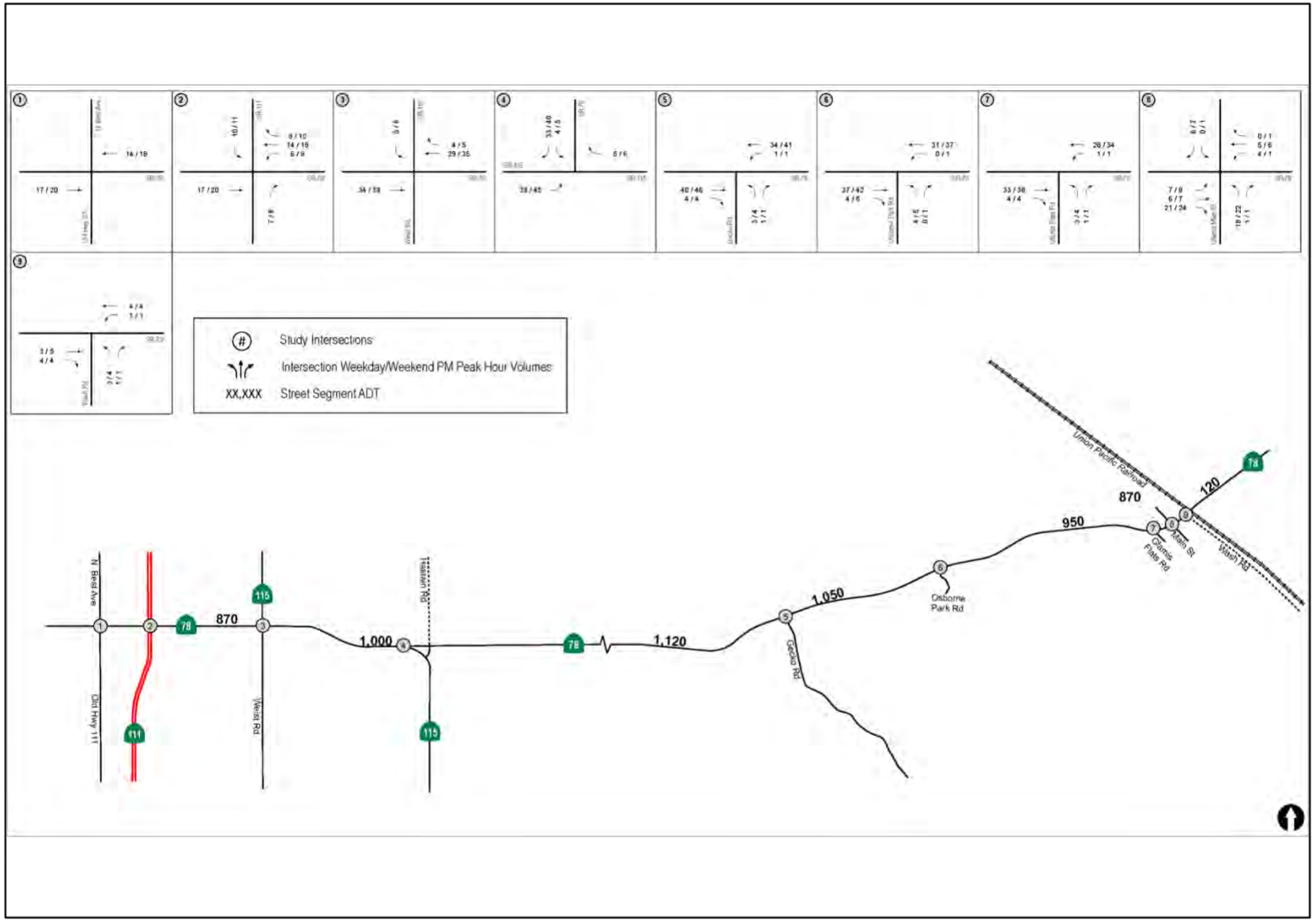
e. No additional vendors are expected as a part of the Project. However, in order to provide a conservative trip generation calculation, an additional 200 ADT was assumed.

Source: Linscott, Law & Greenspan 2022 (Appendix L).



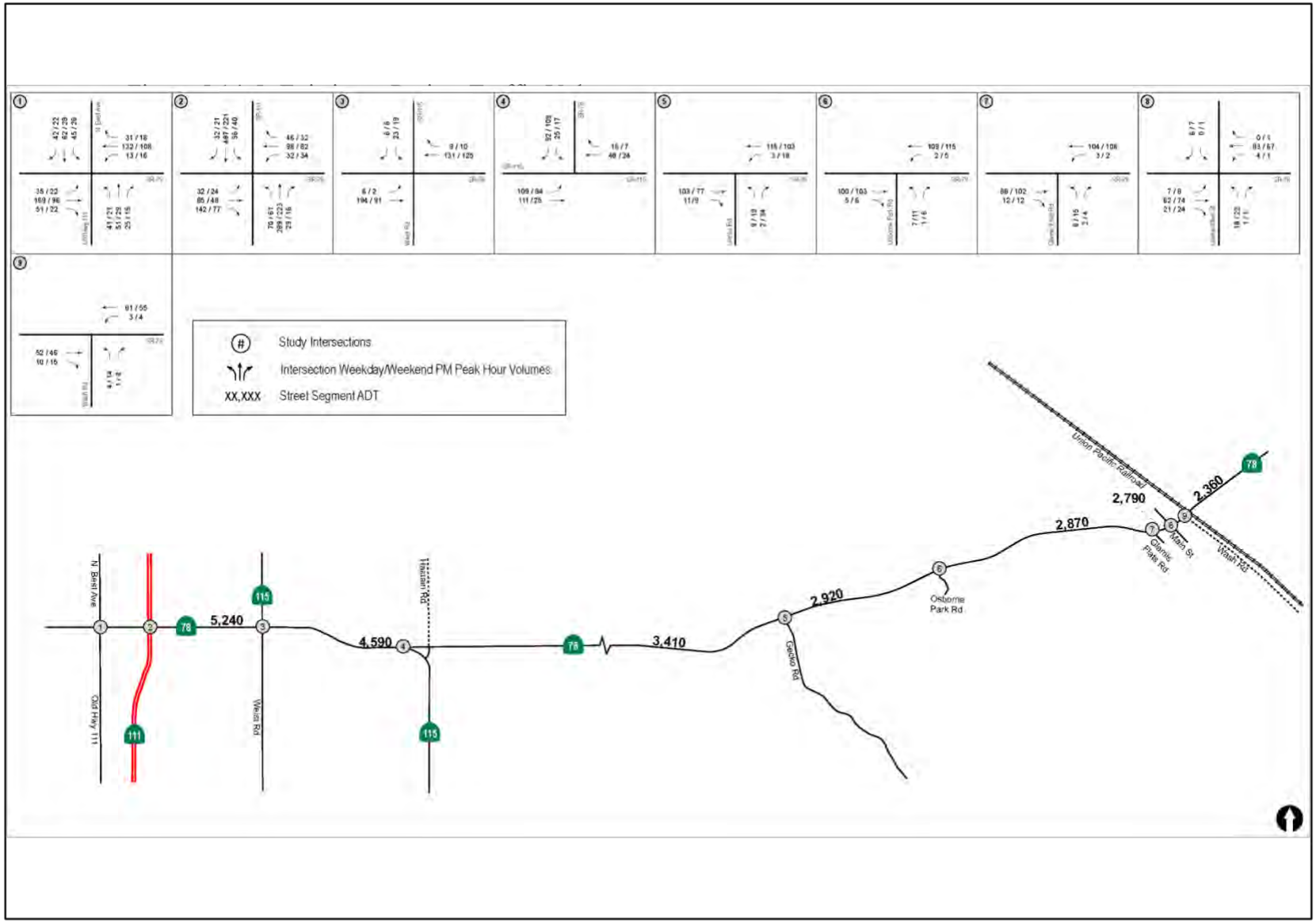
SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Project Traffic Distribution
Glamis Specific Plan
Figure 5.14-3



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Project Traffic Volumes
Glamis Specific Plan
Figure 5.14-4



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Existing + Project Traffic Volumes
Glamis Specific Plan
Figure 5.14-5

Guidelines for Determination of Significance

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

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4. Result in inadequate emergency access?

Impact 5.10-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

ANALYSIS OF NEAR-TERM SCENARIOS

Existing + Project

Intersection Analysis

Table 5.14-9 summarizes the Existing + Project intersection operations. As seen in Table 5.14-9, with the addition of proposed Specific Plan traffic, all GSPA intersections are calculated to continue to operate at LOS C or better. No significant impacts are identified.

Segment Operations

Table 5.14-10 summarizes the Existing + Project segment operations. As seen in Table 5.14-10, with the addition of proposed Specific Plan traffic, the GSPA segments are calculated to continue to operate at LOS C or better. No significant impacts are identified.

ANALYSIS OF LONG-TERM SCENARIOS

Year 2050 Traffic Volumes

Based on previous traffic studies conducted in the area and discussions with Caltrans, long-term volumes were estimated by applying a growth rate of 1.0% per year for 31 years (2019 through 2050) to the existing volumes.

Figure 5.14–6 depicts the long-term Year 2050 Traffic Volumes, and Figure 5.14–7 depicts the Year 2050 + Project Traffic Volumes.

TABLE 5.14-9 NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Existing + Project + Cumulative Projects		Net Change [c]	Effect Type
			Delay [a]	LOS [b]	Delay	LOS	Delay	LOS		
1. SR 78 / Old Highway 111 / Best Avenue	Signal	Wkday	15.5	B	15.6	B	16.1	B	0.6	None
		Wkend	15.3	B	15.3	B	15.3	B	0.0	None
2. SR 78 / SR 111	Signal	Wkday	24.8	C	27.9	C	30.4	C	5.6	None
		Wkend	21.2	C	21.7	C	22.2	C	1.0	None
3. SR 78 / SR 115 (west)	MSSC [d]	Wkday	11.8	B	12.8	B	13.5	B	1.7	None
		Wkend	10.0	A	10.7	B	10.9	B	0.9	None
4. SR 78 / SR 115 (east)	MSSC	Wkday	10.6	B	11.4	B	11.9	B	1.3	None
		Wkend	9.3	A	9.7	A	9.8	A	0.5	None
5. SR 78 / Gecko Road	MSSC	Wkday	10.0	A	10.8	B	11.1	B	1.1	None
		Wkend	9.4	A	10.1	B	10.2	B	0.8	None
6. SR 78 / Osborne Park Road	MSSC	Wkday	9.8	A	10.6	B	10.8	B	1.0	None
		Wkend	9.4	A	10.0	A	10.1	B	0.7	None
7. SR 78 / Glamis Flats Road	MSSC	Wkday	9.8	A	10.4	B	10.6	B	0.8	None
		Wkend	9.7	A	10.3	B	10.5	B	0.8	None
8. SR 78 / Glamis Mainstreet (future access)	MSSC	Wkday	-[e]	-	10.2	B	10.4	B	-	None
		Wkend	-	-	10.2	B	10.4	B	-	None
9. SR 78 / Wash Road	MSSC	Wkday	9.9	A	9.9	A	10.0	A	0.1	None
		Wkend	9.4	A	9.5	A	9.6	A	0.2	None

Notes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Change in delay due to project.
d. MSSC = Minor Street Stop-Controlled intersection. Worst-case delay reported.
e. Intersection does not exist under existing conditions.
Wkday= Weekday PM Peak Hour (5:00-7:00 PM)
Wkend= Weekend PM Peak Hour (5:00-7:00 PM)
Source: Linscott, Law & Greenspan 2022 (Appendix L).

SIGNALIZED	
Delay	LOS
0.0 ≤ 10.0	A
10.1 to 20.0	B
20.1 to 35.0	C
35.1 to 55.0	D
55.1 to 80.0	E
≥ 80.1	F

UNSIGNALIZED	
Delay	LOS
0.0 ≤ 10.0	A
10.1 to 15.0	B
15.1 to 25.0	C
25.1 to 35.0	D
35.1 to 50.0	E
≥ 50.1	F

TABLE 5.14-10 NEAR-TERM STREET SEGMENT OPERATIONS

Street Segment	Existing Capacity (LOS E)[a]	Existing			Existing + Project			Existing + Project + Cumulative Projects			Net Change [e]	Effect Type
		ADT	LOS	V/C	ADT	LOS	V/C	ADT	LOS	V/C		
SR 78												
Old Highway 111 / Best Avenue to SR 115 (west)	16,200	4,370	C	0.270	5,240	C	0.323	5,760	C	0.356	0.086	None
SR 115 (west) to SR 115 (east)	16,200	3,590	B	0.222	4,590	C	0.283	5,020	C	0.310	0.088	None
SR 115 (east) to Gecko Road	16,200	2,290	B	0.141	3,410	B	0.210	3,680	B	0.227	0.086	None
Gecko Road to Osborne Park Road	16,200	1,870	A	0.115	2,920	B	0.180	3,140	B	0.194	0.078	None
Osborne Park Road to Glamis Flats Road	16,200	1,920	B	0.119	2,870	B	0.177	3,100	B	0.191	0.073	None
Glamis Flats Road to Glamis Mainstreet (future access)	16,200	1,920	B	0.119	2,790	B	0.172	3,020	B	0.186	0.068	None
Glamis Mainstreet (future access) to Wash Road	16,200	1,920	B	0.119	2,120	B	0.131	2,350	B	0.145	0.027	None
East of Wash Road	16,200	2,240	B	0.138	2,360	B	0.146	2,630	B	0.162	0.024	None

Notes:

a. The capacity of the roadway at Level of Service E.

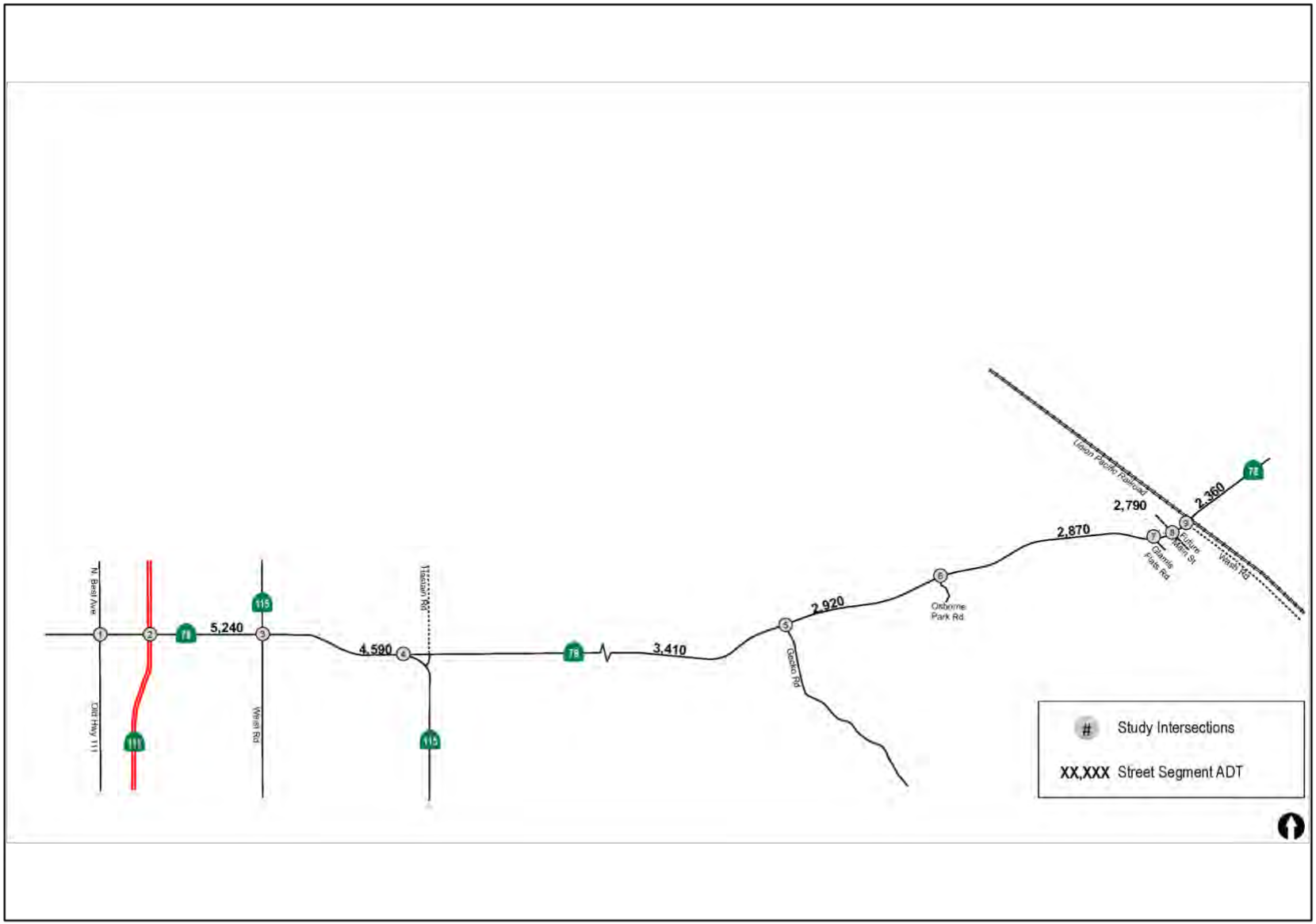
b. Increase in V/C ratio due to the addition of project traffic.

ADT = Average Daily Traffic

LOS = Level of Service

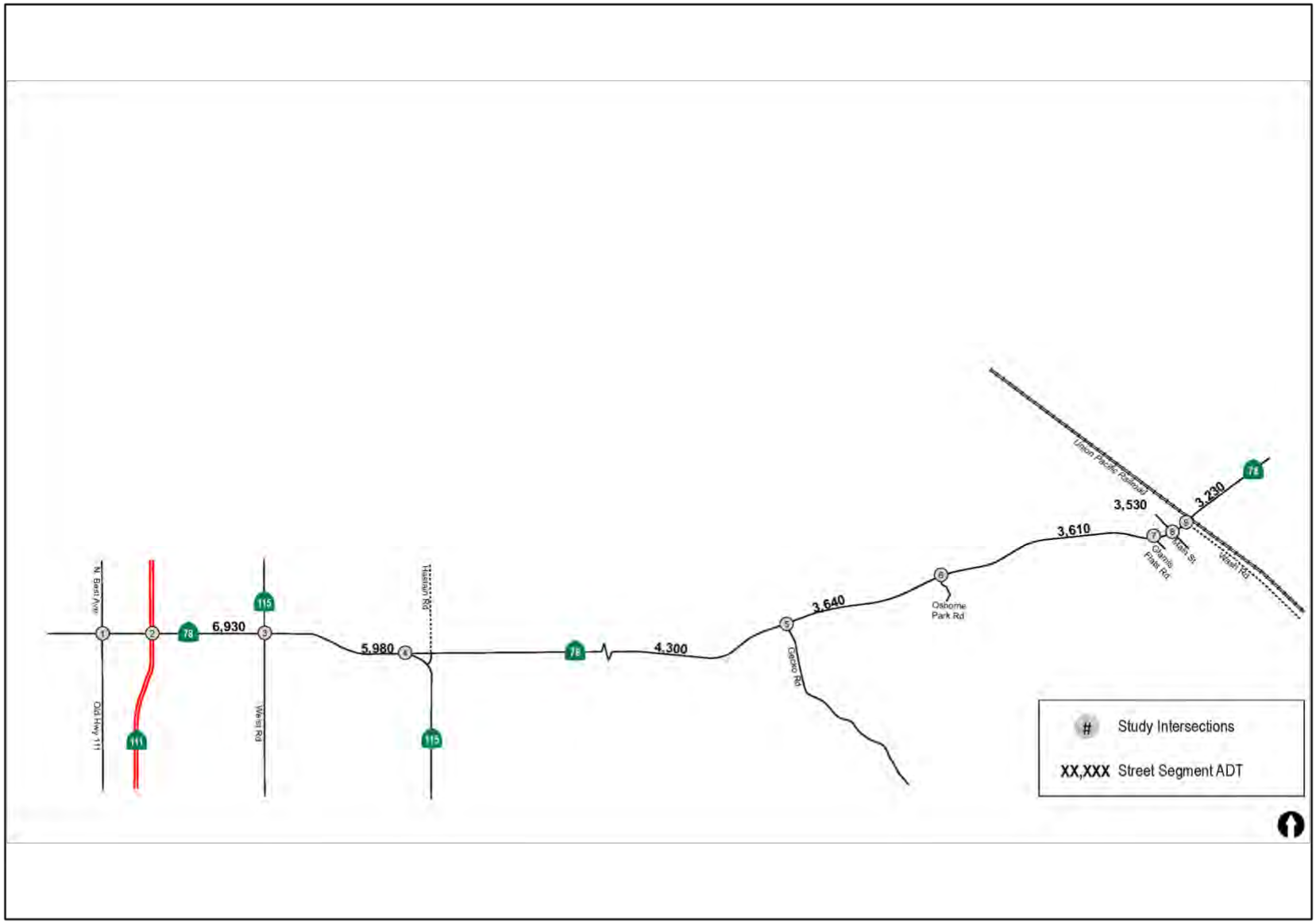
V/C = Volume to Capacity ratio.

Source: Linscott, Law & Greenspan 2022 (Appendix L).



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Year 2050 Traffic Volumes
Glamis Specific Plan
Figure 5.14-6



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Year 2050 + Project Traffic Volumes
Glamis Specific Plan
Figure 5.14-7

Year 2050 Segment Operations

Table 5.14-11 summarizes the Year 2050 segment operations. As seen in Table 5.14-11, all GSPA segments are calculated operate at LOS C or better.

Year 2050 + Project Segment Operations

Table 5.14-11 summarizes the Year 2050 + Project segment operations. As seen in Table 5.14-11, with the addition of proposed Specific Plan traffic, all GSPA segments are calculated to continue to operate at LOS C or better.

TABLE 5.14-11 YEAR 2050 STREET SEGMENT OPERATIONS

Street Segment	Capacity (LOS E)[a]	Year 2050			Year 2050 + Project			Impact Type
		ADT [b]	LOS [c]	V/C [d]	ADT	LOS	V/C	
SR 78								
Old Highway 111 / Best Avenue to SR 115 (west)	16,200	5,720	C	0.353	6,950	C	0.429	None
SR 115 (west) to SR 115 (east)	16,200	4,700	C	0.290	6,100	C	0.377	None
SR 115 (east) to Gecko Road	16,200	3,000	B	0.185	4,580	C	0.283	None
Gecko Road to Osborne Park Road	16,200	2,450	B	0.151	3,400	B	0.210	None
Osborne Park Road to Glamis Flats Road	16,200	2,520	B	0.156	3,360	B	0.207	None
Glamis Flats Road to Wash Road	16,200	2,520	B	0.156	2,990	B	0.185	None
East of Wash Road	16,200	2,930	B	0.181	3,110	B	0.192	None

Notes:
a. The capacity of the roadway at Level of Service E; b. Average Daily Traffic; c. Level of Service; d. The Volume to Capacity ratio.
Linscott, Law & Greenspan 2022

Implementation of the proposed Specific Plan would add traffic to roadway segments and intersections along SR-78 during construction and operation. However, the additional traffic would not result in an exceedance of LOS C. Additionally, the proposed Specific Plan would not affect bicycle facilities, pedestrian facilities or public transit. Therefore, conflicts with the Imperial County General Plan Circulation and Scenic Highways Element are considered *less than significant.*

Impact 5.10-2: Conflict(s) or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b) relative to Vehicle Miles Traveled?

According to the ITE guidelines, it is recommended that local-serving retail projects be presumed to have less than significant VMT impacts and regional-serving retail projects be presumed to have significant VMT impacts if they increase VMT above the level that would occur for conditions

without the proposed Specific Plan. As noted in OPR's technical advisory, "by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact."

While the GSPA is not located in an urban area, the primary objective of the proposed Specific Plan is to formalize the site and provide services and amenities that patrons of the dunes would otherwise have to drive long distances to access. This includes food services, repair services, and retail services. The proposed Specific Plan's proposed land uses are intended to serve patrons of the dunes and will not operate year-round due to the long distance from population bases and the extreme heat.

Therefore, the OPR guidance pertaining to locally serving retail projects is applicable to the proposed Specific Plan. The proposed Specific Plan land uses will improve service-destination proximity, shorten trips, and reduce VMT. As such, the Project is presumed to have a *less-than-significant* transportation impact and does not require a detailed VMT analysis (LLG, 2022: Appendix L).

Impact 5.10-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Primary circulation flow will be provided via the proposed "Glamis Mainstreet", to be located between Glamis Flats Road and Wash Road, just southwest of the Glamis Beach Store, which will interconnect by crossing SR-78. Fencing along SR-78 to assist in prohibiting access to the site other than at establishes intersections is recommended commensurate with the development of Glamis Mainstreet. An OHV tunnel running under SR-78 connecting the northern and southern portions of the GSPA is recommended to be constructed at the time the Planning Areas north of SR-78 are developed.

As noted previously, the primary objective of the proposed Specific Plan is to formalize the site and provide services and amenities to serve the existing patrons of the dunes. It is not expected that the proposed Specific Plan will draw a significant number of new users to the dunes. To provide a conservative analysis, it was assumed that the proposed Specific Plan will increase existing dune related trips to the area by 30%. These new trips were assigned to Gecko Road, Osborne Park Road, Glamis Flats Road, and Wash Road, which provide direct access to the campgrounds for the majority of the visitors to the northern dunes.

However, since future proposed Specific Plan amenities accessible via the proposed "Glamis Mainstreet" are expected to draw a portion of the existing and Project trips, an analysis of the future SR-78 / Glamis Mainstreet intersection has been conducted. Since the specific land-uses to be developed have not yet been determined, the analysis has been conducted assuming a very conservative estimate of 100 weekday and 160 weekend peak hour trips to / from Glamis Mainstreet north of SR-78, and 150 weekday and 230 weekend peak hour trips to / from Glamis Mainstreet

south of SR-78, based on expected use. Construction of the Glamis Mainstreet has the potential to interrupt traffic on SR-78, Development and implementation of a Traffic Control Plan in conjunction with Caltrans would minimize these interruptions and any effect they have on traffic would be less than significant.

Figure 5.14-8 depicts the assumed geometric lane configuration as well as the estimated Project Buildout trips at the future SR-78 / Glamis Mainstreet intersection.

Table 5.14-12 summarizes the Project Buildout operations at the future SR-78 / Glamis Mainstreet intersection. As seen in Table 5.14-8, the intersection is calculated to operate acceptably at LOS C or better under Weekday and Weekend PM peak hour conditions.

TABLE 5.14-12 SR-78/GLAMIS MAINSTREET INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Delay [a]	LOS [b]
SR 78 / Glamis Mainstreet	MSSC	Wkday	10.4	B
		Wkend	10.4	B

Linscott, Law & Greenspan 2022

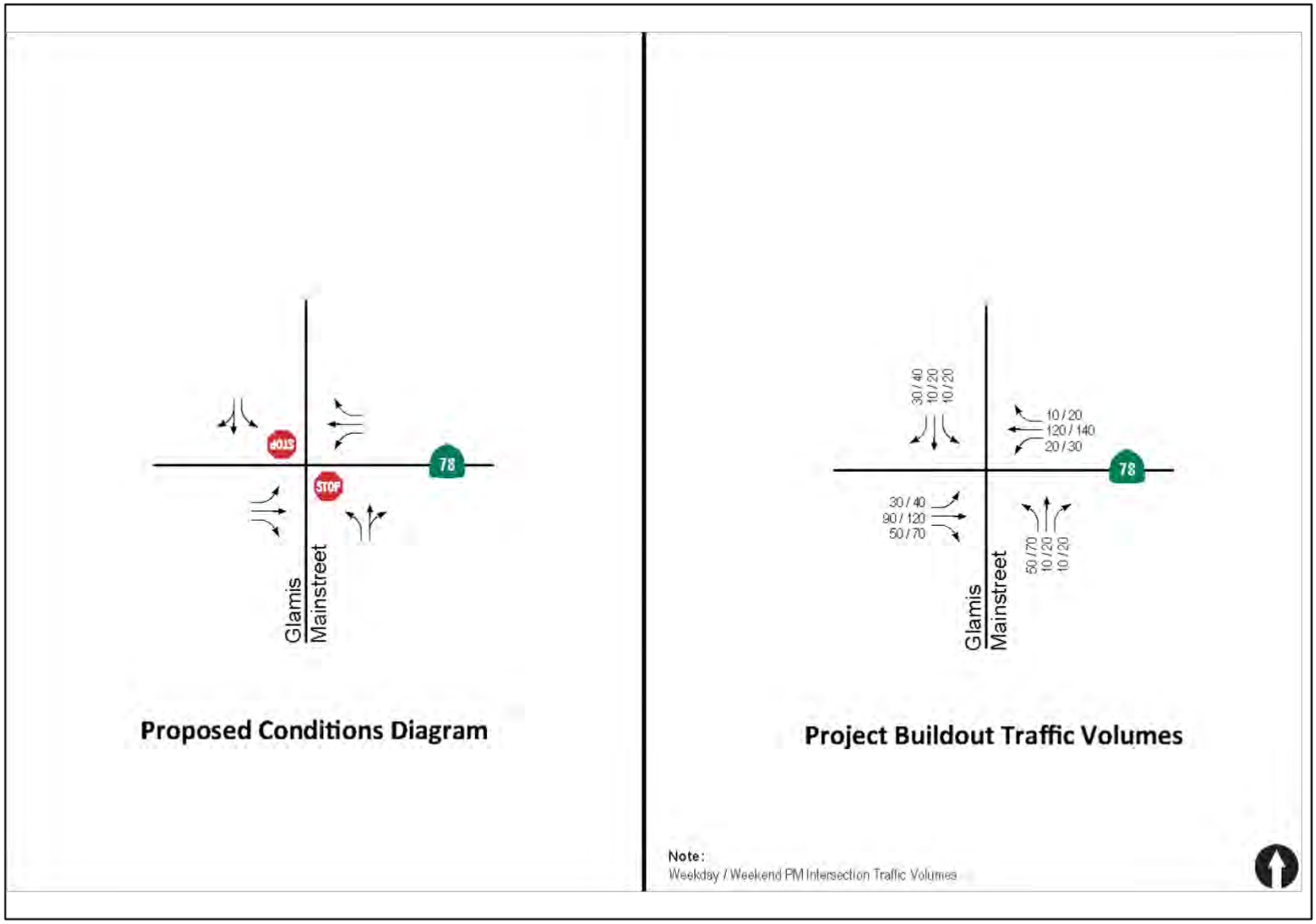
Additional Access Points

Access to Planning Areas 5 and 6, just east of the Union Pacific Railroad (UPRR), via SR-78 is proposed. Given the very low expected traffic volumes, signalization of the intersection is likely not needed, however, dedicated left-turn lanes on SR-78 are recommended. In addition, a secondary and emergency only access point to/from the Project site to SR-78 should be provided on the west side of the GSPA, immediately south of SR-78.

The proposed Specific Plan would have no hazardous design features, such as sharp curves or dangerous intersections, that would create a traffic hazard. Implementation of the mitigation measures described below would reduce the impacts to below a level of significance.

Impact 5.10-4: Inadequate emergency access?

The proposed Specific Plan would not block any major thoroughfares; however, it would lead to an increase in traffic and add an intersection to SR-78 which could slow emergency response times. However, implementation of the mitigation measures described below would reduce the impacts to below a level of significance.



SOURCE: Linscott, Law & Greenspan, Engineers, 2022.

Glamis Mainstreet Conditions
Glamis Specific Plan
Figure 5.14-8

5.14.5 Mitigation Measures

The following Mitigation Measures would reduce impacts to below a level of significance.

MM T-1: Traffic-related improvements:

- Construct the future intersection of SR-78 / Glamis Mainstreet per the sketch provided in Appendix F in the applicant prepared traffic study.
- Conduct an annual signal warrant assessment at the future intersection of SR-78 / Glamis Mainstreet to determine when / if signalization should be implemented.
- Install fencing along SR-78 to limit vehicle access to the Specific Plan areas to established intersections.
- An OHV tunnel running under SR-78 connecting the northern and southern portions of the GSPA is recommended to be constructed at the time the Planning Areas north of SR-78 are developed.
- Access to Planning Areas 5 and 6, just east of the UPRR, via SR-78 will be required. Given the very low expected traffic volumes, signalization of the intersection is likely not needed, however, dedicated left- turn lanes on SR-78 are recommended.
- A secondary emergency only access point to/from the GSPA to SR-78 shall be provided on the west side of the GSPA.

Level of Significance After Mitigation

As a result, impacts related to the increase of traffic hazards as a result of the GSPA would be less than significant.

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5.15 Utilities and Service Systems

This section describes the existing utility and service systems in the vicinity of the Glamis Specific Plan Area (GSPA) and identifies the potential physical environmental impacts that would result from provision of services to the proposed Specific Plan.

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a public scoping meeting was conducted, and written comments were received from agencies and the public. No comments related to utilities and service systems were received.

Issues Scoped Out

The Imperial County Planning and Development Services Department determined in the Initial Study (IS), located in Appendix A-2, that the following environmental issue areas resulted in no impact and was scoped out of requiring further review in this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the IS and additional information regarding this issue.

- Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? The Applicant will comply with federal, state and local statutes related to solid waste. No impacts would occur.

5.15.1 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

State

Senate Bill 610 and 221

Senate Bill (SB) 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001) amended State of California law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 are companion measures that seek to promote more collaborative planning between local water suppliers and cities and counties. Both statutes require detailed information regarding water availability to be provided to city and county decision-makers prior to approval of specified large development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Both measures recognize local control and decision making regarding the availability of water for projects and the approval of projects.

Water Code Sections 10910–10915 require lead agencies to identify the public water system that may supply water for a proposed development project and to request from that public water system a water supply assessment (WSA) for the proposed Projects. The purpose of the WSA is to demonstrate that the public water system has sufficient water supplies to meet the water demands associated with the proposed Projects in addition to meeting the existing and planned future water demands projected for the next 20 years. A WSA is required for:

- A proposed residential development of more than 500 dwelling units.
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- A proposed hotel or motel, or both, having more than 500 rooms.
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40-acres of land, or having more than 650,000 square feet of floor area.
- A mixed-use development that includes one or more of the uses described above.
- A development that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling-unit project.
- For lead agencies with fewer than 5,000 water service connections, any new development that would increase the number of water service connections in the service area by 10 percent or more.

Local

Imperial Integrated Regional Water Management Plan

The Imperial Integrated Regional Water Management Plan (IRWMP) serves as the governing document for regional water planning to meet present and future water resource needs and demands by addressing such issues as additional water supply options, demand management and determination and prioritization of uses and classes of service provided. In November 2012, the Imperial County Board of Supervisors approved the Imperial IRWMP, and the City of Imperial City Council and the IID Board of Directors approved it in December 2012. Through the IRWMP process, IID presented various options to the region's stakeholders that would be implemented in the event long-term water supply augmentation is needed, such as water storage and banking, recycling of municipal wastewater, and desalination of brackish water.

Groundwater Management Ordinance

In 1998, the County adopted, and in 2015 amended, a comprehensive Groundwater Management Ordinance to preserve and manage groundwater resources within the County. The Groundwater Ordinance, codified as Division 22 of Title 9 of the Imperial County Code, is implemented by the Planning Commission acting upon the direction of the Board of Supervisors. The Groundwater Ordinance provides the County with various regulatory tools that are designed to avoid or minimize the impact of existing and proposed groundwater extraction activities on groundwater resources and other users, such as overdraft or excessive drawdown. The Groundwater Ordinance requires that existing extraction facilities be permitted and registered with the County. The existing groundwater wells in the GSPA are permitted and regulated by an attachment to CUPs 13-0060 and 13-0059, respectively, which sets site-specific conditions for the onsite wells.

County of Imperial General Plan

The Imperial County General Plan provides goals, objectives, policies, and programs regarding the preservation and use of water. Table 5.15-1 provides a consistency analysis of the applicable Imperial County General Plan goals and objectives as they relate to the proposed project. While the EIR analyzes the project's consistency with the General Plan pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

TABLE 5.15-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Agricultural Element		
Goal 4: Water Availability and Conservation: • Maximize the inherent productivity of Imperial County's agricultural resources by ensuring future availability of adequate and affordable irrigation water and by managing water such that it is used effectively and not wasted.:	Yes	The proposed Specific Plan proposes to utilize water from an existing well and a proposed new well within the Glamis Specific Plan Area (GSPA) to provide water for the proposed uses. The proposed Specific Plan does not rely on any irrigation water nor water that would be suitable for agricultural purposes, and therefore, would not affect the availability of irrigation water for agricultural use. The proposed Specific Plan implements water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible.

TABLE 5.15-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element (COSE)		
COSE Goals 6: The County will conserve, protect, and enhance water resources in the County. • COSE Objective 6.1: Ensure the use and protection of all the rivers, waterways, and groundwater sources in the County for use by future generations. • COSE Objective 6.4: Eliminate potential surface and groundwater pollution through regulations as well as educational programs.	Yes	The proposed Specific Plan conserves, protects and enhances water resources in the County through implementation of water efficient appliances and other water conservation measures (e.g., xeriscape landscaping) that would reduce water use to the maximum extent possible.
Water Element (WE)		
Adequate Domestic Water Supply WE Goal 1: The County will secure the provision of safe and healthful sources and supplies of domestic water adequate to assure the implementation of the County General Plan and the long-term continued availability of this essential resource. • WE COSE Objective 1.1 The efficient and cost-effective utilization of local and imported water resources through the development and implementation of urban use patterns.	Yes	The water supply assessment (WSA) determined that there would be sufficient water available to meet the proposed Specific Plan's demand. The permitting of a public water treatment system which would treat ground water that is extracted from existing and proposed onsite wells is currently in progress. The water treatment plant will comply with California standards for drinking water and is being constructed to meet the needs of the current uses and with room for expansion.
Adequate Domestic Water Supply Policy 1: The efficient regulation of land uses that economizes on water consumption, enhances equivalent dwelling unit demand for domestic water resources, and that makes available affordable resources for continued urban growth and development.	Yes	The permitting of a water treatment system which would treat ground water that is extracted from existing and proposed onsite wells is currently in progress. The water treatment plant complies with California standards and is being constructed to meet the needs of the current uses and with room for expansion. Therefore, the proposed Specific Plan is consistent with and results in the implementation of this policy of the General Plan.
Coordinated Water Management Goal 5: Water Resources shall be managed effectively and efficiently through inter-agency and inter-jurisdictional coordination and cooperation.	Yes	The proposed Specific Plan sets forth continued cooperation and coordination between Imperial County and other Local, State and Federal agencies, water resources can be conserved and managed effectively and efficiently for all approved beneficial purposes. Therefore, the proposed Specific Plan is consistent with and results in the implementation of this policy of the General Plan.

TABLE 5.15-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN UTILITY GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Coordinated Water Management Policy 1: Encourage and provide inter-agency and interjurisdictional coordination and cooperation for the management and wise use of water resources for contact and non-contact recreation, groundwater recharge, hydroelectric energy production, and wildlife habitat as well as for domestic and irrigation use.	Yes	The proposed Specific Plan sets forth continued cooperation and coordination between Imperial County and other Local, State and Federal agencies involved in water resources conservation. Water resources are conserved and managed effectively and efficiently for all approved beneficial purposes. Therefore, the proposed Specific Plan is consistent with and results in the implementation of this policy of the General Plan.

Source: Imperial County, 1997, 2015, 2016.

5.15.2 Existing Conditions

Environmental Setting

The Imperial Valley area is located within the south-central part of Imperial County and is bound by Mexico on the south, the Algodones Sand Hills on the east, the Salton Sea on the north and San Diego County on the northwest, and the alluvial fans bordering the Coyote Mountains and the Yuha Desert to the southwest. While the Imperial Irrigation District (IID) supplies water and electrical power to most users in the Imperial Valley, the GSPA is outside IID's water service area. Operations are divided between a water division responsible for distribution and collection of water, and a power division responsible for generation and distribution of electrical power. Natural gas service in the area is provided by the Southern California Gas Company.

Water supplies for existing uses within the GSPA are currently provided by an existing on site well (CUP #13-0059). This well is designed specifically for domestic water use to serve a residence and its ancillary buildings. This well was constructed to domestic water well standards and cannot be used as a potable water source for the larger project area. It is currently authorized to pump 1.5 acre-feet (AF) per year. There is one permitted public water system well (CUP #13-0060) that supplies water to the yet to be permitted Glamis Beach Store public water system, System No. 1300684. It also is currently authorized to pump 1.5 AF per year. Average annual water use within the GSPA has ranged from 0 to 1.5 AFY.

Groundwater Basin

The GSPA is located within the Amos Valley Groundwater Basin which is part of the East Mesa Groundwater Management Planning Area. The Amos Valley Groundwater Basin underlies a southeast trending valley in southeastern Imperial County. Elevation of the valley floor ranges from about 250 to 800 feet above mean sea level (amsl). The basin is bounded by non-water bearing rocks of the Chocolate Mountains on the north and northeast and by the San Andreas fault zone on the south and southeast. Low-lying alluvial drainage divides define the eastern and western boundaries.

Elevations in the Chocolate Mountains average about 2,700 feet. Much of the northern portion of the basin lies within the Chocolate Mountains Aerial Gunnery Range (CMAGR) (California Dept. of Water Resources, 2004).

Water Supplies

The groundwater aquifer in the GSPA is estimated to have a capacity of approximately 1 to 1.5 million acre feet (MAF) per year. Water supplies for existing uses within the GSPA are currently provided by an existing on site well (CUP #13-0059). This well is designed specifically for domestic water use to serve a residence and its ancillary buildings. This well was constructed to domestic water well standards and cannot be used as a potable water source for the larger project area. It is currently authorized to pump 1.5 acre-feet (AF) per year. There is one permitted public water system well (CUP #13-0060) that supplies water to the yet to be permitted Glamis Beach Store public water system, System No. 1300684. It also is currently authorized to pump 1.5 AF per year. Additional water is trucked in during periods of high visitation such as Camp RZR and other special events. Current water service is provided by an existing water treatment system to service existing uses of the GSPA. The existing water treatment system has been upgraded and a water treatment plant complying with California standards is being permitted to meet the needs of the current uses and with room for expansion. A public water system permit is expected to be issued in the Spring of 2023 by the Imperial County Public Health Department Division of Environmental Health.

Wastewater Treatment

Wastewater generated by the Glamis Beach Store, restaurant and bar is currently being discharged into an existing septic tank located near those buildings. When the septic tanks are nearing capacity, wastewater is transported off-site.

Electricity

Uses in the GSPA currently rely on diesel generators for all of their electrical power needs.

5.15.3 Analysis of Project Effects and Significance Determination

Guidelines for Determination of Significance

The proposed Specific Plan would be considered to have a significant impact if it would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

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

Analysis

Impact 5.15-1: 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?

Water Treatment Facilities

Water supplies for existing uses within the GSPA are currently provided by an existing on site well (CUP #13-0059). This well is designed specifically for domestic water use to serve a residence and its ancillary buildings. This well was constructed to domestic water well standards and cannot be used as a potable water source for the larger project area. It is currently authorized to pump 1.5 acre-feet (AF) per year. There is one permitted public water system well (CUP #13-0060) that supplies water to the yet to be permitted Glamis Beach Store public water system, System No. 1300684. It also is currently authorized to pump 1.5 AF per year. An as yet unpermitted Reverse Osmosis Water Treatment Plant is currently located onsite and groundwater is treated to potable water standards to service existing uses within the GSPA. The water treatment plant has a production capacity of 15 gallons per minute, which amounts to 0.0216 million gallons per day (mgd) or 24.12 acre-feet per year. Residual material from this facility is mostly liquids with solids and is discharged to a holding tank. The residual liquid would be mixed with water from domestic water well and would be used for dust suppression. A public water system permit is expected to be issued in the Spring of 2023 by the Imperial County Public Health Department Division of Environmental Health. Ultimately this system will be re-permitted as a community water system once development reaches a certain point. An NPDES permit is currently not required but may be as the volume of water produced increases.

Wastewater Treatment Facilities

Wastewater generated by the Glamis Beach Store, restaurant and bar is currently being discharged into an existing septic tank located near to those buildings.

Stormwater Drainage Facilities

The existing topography and drainage of the project site generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the project site (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR. The drainage flows from these three concrete culverts

underneath the UPRR, flow through and/or around portions of the existing project site (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All planning areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

The conceptual grading plan would provide flood protection for future land uses within the entire project site and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses consistent with California drainage law. The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications would re-direct the drainage around each of the planning areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for Planning Area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR 78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the Southwest under the UPRR, via existing concrete culverts.

Impact 5.15-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Non-potable water for the existing RV Park and Glamis Beach Store is provided via two existing on-site water wells which have a collective allocation of 3 AF. A new well would be developed as part of the Specific Plan' implementation to increase the allocation to 25 AF. According to the WSA (Appendix L) prepared in support of this Draft EIR, water demand for Phase One is estimated to be 10.66 AF per year. This assumes the demand would be year-round, however, the Project would only require this amount on a seasonal basis so the anticipated demand would be less than half this amount. Special events would bring in water from outside the Project site and would not utilize groundwater from wells. Development of Phases Two through Four would only result in minor increases in the overall annual use. Overall annual use would be less than the 25 AF the Applicant is asking for in their revised CUP. Given the basin's recharge is 200 AF per year impacts would be less than significant.

Impact 5.15-3: Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Wastewater treatment for the existing GSPA is provided by an on-site septic system and leach field. Implementation of the proposed Specific Plan would result in the need for expanded wastewater

treatment options. As new development is implemented, this wastewater plant will be expanded as determined by the regulatory agencies. Future wastewater treatment needed (i.e., secondary and tertiary treatment) will be determined by the amount of wastewater forecasted to be generated by each phase of structural improvement. According to the Water Supply Assessment (WSA) (Appendix K) prepared for the project operational water use would be 3,011,440.5 gallons per year, Assuming an average water use of 82 gallons per person per day (USEPA 2022) this equates to 36,724 people. Assuming a wastewater generation of 40 gallons per person per day, this would result in a wastewater generation of 1,468,995 gallons of wastewater per day which would be generated predominantly in the winter season. The proposed Specific Plan development activities will include water efficient appliances (i.e., sinks, toilets, showers, wash-down areas, etc.) that will minimize potential water waste and conserve water to the maximum extent possible.

No development or expansion of an existing use shall be allowed until provisions have or will be made to provide for the treatment of all wastewater, meeting applicable regulatory requirements. If allowed by regulations, septic systems may be considered, however if a central treatment system is constructed, all new development shall connect to this system. Any application for development shall include evidence that such system has the adequate capacity. Impacts would be less than significant.

Impact 5.15-4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Implementation of the proposed Specific Plan would result in an increase in solid waste generation during construction and operation. Solid waste would be disposed of using a locally-licensed waste hauling service. It is anticipated that solid waste would continue to be hauled to the landfill nearest the GSPA. The Salton City Solid Waste Site (13-AA-0011) is located at 935 W. Highway 86 Salton City, CA 92275. As of September 2018, this landfill had approximately 1,264,170 cubic yards of remaining capacity and was estimated to remain in operation through 2038 (CalRecycle, 2019b).

5.15.4 Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

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5.16 Tribal Cultural Resources

This section addresses potential direct and indirect environmental impacts to tribal cultural resources that would result from implementation of the proposed Specific Plan. The following discussion addresses the existing conditions in the Glamis Specific Plan Area (GSPA), identifies applicable regulations, analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Specific Plan, as applicable.

The analysis in this section is based on the *Class III Cultural Resources Inventory Report* prepared by ASM Affiliates which is included as Appendix F-1 (ASM Affiliates, 2019: Appendix F-1).

Scoping Issues Addressed

During the scoping period for the proposed Specific Plan, a scoping meeting was conducted, and written comments were received from agencies and the public. The following issues related to Cultural Resources and Native American Tribal Consultations were raised by the Native American Heritage Commission (NAHC) and are addressed in this section:

- Assembly Bill (AB) 52 applies to any project for which a Notice of Preparation (NOP), a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.
- NAHC recommends that lead agencies consult with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the Project.
- Both Senate Bill (SB) 18 and AB 52 have tribal consultation requirements.
- NAHC provided recommendations for Cultural Resource Assessments.

5.16.1 Environmental Setting

Refer to Section 5.4 *Cultural Resources* of this Draft EIR for the history and background of the Project site. The GSPA was utilized prehistorically by a variety of Native American groups, including the Desert Cahuilla, the Quechan and the Halchidhoma, and the Kamia. Six successive periods, each with distinctive cultural patterns, may be defined for the Colorado Desert, extending back in time over a period of more than 12,000 years. They include: (1) Early Man (Malpais); (2) Paleoindian (San Dieguito); (3) Archaic (Pinto and Amargosa); (4) Late Prehistoric (Patayan); (5) Ethnohistoric Native American occupation; and (6) Historic Euro-American occupation.

5.16.2 Regulatory Setting

Federal

Native American Graves Protection and Repatriation Act (United States Code, Title 25, Sections 3001 et seq.)

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

State

Assembly Bill 52

California Assembly Bill 52 of 2014 (AB 52) was enacted on July 1, 2015 and expands the California Environmental Quality Act (CEQA) by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states that the lead agency avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources:

1. "Sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" and meets either of the following criteria: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
2. A cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the formal consultation process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18

SB 18 of 2004 (California Government Code §65352.3) requires local governments to contact, refer plans to and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the California Office of Planning and Research's (OPR's) Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Native American Historic Resource Protection Act

PRC Sections 5097 et seq. codify the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

"No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres."

California Health and Safety Code

California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

Local

County of Imperial General Plan

The County of Imperial General Plan (General Plan) provides goals, objectives, and policies for the identification and protection of significant cultural resources. Specifically, the Conservation and Open Space Element of the General Plan calls for the protection of cultural resources and scientific sites and contains requirements for cultural resources that involve the identification and documentation of significant historic and prehistoric resources and the preservation of

representative and worthy examples. The Conservation and Open Space Element also recognizes the value of historic and prehistoric resources and the need to assess current and proposed land uses for impacts upon these resources.

TABLE 5.11-1 CONSISTENCY WITH APPLICABLE GENERAL PLAN TRIBAL CULTURAL RESOURCES GOALS AND POLICIES

General Plan Policies	Consistency	Analysis
Conservation and Open Space Element (COSE)		
Conservation of Environmental Resources for Future Generations, COSE Goal 1: - Environmental resources shall be conserved for future generations by minimizing environmental impacts in all land use decisions and educating the public on their value	Yes, with mitigation	Cultural resources investigations have been conducted for the proposed Specific Plan and potential impacts have been minimized. The Project is in compliance with this goal through incorporation of mitigation measures (MM) CR-1 through MM CR-4.
Preservation of Cultural Resources, COSE Goal 3: - Objective 3.1: Protect and preserve sites of archaeological, ecological, historical, and scientific value, and/or cultural significance.	Yes, with mitigation	Cultural resources investigations have been conducted for the proposed Specific Plan. The proposed Specific Plan is in compliance with this goal through incorporation of MMs CR-1 through MM CR-4.
Preservation of Cultural Resources, COSE Goal 3: - Objective 3.3: Engage all local Native American Tribes in the protection of tribal cultural resources, including prehistoric trails and burial sites.	Yes	Pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) letters were distributed to 18 Native American tribes to engage and offer them of an opportunity to consult with the County on the proposed Specific Plan's potential to impact Tribal Cultural Resources, to determine whether or not Tribal Cultural Resources are present within the project area, and if so, to determine the most appropriate way to avoid or mitigate impacts. Copies of the letters are included in Appendices F-2 and F-3 of the EIR.

Source: County of Imperial, 2016.

The GSPA is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the GSPA is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County. The GSPA contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by the Bureau of Land Management (BLM). The GSPA is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California.

5.16.3 Analysis of Project Effects and Significance Determination

This section presents the significance criteria used for considering project impacts related to tribal cultural resources, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

Guidelines for Determination of Significance

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

1. 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:
    a) listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in PRC section 5020.1(k); or
    b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Impact 5.16-1: Cause a substantial adverse change in the significance of a Tribal Cultural Resource?

Pursuant to (PRC Section 21080.3.1, upon determining that an Initial Study (IS) would be prepared for the proposed Project, the County initiated a plan to conduct consultation with California Native American Tribes traditionally and culturally affiliated with the project area. In addition to the Native American contact program conducted for the cultural resources investigation, and in conformance with rules enacted under AB 52 and SB 18, the County, as CEQA lead agency for the proposed Project, initiated consultation with local Native American representatives to identify tribal cultural resources that may be affected by the proposed Specific Plan.

On February 7, 2020, the County sent notification letters to one (1) California Native American Tribe and/or their representatives initiating the 30-day period to request consultation required by AB 52. Similarly, on February 11, 2020 the County sent notification letters to twenty (20) federally-recognized California Native American Tribes and/or their representatives initiating a 90-day period to request consultation required under SB 18. Copies of the AB 52 and SB 18 notification letters are provided in Appendix F-2 and F-3, respectively.

As of the date of publication of the Draft EIR, no responses have been received and formal consultation has been closed.

However, based on knowledge of areas used by their ancestors and the stated potential to encounter resources during project excavation, the County agreed to retain the services of a full-time Native American monitor during the initial grubbing and all ground disturbing activities, as included in Mitigation Measure (MM) CR-1. With implementation of MMs CR-1 through CR-4, the proposed Specific Plan's impact on tribal cultural resources would be less than significant.

As a result of the consultation efforts, no known tribal cultural resources have been identified within the GSPA. Therefore, the implementation of the proposed Specific Plan would not result in a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), since no tribal cultural resources were identified within or immediately adjacent to the GSPA. No impacts to known tribal cultural resources would occur.

Impact 5.16-2: Substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe determined to be significant the County of Imperial?

Based on coordination to date, Native American representatives have not provided information indicating there are resources that are significant to a California Native American tribe or otherwise qualify as Tribal Cultural Resources, as defined in Public Resources Code Section 5024.1. Nevertheless, the GSPA is considered sensitive for potential buried cultural resources and/or subsurface deposits. Therefore, there is the potential for inadvertent discovery of a resource that could be impacted by project implementation. Impacts would be considered potentially significant. With implementation of Mitigation Measures **MM CR-1** through **MM CR-4**, potential impacts to buried cultural resources and/or subsurface deposits would be less than significant.

5.16.4 Mitigation Measures

Implementation of MMs CR-1 through MM CR-4 would reduce potentially significant impacts to tribal cultural resources to below a level of significance because these measures require the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented significant archaeological resources and human remains.

Level of Significance After Mitigation

Less than significant.

6.0 ANALYSIS OF LONG-TERM EFFECTS

This section of the Draft Environmental Impact Report (EIR) discusses additional topics statutorily required under the California Environmental Quality Act (CEQA): significant and unavoidable environmental impacts and growth-inducing impacts.

6.1. Growth-Inducing Impacts

CEQA Guidelines, Section 15126.2[d], requires that an EIR evaluate a proposed action's potential to cause growth-inducing impacts. The growth-inducing impacts discussion should include direct and indirect ways the Project could foster economic or population growth, the construction of additional housing, or remove obstacles to population growth. CEQA Guidelines define a "growth-inducing impact" as follows:

> *. . . the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth . . . It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.*

Direct growth-inducing impacts typically include the provision of public services, utilities, and roads to a previously undeveloped area. The introduction of infrastructure and services can result in growth inducing impacts by reducing development constraints for nearby areas, thereby inducting other landowners in the area to convert their properties to other uses. Direct growth inducing impacts can also result from growth in the surrounding population that taxes existing public services, or a particular development that increases the pace or density of surrounding developments.

CEQA Guidelines also specify that the environmental effects of induced growth are considered indirect impacts of the proposed action. The additional demand for housing, commodities and services that new development causes or attracts by increasing population in the area are examples of indirect growth-inducing impacts or secondary effects of growth.

If the growth is not consistent with or accommodated by local land use plans and growth management plans and policies for the area affected, then the growth inducement may constitute an adverse impact. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services. A project that would conflict with the local land use plans (i.e., "disorderly" growth) could indirectly cause additional adverse environmental impacts and other public services impacts. To assess whether a growth-inducing project would result in adverse secondary effects, the growth accommodated by a project must be assessed to determine if it would or would not be consistent with applicable land use plans.

The proposed specific Plan would involve the development of the Glamis Specific Plan Area (GSPA) (see Chapter 4, Project Description). The proposed Specific Plan would result in construction of some condominiums and hotel units, as well as employee housing and development of an recreational vehicle (RV) park. However, these would only be occupied seasonally. The proposed Specific Plan would result in an increase in seasonal employment from October through April.

While the proposed Specific Plan would require an amendment to Imperial County's General Plan Land Use Element to change the land use designations from the County's existing C-2 and S-1 designations to new land use designations of Commercial Recreation (CR) 1, 2 and 3 as well as the County's S-1 designation and the approval of a Conditional Use Permit (CUP) for a new well, to the proposed Specific Plan would be consistent with the General Plan since the General Plan has already designated this as a Specific Plan area.

The proposed Specific Plan would utilize existing infrastructure, such as roadways. However, it would not support the development of adjacent properties by extending infrastructure to areas not previously served. Therefore, the proposed Specific Plan would have no indirect growth inducing effects.

6.2. Mandatory Findings Of Significance

CEQA Guidelines, Section 15065, identify four mandatory findings of significance that have to be considered as part of the environmental review process. These findings are identified below with an analysis of the proposed Specific Plan's relationship to these findings.

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

Section 5.3, Biological Resources, and Section 5.4, Cultural Resources, of this Draft EIR, evaluate the proposed Specific Plan's impacts on biological resources and cultural resources. Mitigation measures (MM) in Section 5.2 and Section 5.3 are identified to reduce impacts to biological resources as well as cultural and paleontological resources. When the MMs identified in these sections are implemented, impacts to the quality of the environment, habitat of fish and wildlife species, fish and wildlife species populations, plant and animal communities, the number and range of protected species, and cultural resources would be less than significant.

2. Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

The proposed Specific Plan would not result in the achievement of short-term environmental goals to the disadvantage of long-term environmental goals. This Draft EIR includes analysis of the potential short-term (construction phase) and long-term (operation phase) impacts that could occur as a result of implementation of the proposed Specific Plan. The analysis contained in Sections 5.1 through 5.12 is based on existing environmental setting conditions, policy and regulatory conditions, proposed Specific Plans characteristics, and, where applicable, proposed Specific Plan -specific technical studies detailing both long- and short-term potential impacts. The proposed Specific Plan would:

- be required to implement mitigation measures to reduce impacts to less than significant levels;
- be required to comply with all applicable regulatory requirements; and
- would require a CUP and other entitlements for approval.

Implementation of the proposed Specific Plan would not preclude the state from meeting its long-term environmental goals. Rather, since the proposed Specific Plan could result in the development of solar or wind energy generation facilities, it would assist the state in meeting its long-term environmental goals for achieving greenhouse gas reductions in compliance with Assembly Bill (AB) 32. It would also support California's renewable performance standard (RPS) goal of 33 percent renewable energy delivery by 2020, 60 percent by 2030 and 100 percent by 2040.

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

Chapter 7 of this Draft EIR evaluates the proposed Specific Plan's potential cumulative impacts. Cumulative impacts related to each technical discussion area are evaluated. No cumulatively considerable impacts were identified.

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

Potential human-related impacts are discussed and evaluated in Section 5.14 Transportation/Traffic. This section identifies mitigation measures, where needed, to reduce significant impacts associated with these resource areas. Direct and indirect project impacts to human beings are anticipated to be less than significant upon implementation of the mitigation measures identified in these sections. The proposed Specific Plan would comply with all required regulatory/legal requirements and mitigation measures.

6.3. Significant Irreversible Environmental Changes

CEQA Guidelines, Section 15126(c), requires an EIR to discuss any irreversible changes to the environment possibly resulting from the implementation of the proposed Specific Plan. Irreversible commitments of several limited resources would result from the proposed Specific Plan. Such resources include, but are not limited to: lumber, sand, gravel, concrete, asphalt, petrochemical construction materials, steel, copper, lead and other metals, and water consumption during construction and operation of the proposed Specific Plan.

During project operations, oil, gas, and other nonrenewable resources would be consumed. Therefore, an irreversible commitment of some nonrenewable resources would occur as a result of long-term project operations. However, the proposed Specific Plan would support the continued operation of renewable energy resources (wind and solar energy) in the County. The proposed Specific Plan facilities the continued implementation of state goals and policies directed at moving away from reliance upon fossil fuels, and encouraging renewable energy. With implementation of MMs identified in in Section 5.0 of this Draft EIR, no significant irreversible environmental changes would result.

6.4. Significant and Unavoidable Environmental Effects

CEQA Guidelines, Section 15126.2(b), requires an EIR to address any unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. Section 15093(a) of CEQA Guidelines allows the decision-making agency to determine if the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. A Statement of Overriding Considerations can be prepared by the County of Imperial to approve a project with unavoidable adverse impacts if it sets forth the specific reasons for making such a judgment.

The impact analysis, as detailed in Section 5.0 of this Draft EIR, concludes that no unavoidable significant impacts were identified. Where significant impacts have been identified, mitigation measures are proposed, that when implemented, would reduce the impact level to less than significant. Thus, the proposed Specific Plan would not result in any significant and unavoidable adverse impacts.

7.0. Cumulative Impacts

The California Environmental Quality Act (CEQA) Guidelines (Section 15355) define a cumulative impact as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The CEQA Guidelines [Section 15130(a)(1)] further states that "an EIR should not discuss impacts which do not result in part from the project."

Section 15130(a) of the CEQA Guidelines provides that "[A]n EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable..." Cumulatively considerable, as defined in Section 15065(a)(3), "means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

An adequate discussion of significant cumulative impacts requires either: (1) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or (2) "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact."

The CEQA Guidelines recognize that cumulative impacts may require mitigation, such as new rules and regulations that go beyond project-by-project measures. An environmental impact report (EIR) may also determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The Lead Agency must identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable (CEQA Guidelines Section 15130(a)(3)).

This Draft EIR evaluates the cumulative impacts of the project for each resource area, using the following steps:

(1) Define the geographic and temporal scope of cumulative impact analysis for each cumulative effects issue, based on the project's reasonably foreseeable direct and indirect effects.

(2) Evaluate the cumulative effects of the project in combination with past and present (existing) and reasonably foreseeable future projects and, in the larger context of the Imperial Valley.

(3) Evaluate the project's incremental contribution to the cumulative effects on each resource

considered in Chapter 4, Environmental Analysis. When the project's incremental contribution to a significant cumulative impact is considerable, mitigation measures to reduce the project's "fair share" contribution to the cumulative effect are discussed, where required.

7.1. Geographic Scope and Timeframe of the Cumulative Effects Analysis

The geographic area of cumulative effects varies by each resource area considered in Chapter 4. For example, air quality impacts tend to disperse over a large area, while traffic impacts are typically more localized. Similarly, impacts on the habitats of special-status wildlife species need to be considered within its range of movement and associated habitat needs. The analysis of cumulative effects in this Draft EIR considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of each analysis is based on the topography surrounding the project sites and the natural boundaries of the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative effects will often extend beyond the scope of the direct effects of a project, but not beyond the scope of the direct and indirect effects of that project.

The cumulative development scenario includes projects that extend through year (2030), which is the planning horizon of the County of Imperial General Plan. Because of uncertain development patterns that are far in the future, it is too speculative to accurately determine the type and quantity of cumulative projects beyond the planning horizon of the County's adopted County General Plan.

The geographic area that could be affected by development of the Glamis Specific Plan Area varies depending on the type of environmental resource being considered. The general geographic area associated with various environmental effects of construction and operation of the proposed Project defines the boundaries of the area used for compiling the list of projects considered in the cumulative impact analysis. Table 7-1 presents the general geographic areas associated with the different resources addressed in this EIR and evaluated in those sections of this cumulative analysis.

TABLE 7-1. GEOGRAPHIC SCOPE OF CUMULATIVE IMPACTS

Resource Issue	Geographic Area
Aesthetics	• Local (immediate project vicinity—effects are highly localized)
Air Quality	• Regional (Salton Sea Air Basin for pollutant emissions that have regional effects • Local (immediate project vicinity—pollutant emissions that are highly localized)
Biological Resources	• Regional (Imperial County)
Cultural Resources	• Regional (Imperial County)
Energy	• Regional (Imperial County)
Geology & Soils	• Local (immediate project vicinity)
Greenhouse Gas Emissions	• Global

TABLE 7-1. GEOGRAPHIC SCOPE OF CUMULATIVE IMPACTS

Resource Issue	Geographic Area
Hazards and Hazardous Materials	• Local (immediate project vicinity)
Hydrology and Water Quality Local	• Local (immediate project vicinity—local watershed)
Land Use and Planning	• Local (immediate project vicinity) and Regional (Imperial County)
Noise	• Local (immediate project vicinity—effects are highly localized)
Population and Housing	• Local (immediate project vicinity) and Regional (Imperial County)
Public Services	• Regional (regional service areas)
Transportation/Traffic	• Regional and local (discussed in Section 5.14, "Transportation/Traffic")
Tribal Cultural Resources	• Regional (Imperial County)
Utilities/Service Systems	• Regional (regional service areas)

Source: McIntyre Environmental, LLC, 2021.

7.2. Projects Contributing to Potential Cumulative Impacts

The CEQA Guidelines identify two basic methods for establishing the cumulative environment in which the projects are to be considered: the use of a list of past, present, and probable future projects (the "list approach") or the use of adopted projections from a general plan, other regional planning document, or certified EIR for such a planning document (the "plan approach").

For this Draft EIR, the list approach has been utilized to generate the most reliable future projections of possible cumulative impacts. When the impacts of the project are considered in combination with other past, present, and future projects to identify cumulative impacts, the other projects considered may also vary depending on the type of environmental impacts being assessed. As described above, the general geographic area associated with different environmental impacts of the project defines the boundaries of the area used for compiling the list of projects considered in the cumulative impact analysis. Figure 7-1 provides the general location for each of these projects in relation to the Planning area.

7.3. Cumulative Impact Analysis

This cumulative impact analysis utilizes an expanded list method (as defined under CEQA) and considers environmental effects associated with those projects identified in Table 7-2 in conjunction with the impacts identified for the project in Chapter 4 of this Draft EIR. Table 7-2 includes projects known at the time of release of the Notice of Preparation (NOP) of the Draft EIR, as well as additional projects that have been proposed since the NOP date. Figure 7-1 provides the general geographic location for each of these projects.

7.3.1. Aesthetics

The Cumulative Effects Study Area (CESA) for the analysis of cumulative impacts related to aesthetics is generally limited to the Glamis Specific Plan Area (GSPA) and the surrounding viewshed. This extent is appropriate because visual impacts are generally localized.

With the exception of the State Route 78 (SR-78) off highway vehicle (OHV) overpass, there are no other potential cumulative projects within the viewshed of the GSPA. The development of the GSPA would not result in significant changes to the existing visual quality or character of the site.

The only foreseeable project near enough to the GSPA to be included in the cumulative analysis is the SR-78 OHV overpass (i.e., in the vicinity of the GSPA). Given the nature of this foreseeable project, visual effects from this cumulative project and proposed Specific Plan would not likely combine to a significant visual impact. Thus, the noise levels in the area would be less than cumulatively considerable.

7.3.2. Air Quality

The CESA for comprehensive air quality analysis includes the entire Imperial Valley under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). Although a single project would rarely cause a violation of a federal or state criteria pollutant standard, a new source of pollution may contribute to violations of criteria pollutant standards due to existing background sources or foreseeable future projects.

The proposed Specific Plan's contribution to cumulative air quality impacts would be different during construction and operations. Development within the GSPA is intended to occur over a span of approximately 20 to 50 years and will depend on market conditions, availability of supporting infrastructure, and other factors. Four (4) phases of development are proposed which provide a summarized development scheme and offer a general guideline on construction sequencing. Construction emissions over the duration of the life of the proposed Specific Plan are assumed to be higher immediately after Plan adoption because regulatory requirements on construction equipment is continuously evolving to require the use of cleaner technologies. Given this, a worst-case construction scenario of three (3) years was assumed. All existing and foreseeable projects in Table 7-2 may contribute to cumulative effects for air quality.

The Imperial Valley portion of the Salton Sea air basin is currently designated as being in nonattainment for Ozone (O_3) and particulate matter (PM_{10}) under both the National and California Ambient Air Quality Standards. During both construction and operations, the proposed Project would emit PM_{10} and Nitrous Oxide (NO_x) (an ozone precursor).

As discussed in Section 5.2 of the Draft EIR (Air Quality Impact 5.2-1) implementation of the proposed Specific Plan would temporarily increase air pollutant emissions during construction of the individual implementation activities. However, the proposed Specific Plan is consistent with

ICAPCD plans and would not exceed pollutant thresholds during operation. The proposed Specific Plan's potential to result in a cumulatively considerable net increase of any criteria pollutant is considered less than significant with mitigation incorporated. With implementation of Mitigation Measures (MMs) AQ-1 and AQ-2 impacts would be less than significant. Impacts from the proposed Specific Plan would be reduced through the implementation of mitigation measures consisting of standard construction and operation measures required by the ICAPCD; therefore, the proposed Specific Plan would not make a cumulatively considerable incremental contribution to an existing significant cumulative air quality impact.

7.3.3. Biological Resources

Generally, the CESA for biological resources includes the entirety of the Imperial Valley. This extent (the entire Imperial Valley region) makes it possible to account for impacts to biological resources that may have restricted migration to and from adjacent physiographic regions due to habitat changes from region to region. The duration of time that the projects would contribute to cumulative effects would be approximately 20 to 50 years, which reflects the projected development within the GSPA.

All existing and foreseeable future projects in Table 7-2 may contribute to cumulative effects for biological and natural resources.

In conjunction with other development projects in the project vicinity (Table 7-2), implementation of the proposed Specific Plan would not have a cumulative considerable impact on biological resources. With the implementation of mitigation measures, the proposed Specific Plan would be consistent with applicable policies of the Flat-tail horned lizard Management Strategy. In addition, impacts to the unvegetated, non-wetland, ephemeral waters (on-site) and would be fully mitigated and no-net-loss of wetlands would occur. Lastly, potential impacts to burrowing owl, Colorado fringe toed lizard, Gila woodpecker, Le Conte's thrasher and loggerhead shrike would be avoided with implementation of MM BIO-1 through MM BIO-5. For above reasons, the proposed Specific Plan's impacts on biological resources would be reduced to less than cumulatively considerable with mitigation.

7.3.4. Cultural and Tribal Resources

The CESA for cultural and paleontological resources consists of the Imperial Valley, including the southern portion of Riverside County. This geographic scope is appropriate because it is likely that cultural resources similar to those in the project area are present throughout the Imperial Valley, and that ground disturbance required for existing, approved, and reasonably foreseeable projects would likely have impacted or would impact similar resources. The occurrence of the impact would be primarily during construction of the proposed Specific Plan or any of the foreseeable projects, but impacts would be permanent. All foreseeable projects on Table 7-2 may contribute

to cumulative effects for cultural and tribal resources, because all are likely to involve ground-disturbing activities to some extent during construction.

The proposed Specific Plan, in combination with existing, approved, proposed, and other reasonably foreseeable projects in the CESA, could result in impacts to prehistoric resources, historic resources, paleontological resources, and human remains.

Construction of multiple projects in the region could result in the loss and/or degradation of cultural or tribal cultural resources regionally and could also result in the disturbance of human remains. Without proper mitigation, the cumulative effects of these types of large-scale development projects on cultural resources could be significant.

While the historical resources that meet the criteria for listing on the California Register of Historic Resources (CRHR) identified in the GSPA vicinity would be avoided by the proposed Specific Plan, it is possible that subsurface resources are present that have not yet been identified. Although unlikely, ground-disturbing activities related to the proposed Specific Plan could uncover previously unknown prehistoric, historic, as well as paleontological resources within GSPA boundaries. Therefore, the proposed Specific Plan have the potential to incrementally contribute to the disturbance of previously unknown cultural and paleontological resources.

The proposed Specific Plan will be required to implement mitigation measures MM CUL-1.1 through MM CUL 1.4; MM CUL-3.1; and MM CUL-4.1 to reduce potential impacts to archaeological, historical and paleontological resources during construction of the proposed Specific Plan to below a level of significance. Existing, approved, proposed, and other reasonably foreseeable projects with potentially significant impacts to archaeological, historical and tribal cultural resources would be required to comply with federal, state, and local regulations and ordinances protecting cultural resources through implementation of similar mitigation measures during construction. Therefore, with implementation of regulatory requirements and standard conditions of approval, and MMs CUL-1. through MM CUL 4; (Section 5.4), the proposed Specific Plan's contribution to impacts to cultural and tribal cultural resources would not be cumulatively considerable.

7.3.5. Energy

The CESA for energy is the service area for both the Imperial Irrigation District (IID), which supplies water and power to most users in the Imperial Valley, and Southern California Gas Company, which provides natural gas service to the area.

There are sixteen solar projects and one transmission line project that occur within the CESA. All of these projects would have a beneficial impact to energy resources in that they would result in the generation and transmission of energy for the region's power grid. The proposed Specific Plan would result in the phase out of existing diesel generators once the project has been connected to

a constant electricity source. Upgrades to the electrical system could include construction and installation of a power line (transmission line and/or distribution line) by Imperial Irrigation District (IID) to extend power from the nearest substation (approximately 7.2 miles to the northeast). A second and potentially more viable option would be to develop a small commercial solar photovoltaic (PV) system, with a backup battery storage component or another green power system. Retirement of the diesel generators and the use of renewable energy resources would have beneficial impacts. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would occur. Thus, the proposed Specific Plan, when considered in combination with other past, present, and reasonably foreseeable projects within the vicinity, would result in significant beneficial cumulative impacts.

7.3.6. Geology and Soils

The CESA for geology, soils, is confined to the GSPA. This is because geologic materials, and soils occur at specific locales and are generally unaffected by activities not acting on them directly or immediately adjacent to them, and any impacts of the proposed Specific Plan would be site-specific. The time component of potential impacts would be the 20 to 50 years within which projected development would occur within the GSPA.

The SR-78 OHV overpass would be the only other project that could contribute to cumulative impacts on this resource at this location.

The proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact to geology and soils.

Soils associated with the GSPA are similar to other soils in the area. Site-specific conditions result in impacts associated with fault rupture and strong seismic ground shaking, seismic-related ground failure, including liquefaction and unstable soils, landslides, and shallow groundwater. These inherent conditions are the result of natural historical events that occur through vast periods of geologic time and are not based on cumulative development.

The proposed Specific Plan will require grading of portions of the GSPA to allow for development of the different phases. It is expected that the proposed Specific Plan and other area development will comply with the International Building Code (IBC) and the California Building Code (CBC). Thus, the proposed Specific Plan, when considered in combination with other past, present, and reasonably foreseeable projects within the vicinity, would not result in significant cumulative impacts. Accordingly, the proposed Specific Plan's contribution to a significant cumulative geology and soils impact is less than cumulatively considerable.

7.3.7. Greenhouse Gas Emissions

In considering greenhouse gas impacts, it is necessary to consider both anthropogenic and natural sources. For the proposed Specific Plan the CESA is the Imperial County portion of the Salton Sea

Air Basin (SSAB). In confining the analysis to this extent, it is possible to accurately calculate cumulative emissions and track the region's contribution to climate change. The duration of impacts would be the lifetime of the project, but there would be different potential impacts during construction and operations.

All existing and foreseeable projects listed in Table 7-2 may have a cumulative effect on climate change. The climate change analysis conducted in the Greenhouse Gas (GHG) Emission section is equivalent to a cumulative analysis. Please see Section 5.7 of this Draft EIR.

7.3.8. Hazards and Hazardous Materials

For the purposes of this cumulative analysis, risk from the transport, use, and disposal of hazardous materials during construction would be limited to areas where concurrent construction or operations are occurring in very close proximity to each other. Therefore, the only project that may contribute to cumulative hazards and effects on public safety as a result of the transport, use, and disposal of hazardous materials are those that would occupy the same site which is the SR-78 OHV overpass.

Existing, approved, proposed and reasonably foreseeable projects in the CESA would not create a significantly cumulative hazard to the public through the routine transport, use, or disposal of hazardous materials.

A significant cumulative hazardous materials impact occurs if there is simultaneous uncontrolled release of hazardous materials from multiple locations in a form (gas or liquid) that could cause a significant impact where the release of one hazardous material alone would not cause a significant impact. For a significant impact of this nature to occur, the releases have to occur in a centralized location.

It is unlikely for an event such as this to occur during construction of the proposed specific Plan because spills and releases tend be localized and would be smaller than one that could occur during operations because they would only the volume of a container used at any one time. In addition, they would be addressed immediately per a storm water pollution prevention plan (SWPPP) or Hazardous Material Business Plan.

During operations, a potential cumulative significant event could occur if an upset event at a nearby development had a cascading effect that caused an upset at the GSPA. While this is theoretically possible, it is not very probable. The proposed Specific Plan will have its own fire suppression systems and Hazardous Materials Business Plan.

Other projects listed in Table 7-2 would be or have been subject to similar project-specific or legally required control and mitigation measures and therefore there is no substantial evidence of a significant cumulative effect relating to hazards and public safety from the transport, use, and disposal of hazardous materials.

Existing, approved, proposed and reasonably foreseeable projects in the CESA would not result in a significant cumulative impact associated with interference with an Emergency Response Plan. Cumulative impacts that would cause an interference with Emergency Response Plans would include infrastructure additions, such as adding a new railway crossing, road closures, road segment removal, or other such modifications. There is no substantial evidence indicating there is significant cumulative impact relating to the hindrance of emergency responses. Moreover, the proposed Project does not include any improvements that would physically interfere with an adopted emergency response plan or emergency evacuation plan.

7.3.9. Hydrology and Water Quality

The CESA for hydrology and water quality is the Amos Valley Groundwater Basin (Basin Number 7-34), as defined by the California's Groundwater, Bulletin 118 – Update 2003, Ocotillo-Clark Valley Groundwater Basin (2004). The basin is bounded by nonwater-bearing rocks of the Chocolate Mountains on the north and northeast and by the San Andreas fault zone on the south and southeast. Low-lying alluvial drainage divides define the eastern and western boundaries. Projects that may contribute to cumulative effects for hydrology and water quality include the SR-78 OHV Highway Overpass.

The proposed Specific Plan would not make a cumulatively considerable contribution to a significant cumulative impact to hydrology and water quality.

Existing, approved and reasonably foreseeable projects would have to comply with SWPPPs during construction to ensure they would not violate any water quality standards or waste discharge requirements. Such projects would also have to comply with their respective National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permits, which require that water quality control measures be incorporated into project design to reduce discharges of site runoff over the life of the project. Large scale foreseeable projects would also have to include stormwater retention basins. During operations, the proposed Specific Plan will comply with and obtain coverage under the General Industrial Stormwater Permit which will require preparation of an Industrial SWPPP (I-SWPPP). The I-SWPPP will identify appropriate best management practices (BMPs) to prevent erosion and the mobilization of pollutants in stormwater runoff, define primary and alternative sampling locations, and describe monitoring and maintenance that will be implemented over the life of the proposed Specific Plan. As a result, the proposed Specific Plan's contribution to water quality impacts would not be cumulatively considerable.

7.3.10. Land Use and Planning

The CESA for the analysis of cumulative impacts related to land use compatibility is the rural agricultural areas on the west side of the Salton Sea within the County of Imperial's jurisdiction. Cumulative impacts could result from the physical division of an established community or from conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding

or mitigating environmental impacts. As there would be no communities divided by the proposed Specific Plan, nor would there be a conflict with a land use plan, policy, or regulation, there is no cumulative impact.

7.3.11. Noise

The CESA for the analysis of cumulative impacts related to noise is generally limited to areas within approximately one mile of the GSPA. This extent is appropriate because noise impacts are generally localized; however, it is possible that noise from different sources could combine to create a significant impact to receptors at any point between the projects, as well as along the common roadways utilized by the projects. At distances greater than one mile, impulse noise may be briefly audible and steady construction and/or operational noise would generally dissipate such that the level of noise would reduce to below County of Imperial noise limits and blend in with background noise levels.

With the exception of the SR-78 OHV overpass, there are no potential cumulative projects within one-mile of the GSPA. The development of the proposed Specific Plan would increase ambient noise or ground-borne vibration.

Cumulatively considerable noise impacts would occur during construction or operations if noise levels at sensitive receptors exceed 70 dBa at a receptor boundary. Noise effects are not additive because noise attenuates over distance, as does ground-borne vibration; therefore, only noise or vibration generated in close proximity could contribute to the noise heard or vibration felt at a receptor.

The only foreseeable project near enough to the GSPA to be included in the cumulative analysis is the SR-78 OHV overpass (i.e., at the proposed GSPA). There is potential for noise to be cumulatively considerable from Glamis and SR-78 if the construction period for the two projects overlaps. However, impacts from construction noise would be temporary. Given the existing noise level from OHVs already in the area, the nature of this foreseeable project, its distance from the NADW, and the County's noise restrictions, noise from this cumulative project and proposed Specific Plan would not likely combine to create noise levels above 70 dBA or perceptible ground-borne vibration during construction or operations at these receptors. Thus, the noise levels in the CESA would be less than cumulatively considerable.

7.3.12. Transportation

The CESA for cumulative effects on transportation and circulation includes the local roadway network considered for analysis of the proposed Specific Plan's direct impacts including SR-78, Ted Kipf Road and Wash Road.

The proposed Specific Plan would not make a cumulatively considerable contribution to a significant cumulative traffic impact on future (2040) operations.

During construction and operations, the proposed Specific Plan would add 54 and 150 daily trips to the regional transportation system, respectively. According to the traffic impact study developed by LLG, all affected road segments, key intersections, and affected highways would operate at acceptable levels of service during construction and operation of the proposed Specific Plan. The proposed Specific Plan would not contribute to a cumulatively significant impact during construction.

7.3.13. Utilities and Service Systems

Impacts to utilities and service systems can occur if new facilities need water or power or generate wastewater requiring treatment that exceeds the existing or planned capacity of the local service providers. Service providers serving the GSPA are located in Imperial County; therefore, the CESA for cumulative impacts to utilities and services is limited to Imperial County. The duration of impacts would be the lifetime of the projects, but there would be different potential impacts during construction and operations.

All existing and foreseeable projects in Table 7-1 may contribute to cumulative effects for electricity, but only those projects that require water from Amos Valley groundwater basin would contribute cumulative impacts to water supplies.

The proposed Specific Plan would not make a cumulatively considerable contribution to a significant cumulative impact to utilities and services.

Development of the GSPA would not require the construction or expansion of municipal water, wastewater treatment, or stormwater drainage facilities. The proposed Specific Plan would not exceed capacity of local landfills.

Development of the GSPA would require up to 22.59 AF of water during construction for dust control and up to 12.07 AFY during operations, which would be obtained via groundwater from the Colorado River groundwater basin. Concurrent construction/operation of the other foreseeable projects within the basin and outside of IID’s water service area may also meet their water requirements with groundwater.

The water supply assessment (WSA) prepared for the proposed Specific Plan took these projects into consideration when it determined that there is sufficient water available during both normal and single dry years.

Because there are sufficient existing supplies to serve the anticipated need of projects within the groundwater basin into the future, the proposed Specific Plan’s incremental demand for water would not be cumulatively considerable.

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
EXISTING PROJECTS					
1.	Calexico I-A [(d) (u)]	8 Minute Energy	100 MW PV solar facility and supporting structures on approximately 666 acres.	Under Construction	38.0 miles southwest
2.	Calexico I-B [(d) (u)]	8 Minute Energy	100 MW PV solar facility and supporting structures on approximately 666 acres.	Under Construction	39.5 miles southwest
3.	Cluster I Solar (Calipatria, Wilkinson, Lindsey, Midway I, Midway II, Midway III, Midway IV) [(k) (u)]	8 Minute Energy	Three (3) PV solar farms generating up to 255 MW on approximately 1,731 acres.	Portions are Operational, Portions are Approved – Not Built, and Portions are Under Construction	28.3 miles northwest
4.	Campo Verde Solar Project and Battery Storage System[(c) (j) (u)]	Southern Power Company	The solar component consists of a 140 MW PV solar facility and supporting structures on approximately 1,990 acres. The Battery Storage component consists of a utility-scale battery energy storage facility capable of storing up to 105 MWH of energy within the footprint of the existing solar Project.	Operational	39.7 miles southwest
5.	Centinela Solar [(b) (u)]	Centinela Solar Energy, LLC	A 275 MW PV solar facility and supporting structures on approximately 2,067 acres.	Portions are Operational, Portion Approved – Not Built	38.6 miles southwest
6.	Citizens Imperial Solar Project [(m)(u)]	Citizens Imperial Solar, LLC	A 30 MW PV solar facility and supporting structures on approximately 223 acres.	Operational	24.3 miles northwest
7.	Iris Cluster Solar Farm (Ferrel, Rockwood, Iris and Lyons) [(g) (u)]	8 Minute Energy	Four (4) separate solar farms and supporting structures on 1,400 acres.	Portions are Under Construction Portions Approved – Not Built	36.0 miles southwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
8.	Wistaria Ranch Solar Project (f) (u)	Wistaria Ranch Solar, LLC	A 250 MW PV or CPV solar facility and supporting structures on approximately 2,793 acres.	Portions Are Under Construction Portions are Approved – Not Built	36.3 miles southwest
9.	Seville Solar Farm Complex (I, II, III, 4 and 5) (e) (u)	Imp. Solar Holding, LLC	Five (5) PV solar projects generating 135 MW on approximately 1,238 acres.	Portions Are Operational, Portions Are Approved – Not Built	53.9 miles northwest
10.	Valencia Solar Project 2 (h) (u)	IGS, LLC	3MW PV solar facility and associated structures on a portion of a 17-acre property.	Under Construction	25.8 miles southwest
11.	Valencia Solar Project 3 (i) (u)	IGS, LLC	3MW PV generation facility on a portion of a of a 40-acre property.	Under Construction	27.9 miles southwest
PROBABLE FUTURE PROJECTS					
12.	Desert Valley Company Monofill - Cell 3 Closure (uu)	CalEnergy	Installation of Cell 3 Final Cover; continued leachate monitoring and collection; continued sampling of groundwater monitoring wells; installation and monitoring of vents for radon gas as mandated by ICAPCD; inspections of the final cover, dikes, drainage systems, leachate system, leak detection, access road, landfill structures and site security; and implementation of corrective actions, as necessary.	Anticipated to Commence 2025	43.4 miles northwest
13.	Desert Valley Company Monofill Expansion Project (Cell 4) (v)	CalEnergy	Expansion of the existing DVC Monofill with the addition of waste storage Cell 4 and a new leachate pond, addition and extension of storm-water diversion dikes, minor extension/modification to internal roads, installation of a new water well and additional air quality particulate sampling stations and groundwater monitoring wells.	EIR in Progress	43.7 miles northwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
14.	Chocolate Mountain Solar Farm [(u)]	8 Minute Energy	50 MW PV solar facility and supporting structures on approximately 320 acres.	Approved	36.1 miles northwest
15.	Drew Solar, LLC [(s)(u)]	Drew Solar, LLC	100 MW PV solar facility and supporting structures on approximately 808 acres.	Approved	40.0 miles southwest
16.	Laurel Cluster (Formerly Big Rock Cluster) [(n) (u)]	8 Minute Energy	325 MW PV solar facility and supporting structures on approximately 1,380 acres.	Approved	41.1 miles southwest
17.	Le Conte Energy Storage System [(t)(u)]	Centinela Solar Energy, LLC	Battery energy storage system with up to 125 MW of electric storage capacity.	Approved – Pending Litigation	40.4 miles southwest
18.	Nider Solar Project [(u)]	8 Minute Energy	100 MW PV solar facility and supporting structures on approximately 320 acres	Pending Entitlement (on hold)	25.0 miles northwest
19.	Vega SES Solar Project [(r)(u)]	Vega SES, LLC	100 MW PV solar energy facility, supporting structures, and 100 MW battery storage system on approximately 574 acres.	Pending Entitlement	39.5 miles southwest
20.	Titan Solar II/ Seville 4 [(o)]	Titan Solar II, LLC	A 20 MW PV solar facility on approximately 175 acres.	Under Construction	52.4 miles northwest
21.	Ormat Wister Solar [(w)]	Orni 22 LLC/Ormat	A 20 MW PV solar facility on 100 acres.	Approved Not Constructed	30.5 miles northwest
22.	CED Westside Canal Battery Storage [(qq)]	CED Westside Canal, LLC	Battery energy storage system with up to 2,025 MW of electric storage capacity.	Pending Entitlement	41.3 miles southwest
23.	Coyne Ranch Specific Plan [(pp)]	Marty Coyne	A residential project with up to 546 residential units.	In process	37.5 miles southwest
24.	Desert Highway Farms [(p)]	Solana Energy Farms 1, LLC	Cannabis cultivation on approximately 320 acres.	Approved, Not Constructed	54.6 miles northwest
25.	Hell's Kitchen Geothermal Exploration Project [(l)]	Controlled Thermal Resources	Construction, operations and testing of geothermal exploration wells.	Approved, Pending Entitlements	34.3 miles northwest
26.	SR 78 / Glamis Multiuse Grade Separated Crossing Feasibility Study [(mm)]	Imperial County Transportation Commission (ICTC)	Feasibility study to analyze and develop feasible alternatives for providing a safe Multiuse Grade Separated Crossing for off-highway vehicle users across the Union	Final Feasibility Study Published January 2021	Adjacent to Specific Plan Area

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
			Pacific Railroad (UPRR) rail line at the Imperial Sand Dunes Recreation Area.		
27.	El Toro Cattle [(kk)]	ETX, LLC	An expansion of the Cattle Feed Yard Operation at the existing Heber facility and requested a modification to the existing "Agreement for Zone Change #06-0011" in order to increase the feeding capacity (approximately 17,000 head of cattle) of the existing pens on two assessor parcel numbers.	In Progress	31.9 miles southwest
28.	Lack Road Bridge Replacement [(ff)]	Imperial County Public Works Dept.	Replacement of Lack Road Bridge with new precast concrete bridge.	In Progress	33.4 miles northwest
29.	Heber 2 Geothermal [(dd)]	Second Imperial Geothermal	Install two new water-cooled ORMAT Energy Converters to replace six old units; install three 10,000-gallon isopentane above ground storage tanks; and, additional pipes to connect the proposed facilities with the existing Heber 2 Geothermal Energy Complex.	In Progress	32.9 miles southwest
30.	Parcel Map #02484 [(gg)]	Susan K. Casey	Subdivide an approximately 80-acre parcel into two lots, one being 2.87 acres and the other being 77.13 acres approximately, to separate the existing houses from farmland.	In Progress	16.3 miles northwest
31.	English Road Bridge Pipe Crossing Replacement Project [(x)]	Imperial County Public Works	Improvements to the existing bridge located at English Road and Pound Road, which is located between two parcels.	In Progress	31.0 miles northwest
32.	Valencia Solar Project #3 Conditional Use Permit [(ll)]	Valencia 3 Solar	A Conditional Use Permit (CUP) amending the previously approved CUP for the Valencia 3 Solar Project and proposing to construct a gen-tie transmission line west along the south side of Harris Road for approximately 1 mile and interconnect to an IID 12.5kV line.	In Progress	27.9 miles southwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
33.	Conditional Use Permit #20-0002 (cc)	Fondomonte California, LLC	Replacement of existing CUP #16-0017 to increase the number of employees to 100, and the total trucks hauling hay in to 100 trucks/day and away to the rail with 60 trucks/day. The total tonnage stored on site is proposed to increase annually to 110,000 tons.	In Progress	25.4 miles northwest
34.	Conditional Use Permit #20-0011 (zz)	Ian Dibelka	The project applicant is requesting CUP #19-0033 for residential water well at 132 West Highway 98, Ocotillo, CA	In Progress	56.9 miles southwest
35.	Mitchell's Camp Family Association - Water Well (aa)	Mitchell's Camp Family Association	New water well for Mitchell's Camp for 14 acre-feet of water annually allotted by the City of Needles.	In Progress	29.4 miles northeast
36.	Conditional Use Permit #20-0001 (y)	Agess, Inc.	Development of a three (3) phased new cannabis Industrial Facility for on-site cultivation, harvesting, curing, packaging and sale.	In Progress	55.6 miles northwest
37.	General Plan Amendment #19-0002, Zone Change #19-0003 and Conditional Use Permit #19-0013 for West Wind Parking Storage, Inc. (ii)	West Wind Parking Storage, Inc.	A General Plan Amendment to allow for the expansion of the Heber Specific Plan Area on the General Plan Land Use Map to incorporate the existing industrial uses east of Hwy 111 and south of Heber Road as well as the proposed parcel abutting the existing industrial use fronting Heber Road. A Zone Change and a zone map correction. The zone change is to convert the existing A-2 parcel to an M-1 zone to allow for the expansion of the existing truck parking facility and the zone correction would be to take the existing two established industrial areas and convert to an M-1 zone. A Conditional Use Permit is proposed for the expansion of the existing industrial use.	In Progress	30.4 miles southwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
38.	Conditional Use Permit #19-0024 (jj)	Winterhaven Drive, LLC	Medicinal and recreational cannabis dispensary with delivery services.	In Progress	31.3 miles southeast
39.	Parcel Map #02486 and Variance V#20-0001 (hh)	Tyler and Jennifer Sutter	Parcel Map g to re-subdivide nine parcels into two parcels. No physical development is being proposed.	In Progress	42.5 miles southwest
40.	Title 9 Land Use Ordinance Revisions to Division 4, 5, 8, 10, 12, 14 and 16 (ee)	Imperial County Planning and Development Services Department	ICPDS updated Title 9 Land Use Ordinance Divisions 4, 5, 8, 10, 12, 14 & 16, in a continuing effort to be consistent with recent changes in State Law. Most changes involved modifications to building requirements to lessen burdens for obtaining building permits and making minor modifications on said Divisions to make them internally consistent.	Board Approved December 15, 2020	County-wide No specific location
41.	Conditional Use Permit #20-0009, 20-00010, 20-0011, and 20-0012 (bb)	Gordons Well II, LLC	Conditional Use Permit to increase in the current permitted water allocation and approval for a new well for a total allocation of 1,000 acre feet of water yearly.	In Progress	20.3 miles southeast
42.	County of Imperial Housing Element Update (2021-2029)	Imperial County Planning & Development Services Department	The County proposes to update its existing Housing Element of the General Plan to reflect current conditions, County policies and methods to meeting housing requirements mandated by the State.	In Progress. State Certification anticipated October 2021	NA Applicable Countywide.
43.	VEGA SES 2, 3, & 5 Solar Energy Project (CUP 20-0021, -0022, -0023) (vv)	Apex Energy Solutions, LLC	Apex Energy Solutions, LLC, proposes to construct and operate a 350 MW PV solar energy facility with an integrated 350 MW battery storage system and infrastructure on 1,963 acres of privately-owned land in the unincorporated area of Imperial County, CA.	In Progress	23.0 miles northwest
44.	VEGA SES 4 Solar Energy Project (CUP 20-0020) (ww)	Apex Energy Solutions, LLC	Apex Energy Solutions, LLC, proposes to construct and operate a 100 MW PV solar energy facility with an integrated 100 MW battery storage system and infrastructure on	In Progress	24.2 miles southwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
			531 acres of privately-owned land in the unincorporated area of Imperial County, CA.		
IMPERIAL IRRIGATION DISTRICT					
45.	Strategic Transmission Expansion Plan [(nn)]	Imperial Irrigation District	A multiregional strategic transmission expansion Plan which includes: • A new double circuit 230 kV collector system, connecting six substations; • Two (2) new substations; • A new 1 500-kV AC line to connect Arizona Public Service's North Gila substation to IID's Highline substation; and, • A new 500 kV DC transmission line from the Salton Sea area to the San Onofre Nuclear Generating Station substation.	Plan Approved	Nearest segment of transmission alignment 12.8 miles southwest Nearest substation 19.3 miles southwest
46.	Red Hill Bay Wetland Restoration Project [(oo)]	IID and USFWS Sonny Bono Salton Sea National Wildlife Refuge	Construction of 621 acres of shallow saline ponds for shallow shorebird and wading bird habitat.	Approved. Notice of Determination filed February 2018	33.4 miles northwest
BUREAU OF LAND MANAGEMENT					
47.	Truckhaven Exploratory Well Drilling [(a)] [(rr)]	Orni 5, LLC	Drilling of four geothermal exploratory wells within the Truckhaven Geothermal Leasing Area.	Approved	53.6 miles northwest
48.	Truckhaven Seismic Exploration [(a)] [(ss)]	Orni 5, LLC	Conduct a 23.5-square mile three dimensional (3D) seismic survey to evaluate the geology of the Truckhaven Geothermal Leasing area.	Approved	54.4 miles northwest

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area
49.	US Gypsum Company Expansion/ Modernization Project [(q)(tt)]	United States Gypsum Company (USG)	Proposed Action includes expanding existing gypsum quarry, replacing the existing plant water supply pipeline, and constructing a new water supply pipeline for the Quarry. Proposal also includes mitigation measures to reduce groundwater impacts to individual wells in the Ocotillo-Coyote Wells Groundwater Basin.	Record of Decision published Jan. 2020 Addendum #2 to Final EIS/EIR	48.1 miles southwest

Notes: ICAPCD = Imperial County Air Pollution Control District. IID = Imperial Irrigation District kV = kilovolt
MW = megawatt MWH = megawatt hour NEPA = National Environmental Policy Act.
PV = photovoltaic USFWS = United States Fish and Wildlife Service IS = Initial Study

Sources:

(a) Bureau of Land Management ePlanning Project Search. https://eplanning.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do. Accessed on February 4, 2020.

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(b) County of Imperial, 2011. Final EIR for the Centinela Solar Energy Project. December 2011.
(c) County of Imperial, 2012a. Final EIR for Campo Verde Solar Project. July 2012.
(d) County of Imperial, 2012b. Final EIR for the Mount Signal and Calexico Solar Farm Projects Imperial County, California. March 2012.
(e) County of Imperial, 2014a. Final EIR for Seville Solar Farm Complex. October 2014.
(f) County of Imperial, 2014b. Final EIR for Wistaria Ranch Solar Energy Center Project. December 2014.
(g) County of Imperial, 2015a. Final EIR for Iris Cluster Solar Farm Project. January 2015.
(h) County of Imperial, 2015b. MND for Valencia 2 Solar Project. August 2015.
(i) County of Imperial, 2015c. MND for Valencia 3 Solar Project. August 2015.
(j) County of Imperial, 2016. Final Supplemental EIR for the Campo Verde Battery Energy Storage System. December 2016.
(k) County of Imperial, 2017a. IS for Midway Solar Farm III (CUP #17-0013). August 30, 2017.
(l) County of Imperial, 2017b IS for Hell's Kitchen Exploratory Wells Project. April 2017
(m) County of Imperial, 2018a. Final EIR for the Citizens Imperial Solar, LLC Project. October 2018.
(n) County of Imperial, 2018b. Final EIR for Laurel Cluster Solar Farms Project. August 2018.
(o) County of Imperial, 2018c. Final EIR for Seville 4 Solar. October 2018.
(p) County of Imperial, 2018d. IS for Desert Highway Farms, LLC Project. November 2018.
(q) County of Imperial, 2019a. IS for U.S. Gypsum Company Expansion/Modernization Project Addendum #2., February 2019.
(r) County of Imperial, 2019b. Final EIRVEGA SES Solar Energy Project. January 2019.
(s) County of Imperial, 2019c. Final EIR for the Drew Solar Project. November 2019.
(t) County of Imperial, 2019d. Final Supplemental EIR for Le Conte Battery Energy Storage System. October 2019.
(u) County of Imperial, 2019e. Imperial County Planning & Development Service's Renewable Energy GIS Mapping Application. Accessed on February 6, 2019.

TABLE 7-2. POTENTIAL CUMULATIVE PROJECTS – GLAMIS SPECIFIC PLAN

Map No.	Project Name	Applicant	Summary Project Description	Status	Distance to Specific Plan Area

(v) County of Imperial, 2019f. IS for Desert Valley Company Monofill Expansion Project. December 2019.
(w) County of Imperial, 2019g. Initial Study and NOP Wister Solar Energy Facility Project. November 2019.
(x) County of Imperial, 2020a. Initial Study, Environmental Checklist Form & Mitigated Negative Declaration for IS#19-0021. June 2020.
(y) County of Imperial, 2020b. Initial Study, Environmental Checklist Form & Negative Declaration for Agess, Inc., CUP 20-0001. August 2020.
(z) County of Imperial, 2020c. Initial Study, Environmental Checklist Form & Negative Declaration for CUP19-0033. June 2020.
(aa) County of Imperial, 2020d. Initial Study, Environmental Checklist Form & Negative Declaration for CUP #20-0003-MCFA. July 2020.
(bb) County of Imperial, 2020e. Initial Study, Environmental Checklist Form & Negative Declaration for CUP #20-0009 et al. October 2020.
(cc) County of Imperial, 2020f. Initial Study, Environmental Checklist Form & Negative Declaration for Fondomonte California LLC. June 2020.
(dd) County of Imperial, 2020g. Initial Study, Environmental Checklist Form & Negative Declaration for Heber 2 Geothermal Repower Project. May 2020.
(ee) County of Imperial, 2020h. Initial Study, Environmental Checklist Form & Negative Declaration for IS20-0020 Title 9 Revisions to Division 4, 5, 8, 10, 12, 14 & 16. October 2020.
(ff) County of Imperial, 2020i. Initial Study, Environmental Checklist Form & Negative Declaration for Lack Road Bridge Replacement Project and County Project No. 6421. February 2020.
(gg) County of Imperial, 2020j. Initial Study, Environmental Checklist Form & Negative Declaration for Susan K. Casey, Parcel Map 02484. May 2020.
(hh) County of Imperial, 2020k. Initial Study, Environmental Checklist Form & Negative Declaration for T. & J. Sutter. October 2020.
(ii) County of Imperial, 2020l. Initial Study, Environmental Checklist Form & Negative Declaration for West Wind Parking Storage Inc. August 2020.
(jj) County of Imperial, 2020m. Initial Study, Environmental Checklist Form & Negative Declaration for Winterhaven Drive LLC. October 2020.
(kk) County of Imperial, 2020n. Initial Study, Environmental Checklist Form & Negative Declaration for ZC18-0006. February 2020.
(ll) County of Imperial, 2020o. Initial Study, Environmental Checklist Form for Valencia 3 Solar Project. June 2020.
(mm) ICTC, 2020. Imperial County Transportation Commission Website (http://www.imperialctc.org/sr-78-glamis-crossing). Accessed September 24, 2020.
(nn) IID, 2014. Strategic Transmission Expansion Plan Fact Sheet, February 2014. Available at: https://www.iid.com/home/showdocument?id=8596. Accessed on February 4, 2020.
(oo) IID, 2017. Red Hill Bay Wetlands Restoration Project Draft Initial Study, November 2017.

Sources (Continued):

(pp) Richard Pata Engineering, Inc. 2017. Coyne Ranch Specific Plan. Revised August 1, 2017.
(qq) Stantec Consulting Services, 2020. Westside Canal Battery Storage Project Initial Study. April 9, 2020.
(rr) U.S. Dept. of the Interior BLM, 2019. Truckhaven Geothermal Exploration Well Project Final Environmental Assessment and FONSI (DOI-BLM-CA-D070-2019-0016-EA). October 2019.
(ss) U.S. Dept. of the Interior BLM, 2019. Truckhaven Seismic Exploration Categorical Exclusion (DOI-BLM-CA-D070-2019-0005-CX). 2019.
(tt) U.S. Dept. of the Interior BLM, 2019. US Gypsum Company Expansion/Modernization Project Final Supplemental EIS (DOI-BLM-CA-D070-2018-0049-EIS. 2019.
(uu) Veizades & Associates, 2015. Preliminary Closure/Post Closure Maintenance Plan for the Desert Valley Company Phase III (Cell 3). November 2015.
(vv) County of Imperial, 2021. Initial Study, Environmental Checklist Form for VEGA 2, 3 & 5 Solar Project. May 2021.
(ww) County of Imperial, 2021. Initial Study and NOP for VEGA 4 Solar Project. April 2021.

SOURCE: Basemap-ESRI; ICPDS NOTE: Please reference Potential Cumulative Projects Table for additional project details. Potential Cumulative Project 40 is not mapped.

N
0 3.5 7 Miles

Location of Potential Cumulative Projects
Glamis Specific Plan
Figure 7-1

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8.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires an environmental impact report (EIR) to contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore not discussed in detail in the EIR. The proposed Specific Plan would not have the potential to cause significant impacts to the resources discussed below.

8.1 Agriculture and Forestry Resources

The proposed Specific Plan would be considered to have a significant impact if it would:

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

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

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?

Analysis

The Glamis Specific Plan Area (GSPA) is desert with some development and has not been used for farming. The land has been privately owned for many years and is not included in the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP) database. No impacts to agricultural resources would occur.

Impact 8.1-1:	**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?**

According to the 2018FMMP Map for Imperial County, the GSPA does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (California DOC, 2018). No impacts related to the conversion of FMMP farmlands to non-agricultural use would occur.

Impact 8.1-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The existing General Plan land use designation is " Glamis Specific Plan Area" and the existing zoning is Open Space/Preservation (S-2) and Medium Commercial (C-2). Agricultural uses are not allowed in the C-2 zone. While the storage of agricultural products and other agricultural activities are an allowable use within the S-2 Zone, there are no agricultural activities ongoing within the GSPA. Additionally, the GSPA is not covered under a Williamson Act contract (California DOC, 2016). For these reasons, the proposed Specific Plan would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impacts are identified for this issue area.

Impact 8.1-3: 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))?

Neither the GSPA nor surrounding areas are used for timber production or are defined as forest lands. The proposed Specific Plan would not conflict with any zoning designations designed to preserve timber or agricultural resources. No impact would occur under this threshold.

Impact 8.1-4: Result in the loss of forest land or conversion of forest land to non-forest use?

There are no existing forest lands either on-site or in the immediate vicinity of the GSPA. The proposed Specific Plan would not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impacts would occur.

Impact 8.1-5: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

The proposed Specific Plan does not include changes in the existing environment which, due to their location or nature would result in the conversion of neighboring farmland to non-agricultural use. The GSPA is surrounded by open desert and the nearest agricultural lands occur approximately 13 miles to the west. The proposed Specific Plan would not result in the conversion of farmlands off-site to non-agricultural uses and no impact would occur.

8.2 Mineral Resources

The proposed Specific Plan would generally be considered to have a significant effect if it 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?

Analysis

Impact 8.2-1	**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?**

A number of mineral resources are currently being extracted in Imperial County including gold, gypsum, sand, gravel, lime, clay, stone, kyanite, limestone, sericite, mica, tuff, salt, potash, and manganese. According to the Existing Mineral Resources Map (Figure 8) in the Conservation and Open Space Element of the County of Imperial General Plan (2016), no known mineral resources occur within the vicinity of the GSPA nor are there any mapped mineral resources within the GSPA itself (County of Imperial, 2016). Thus, no impacts related to the loss of availability of a known mineral resource would occur.

Impact 8.2-2	**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?**

Same as Impact 8.2-1. As previously discussed, no known mineral resources occur within or near the GSPA. Thus, no impacts related to the loss of the availability of a known mineral resource would occur.

8.3 Recreation

The proposed Specific Plan would generally be considered to have a significant effect if it would:

1) 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?

2) Include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment?

Analysis

Impact 8.3-1:	**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?**

There are no existing neighborhood parks, regional parks, or other recreational facilities within the GSPA. The Imperial Sand Dunes Recreation Area (ISDRA) is located south of the GSPA. Adoption of the proposed Specific Plan would create a distinctive master-plan for recreation-serving land uses which are consistent with the historical use of the Glamis area and the ISDRA. However, implementation of the proposed Specific Plan would not increase visitation to the ISDRA. Therefore, implementation of the proposed Specific Plan would increase the use of existing neighborhood and regional parks or other recreational facilities.

Impact 8.3-2: Include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment?

The proposed Specific Plan would provide an opportunity for a variety of recreational activities to complement the established "Glamis" sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as off highway vehicle [OHV] training, OHV rentals, etc.), amusement facilities, Desert Tours (off road experience), racetrack, park/playground/picnic area, and other recreational-based activities. With the implementation of aesthetics, air quality, biological and cultural/tribal resources, geology, paleontology and hydrology/water quality mitigation measures (MM) impacts associated with the construction of these facilities would be reduced to below a level of significance.

8.4 Wildfires

The proposed Specific Plan would generally be considered to have a significant effect if the GSPA is located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would:

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

2) Exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors?

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

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?

Analysis

Impact 8.4-1: Substantially impair an adopted emergency response plan or emergency evacuation plan?

According to the California Department of Forest and Protection's *Draft Fire Hazard Severity Zone Map for Imperial County*, the GSPA is not located within or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection, 2007). Similarly, the GSPA is not located in or near a state responsibility area and is not classified as a very high severity zone in the Draft Local Responsibility Area for Imperial County. As noted in Section 5.8 Hazards and Hazardous Materials, the implementation of the proposed Specific Plan would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact would occur.

Impact 8.4-2: Exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors?

The GSPA is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection, 2007). Therefore, the proposed Specific Plan would not exacerbate wildfire risks. No impact would occur.

Impact 8.4-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The GSPA is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection, 2007). The proposed Specific Plan would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact would occur.

Impact 8.4-4: 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?

The GSPA is not located in or near a state responsibility area or within lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection, 2007). The proposed Specific Plan would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

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9.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed Specific Plan and evaluates them, as required by CEQA.

9.1. Introduction

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternative analysis in the Draft EIR (Sections 15126.6(a) through (f)).

- "The discussion of alternatives shall 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 or would be more costly." (Section 15126.6(b))
- "The specific alternative of 'No Project' shall also be evaluated along with its impact." (Section 15126.6(e)(1))
- "The No Project analysis shall discuss the existing conditions at the time the NOP is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (Section 15126.6(e)(2))
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (Section 15126.6(f))
- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." (Section 15126.6(f)(1))
- "For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (Section 15126.6(f)(2)(A))

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (Section 15126.6(f)(3))

9.2. Alternatives Analysis Format and Methodology

CEQA Guidelines Section 15126.6(d) provides that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project." Under CEQA Guidelines Section 15151, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of the Project alternatives need not be as thorough or detailed as the analysis of the Project itself.

The level of analysis in the following sections is sufficient to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. In addition, each alternative is evaluated to determine whether the Project objectives, identified in Section 6.2, would be substantially attained by the alternative.

The evaluation of each alternative also considers the anticipated net environmental impacts after implementation of feasible Mitigation Measures (MM). The net impacts of the alternatives for each environmental issue area are classified as either having no impact, a less-than-significant impact, or a significant and unavoidable impact. These impacts are then compared to the corresponding impact for the Project in each environmental issue area. To facilitate the comparison, the analysis identifies whether the net incremental impact would clearly be less, similar, or greater than that identified for the Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic Project objectives.

9.3. Alternatives Development and Screening

This section outlines the process used by the Imperial County Planning and Development Services Department to develop the alternatives to be analyzed in this Draft EIR. Alternatives considered by the Applicant and the Imperial County Planning and Development Services Department were evaluated using the CEQA criteria and requirements listed below. No project alternatives were suggested during the public scoping process.

- Does the alternative feasibly accomplish most of the basic goals and objectives of the proposed Specific Plan?
- Does the alternative substantially lessen one or more of the significant environmental effects of the proposed Specific Plan, or, conversely, would the alternative create adverse effects potentially greater than those of the proposed Specific Plan?

- Is the alternative technically and/or economically feasible to construct and operate?

Alternatives that met most or all of the criteria listed above were carried forward for analysis and are detailed in Section 9.5. Those that did not meet the above criteria or were eliminated from further analysis.

9.4. Summary of Potentially Significant Impacts of the Proposed Specific Plan

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives of the proposed Specific Plan. Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed Specific Plan include those that are capable of avoiding or substantially lessen any significant effects of the proposed Specific Plan, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

The proposed Specific Plan has the potential to have significant adverse impacts on air quality, biological resources; cultural and tribal cultural resources; geology and soils and paleontological resources; hydrology/water quality, public services, transportation, and utilities within the County. However, mitigation measures (MM) described in Chapter 5 of this Draft EIR would reduce impacts for these resource areas to less than significant. Therefore, per the CEQA Guidelines, this alternatives analysis focuses on alternatives that are capable of avoiding or substantially lessening project effects listed above.

Section 9.5, below, restates the applicants' project objectives. Section 6.2 summarizes the proposed Project. Section 9.6, 9.7 and 9.8 present alternatives fully analyzed in this Draft EIR and provide a comparison of alternatives. Section 9.9 makes a determination about the environmentally superior alternative.

9.5. Project Objectives

As described in **Chapter 4.0**, *Project Description*, the following objectives have been established for the proposed Specific Plan and will aid decision makers in the review of the Plan and associated environmental impacts:

- Create a man-made environment that is compatible with the natural environment, surrounding land uses, and the desert climate.
- Ensure that development within the planning area is consistent with the County's General Plan and will protect public health, safety and general welfare, while complementing surrounding land uses and zoning.

- Provide design criteria that will guide developer(s) and the County in the development of proposed land uses by including descriptive text and illustrative exhibits setting forth the foundation of the overall development of the Glamis Specific Plan Area (GSPA).
- Enable Special Events through implementation of a Special Events Management Plan (SEMP).
- Adhere to the Zoning Ordinance for the proposed Specific Plan in Section 3, Zoning Ordinance.
- Provide recreational and ancillary facilities that serve the needs of the Glamis community and recreational visitors.

9.6. No Project/Existing Adopted Plan Alternative (Alternative 1)

Alternative 1 is the No Project / Existing Adopted Plan Alternative. Consideration of the No Project Alternative is required by Section 15126.6(e) of the CEQA Guidelines. The analysis of the No Project / No Build Alternative must discuss the existing conditions at the time the Notice of Preparation (NOP) was published (October 15, 2020), as well as: "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" [CEQA Guidelines Section 15126.6 (e) (2)]. The requirements also specify that: "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed" [CEQA Guidelines Section 15126.6 (e) (3) (B)].

The purpose of describing and analyzing a No Project / No Build Alternative is to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed Project. The No Project / No Build Alternative analysis is not the baseline for determining whether the environmental impacts of a proposed project may be significant, unless the analysis is identical to the environmental setting analysis that does establish that baseline.

The No Project / No Build Alternative for a development Project on an identifiable property consists of the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project / No Build Alternative (Alternative 1) assumes that no new development proposed by the Specific Plan would occur within the GSPA. Thus, the future development of commercial recreation uses would not occur. Under the No Project / No Build Alternative, the GSPA would remain undeveloped and vacant. Special events would continue to operate under their existing Conditional Use Permits (CUPs). The existing zoning within the GSPA of S-2 Open Space / Preservation and C-2 Commercial General would remain. Thus, environmental effects under this Alternative would be similar to existing site conditions, as described in the existing setting sections of each analysis in Chapter 5 of this Draft EIR. However, impacts of this Alternative relative to each issue area are discussed below.

Impacts Compared to Project Impacts

The following compares environmental impacts associated with the No Project Alternative as compared to the impacts of the proposed Specific Plan.

Under the No Project/No Development Alternative, the proposed Specific Plan would not be pursued and the GSPA would remain in its existing condition and continue to support off highway vehicle (OHV) recreation related activities for the foreseeable future. As an area that is desert and generally undeveloped, the GSPA would remain in unincorporated Imperial County and there would be no changes to the existing Imperial County General Plan designations of the area as a Specific Plan or the zoning of the Glamis Beach Store as C-2 (Medium Commercial) while the remainder of the GSPA would remain zoned as S-2 (Open Space/Preservation).

The purpose of this alternative is to evaluate what would occur if the proposed Specific Plan does not advance and the GSPA remains in its existing condition for the foreseeable future. The No Project / No Development Alternative evaluates the scenario in which the existing Specific Plan is pursued.

Impact Analysis

The proposed Specific Plan would result in potentially significant impacts on air quality, biological resources; cultural and tribal cultural resources; geology and soils and paleontological resources; hydrology/water quality, public services, transportation, and utilities, all of which can be mitigated to below a level of less than significant. None of these potentially significant impacts would occur under the No Project Alternative.

Conclusion

The No Project/No Development Alternative would avoid the proposed Specific Plan's potentially significant impacts and would have less impact on all environmental topical areas. However, this alternative would not advance any of the project objectives, including those related to positively contributing to the local economy; facilitating the development of the land to its highest and best use; clustering development to avoid impacting sensitive areas; and providing a variety of recreational and business amenities.

9.7. Modified Footprint (Alternative A)

An alternative site plan (Alternative A) for the proposed Specific plan was developed that avoids all development of the existing RV storage facility which is located in Areas 2 and 3 and are proposed for a change in zoning to Commercial Recreation (C-3). This alternative is being considered due to the length of the current lease, 30 years, for the existing recreational vehicle (RV) storage facility. This alternative is being considered to evaluate the feasibility of developing the proposed Specific Plan.

The Project consists of the development of a Specific Plan for the GSPA. A Specific Plan is a regulatory tool for the thoughtful and systematic implementation of a General Plan for a defined area. The proposed Specific Plan is intended to meet the Specific Plan requirements as set forth in California State Law (California Government Code [CGC] Section [§] 65450) through which the State authorizes cities and counties to adopt Specific Plans as appropriate tools in implementing their General Plans. Under the provision of this Statute the County has the authority to include detailed regulations, conditions, programs and all proposed legislation within the Specific Plan that are necessary for the systematic implementation of the General Plan. Currently, an RV storage facility is located on 50 acres of the site on the north side of State Route 78 (SR-78). It is under a 30-year lease and was initially approved under a CUP in 2007 by the County. Due to the length of this lease this area would not be available for development until 2037 at the earliest.

Figure 9-1 presents the site plan for Alternative A, with the existing RV storage facility not being included within the GSPA. Alternative A would still allow the development of Areas 2 and 3 of the GSPA and would not preclude development of any of the other areas. Alternative A would accomplish the project objectives, it would not prevent development of any of the other areas. For these reasons, the Alternative A was not eliminated from further consideration in the Draft EIR.

Impacts Compared to Project Impacts

The following compares environmental impacts associated with the Alternative A as compared to the impacts of the proposed Project.

Aesthetics

Under Alternative A, the existing RV park would not be developed. No significant visual aesthetic impact associated with the proposed Specific Plan has been identified as the project facilities would not impact scenic resources, result in the substantial degradation of the existing visual character of the GSPA, or result in light/glare impacts. In this context, Alternative A would not reduce or avoid an impact related to aesthetics and visual resources, and would result in less than significant impacts similar to the proposed Specific Plan.

Air Quality

Under Alternative A, air emissions during construction would be less than the proposed Specific Plan because of the reduced site development. As discussed in Section 4.3, Air Quality, the proposed Specific Plan would not exceed the Imperial County Air Pollution Control District's (ICAPCD's) significance thresholds for reactive organic gases (ROG), carbon monoxide (CO), oxides of nitrogen (NO_x), and particulate matter (PM_{10}) during construction and operation. Although no significant air quality impacts would occur, all construction projects within Imperial County must comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust. In addition, the ICAPCD's Air Quality Handbook lists additional feasible mitigation measures that may be warranted to control emissions of fugitive dust and combustion exhaust. The same mitigation measures would be required for this alternative

SOURCE: The Altum Group, 2020.

Modified Footprint (Alternative A)
Glamis Specific Plan
Figure 9-1

as with the proposed Specific Plan. This alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors.

Biological Resources

Due to the developed nature of the existing RV park, there are no biological resources present within its footprint. Implementation of Alternative A would have the same environmental impact on biological resources as the proposed Specific Plan.

Cultural Resources

The existing RV park is not eligible for listing on the National Register of Historic Places (NRHP) or the California Register of Historic Places (CRHR). However, ground disturbing activities associated with the proposed Specific Plan during construction would have the potential to cause substantial adverse changes to resources that escaped detection on the survey and/or buried prehistoric and historic resources due to the moderately high potential of the GSPA. If such resources are encountered during construction and those resources meet the eligibility criteria of the CRHR, the impact would cause a substantial adverse change in the significance of a historical or archaeological resource. This would be a potentially significant impact to cultural resources. Similar to the Proposed Action, this alternative would require the incorporation of MM identified for the proposed Specific Plan to minimize these impacts to a less than significant level. Overall, since there would be less ground disturbance the potential for impact to undiscovered cultural resources would be reduced.

Geology and Soils and Paleontological Resources

Under Alternative 2, while the overall project footprint would be reduced, grading and construction of new facilities would still occur. Therefore, this alternative would still be subject to potential impacts related to ground shaking. Similar to the proposed Specific Plan, this alternative would require the incorporation of mitigation measures identified for the proposed Specific Plan to minimize these impacts to a less than significant level. Compared to the proposed Project, this alternative would result in similar geological and soil impacts.

Greenhouse Gases

Under Alternative A, greenhouse gas emissions (GHG) emissions during construction would be less than the proposed Specific Plan because of the reduced site development. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Similar to the proposed Specific Plan, this alternative would not exceed SCAQMD's threshold of 3,000 metric tons carbon dioxide equivalent ($MTCO_2e$). Compared to the proposed Specific Plan, this alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy,

although to a lesser degree. Because no significant GHG impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Hazards and Hazardous Materials

Similar to the proposed Specific Plan, no potential exposure to hazardous materials would occur under this alternative. Impacts would be similar to that described for the proposed Specific Plan. Compared to the proposed Specific Plan, this alternative would result in similar hazards and hazardous materials impacts.

Hydrology and Water Quality

Alternative A would result in modifications to the existing drainage patterns and the volume of storm water runoff, as this alternative would keep the existing RV park, which is an impervious area, on site. This Alternative would result in an increase in impervious area compared to the proposed Specific Plan. Thus, this alternative would realize a minor increase in the corresponding impacts on hydrology and on-site drainage; however, the same mitigation measures would be applicable to this alternative. Similar to the proposed Specific Plan, no impacts would result from flooding and facilities will not be placed within floodplains. This alternative would result in a slightly increased impact related to hydrology/water quality as compared to the proposed Specific Plan.

Land Use and Planning

Similar to the proposed Specific Plan, Alternative A would not divide an established community. Similar to the proposed Specific Plan, Alternative A would require an amendment to Imperial County's General Plan Land Use Element to change the land use designation on the general area of the Glamis Beach Store from C-2 (Medium Commercial) and remainder of the GSPA which is zoned as S-2 to Commercial Recreation I, II, and III and a small portion to S-1 (Open Space/Recreation (Figure 4-1). As with the proposed Specific Plan, this alternative would not conflict with any applicable Habitat Conservation Plan (HCP) or Natural Communities Conservation Plan (NCCP). Land use and planning impacts resulting from this alternative would be similar to those identified for the proposed Specific Plan. Because no significant Land Use/Planning impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Noise

As with the proposed Specific Plan, Alternative 2 would not result in significant noise impacts associated with construction activities. As with the proposed Specific Plan, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive ground-borne vibration, or expose persons to excessive aircraft noise. Because no significant noise impact has been identified

associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Population and Housing

Similar to the proposed Specific Plan, Alternative A would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Similar to the proposed Specific Plan, Alternative A could result in a seasonal population growth (October through May) through the expansion of commercial and recreational activities within the GSPA. These activities would result in the development of new businesses and would require employee housing to be constructed. The proposed Specific Plan allows for some limited permanent residential land uses within the GSPA, which consist mostly of employee housing. The proposed zoning changes allow for the development of condominiums. Thus, the proposed Specific Plan could induce unplanned population growth through the development of new businesses, however, this population growth would be seasonal (October through May) and small. Population and housing impacts resulting from this alternative would be similar to those identified for the proposed Specific Plan. Because no significant Population and Housing impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Public Services

Alternative A would require the same public services as the proposed Specific Plan. While the overall project footprint would be slightly smaller, the impacts of this alternative to public services and associated service ratios would be similar. Like the proposed Specific Plan, this alternative would be conditioned to provide law enforcement and fire service development impact fees. Therefore, this alternative would result in a similar impact related to public services as the proposed Specific Plan.

Transportation

This alternative would result in a lower level of vehicle and truck trips within the GSPA as compared to the proposed Specific Plan. The increase in vehicular traffic was identified as a less than significant impact for the proposed Project. In this context, Alternative A would not reduce or avoid an impact related to transportation/traffic, and would result in less than significant impacts similar to the proposed Specific Plan. As with the proposed Specific Plan, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards because of a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed Specific Plan, this alternative would result in a similar impact related to transportation/traffic.

Utilities

Similar to the proposed Specific Plan, Alternative A would require water service and energy for the operation of the solar facility. This alternative would enable the existing RV park to continue to operate which would utilize less water than the proposed Specific Plan. As a consequence, this alternative would result in slightly decreased water demands when compared to the proposed Specific Plan.

Conclusion

Alternative A would result in reduced impacts for the following environmental issues areas as compared to the proposed Specific Plan: air quality and GHG and a slight increase in impacts related to hydrology/water quality and utilities when compared to the proposed Specific Plan.

Alternative A would meet most of the basic objectives of the proposed Specific Plan and should remain under consideration.

9.8. Modified Footprint (Alternative B)

An alternative site plan (Alternative B) for the proposed Specific Plan was developed that avoids all development of the area along SR-78 immediately in front of the Glamis Beach Store in Planning Area 1 which is proposed for a change in zoning to Commercial Recreation 3 (C-3) and south of SR-78 in Area 6 which is proposed for a change in zoning to Commercial Recreation 1 (C-1). This alternative is being considered due to the potential development of a new overhead structure in the current location of SR-78 that would carry both SR-78 and a new protected OHV trail lane over the rail line. This alternative is being considered to evaluate the feasibility of developing the proposed Specific Plan.

The overhead structure would follow the existing SR-78 alignment. The trail portion of the structure would be located on the south side of the highway. Beginning on the west end near the Glamis Beach Store, the approach would rise steeply to make the required clearance over the rail line and then descend less steeply on the eastern side. To connect with many of the existing designated routes terminating at Ted Kipf Road, a modification to Ted Kipf Road or a parallel trail would be needed.

Once OHVs enter the wall-supported approach at either end of the SR-78 alternative, the only exit would be to the opposite side of the rail line. A barrier would separate the OHVs from traffic and cut off any access across SR-78. Bicycle traffic along SR-78 would continue to use the shoulder bike lanes. The raised alignment of SR-78 would cut off the current access points for Wash Road and the continuation of Ted Kipf Road west of the existing rail crossing. This would require a significant relocation and reconstruction of these roads including placing Wash Road further into the dune area and through a separate part of the private property. **Figure 9-2** presents the site plan for the Modified footprint, with the area that would be affected by the SR-78 overpass not being

SOURCE: The Altum Group, 2020.

Modified Footprint (Alternative B)
Glamis Specific Plan
Figure 9-2

included within the GSPA. The Modified Footprint Alternative would still allow the development of Planning Area 1 of the GSPA and would not preclude development of any of the other areas. The Modified Footprint Alternative would accomplish the project objectives, it would not prevent development of any of the other areas. For these reasons, the Modified Footprint Alternative was not eliminated from further consideration in the EIR.

The following compares environmental impacts associated with the Alternative A as compared to the impacts of the proposed Project.

Aesthetics

Under Alternative B, the area along SR-78 immediately in front of the Glamis Beach Store in Planning Area 1 and south of SR-78 in Area 6 would not be developed. No significant visual aesthetic impact associated with the proposed Specific Plan has been identified as the project facilities would not impact scenic resources, result in the substantial degradation of the existing visual character of the GSPA, or result in light/glare impacts. In this context, Alternative B would not reduce or avoid an impact related to aesthetics and visual resources and would result in less than significant impacts similar to the proposed Specific Plan.

Air Quality

Under Alternative B, air emissions during construction would be less than the proposed Specific Plan because of the reduced site development. As discussed in Section 5.2, Air Quality, the proposed Project would not exceed the ICAPCD's significance thresholds for ROG, CO, NO_x, and PM_{10} during construction and operation. Although no significant air quality impacts would occur, all construction projects within Imperial County must comply with the requirements of ICAPCD Regulation VIII for the control of fugitive dust. In addition, the ICAPCD's Air Quality Handbook lists additional feasible mitigation measures that may be warranted to control emissions of fugitive dust and combustion exhaust. The same mitigation measures would be required for this alternative as with the proposed Specific Plan. This alternative would be consistent with existing air quality attainment plans and would not result in the creation of objectionable odors.

Biological Resources

Under Alternative B, the area along SR-78 immediately in front of the Glamis Beach Store in Planning Area 1 and south of SR-78 in Area 6 would not be developed. As discussed in Section 5.3, avian nests and small burros were identified in Planning Area 6. Under Alternative B Planning Area 6 would not be developed and these impacts would be avoided. Although this alternative would reduce the impacts to avian species and small mammals that could potentially be directly and indirectly impacted with implementation of the project, this alternative still has the potential to impact biological resources on the other portions of the Project site. Mitigation would still be required for impacts to biological resources; however, the overall number of nesting locations potentially impacted would be less. Other impacts would be similar to that described for the project.

Compared to the proposed Project, this alternative would result in a reduction in impacts on biological resources but would still require mitigation. Overall, the impact on biological resources would be less as compared to the proposed Project.

Cultural Resources

The existing RV park is not eligible for listing on the NRHP or the CRHR. However, ground disturbing activities associated with the proposed Project during construction would have the potential to cause substantial adverse changes to resources that escaped detection on the survey and/or buried prehistoric and historic resources due to the moderately high potential of the GSPA. If such resources are encountered during construction and those resources meet the eligibility criteria of the CRHR, the impact would cause a substantial adverse change in the significance of a historical or archaeological resource. This would be a potentially significant impact to cultural resources. Similar to the project, this alternative would require the incorporation of mitigation measures identified for the proposed Specific Plan to minimize these impacts to a less than significant level. Overall, since there would be less ground disturbance the potential for impact to undiscovered cultural resources would be reduced.

Geology and Soils and Paleontological Resources

Under Alternative 2, while the overall project footprint would be reduced, grading and construction of new facilities would still occur. Therefore, this alternative would still be subject to potential impacts related to ground shaking. Similar to the project, this alternative would require the incorporation of mitigation measures identified for the proposed Specific Plan to minimize these impacts to a less than significant level. Compared to the proposed Specific Plan, this alternative would result in similar geological and soil impacts.

Greenhouse Gases

Under Alternative A, GHG emissions during construction would be less than the proposed Specific Plan because of the reduced site development. This alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Similar to the proposed Specific Plan, this alternative would not exceed SCAQMD's threshold of 3,000 MTCO2e. Compared to the proposed Specific Plan, this alternative would contribute to similar and desirable reductions in GHG emissions and associated contribution to global climate change through the production of renewable energy, although to a lesser degree. Because no significant GHG impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Project.

Hazards and Hazardous Materials

Similar to the proposed Specific Plan, no potential exposure to hazardous materials would occur under this alternative. Impacts would be similar to that described for the proposed Specific Plan. Compared to the proposed Specific Plan, this alternative would result in similar hazards and hazardous materials impacts.

Hydrology and Water Quality

Alternative B would result in modifications to the existing drainage patterns and the volume of storm water runoff on site. This Alternative would result in the creation of the same amount of impervious area compared to the proposed Specific Plan. Thus, this alternative would realize a similar impacts on hydrology and on-site drainage. Similar to the proposed Specific Plan, no impacts would result from flooding and facilities will not be placed within floodplains. This alternative would have similar impacts related to hydrology/water quality as compared to the proposed Specific Plan.

Land Use and Planning

Similar to the proposed Specific Plan, Alternative B would not divide an established community. Similar to the proposed Specific Plan, Alternative B would require an amendment to Imperial County's General Plan Land Use Element to change the land use designation on the general area of the Glamis Beach Store from C-2 (Medium Commercial) and remainder of the GSPA which is zoned as S-2 to Commercial Recreation I, II, and III and a small portion to S-1 (Open Space/Recreation (Figure 4-1). As with the proposed Specific Plan, this alternative would not conflict with any applicable HCP or NCCP. Land use and planning impacts resulting from this alternative would be similar to those identified for the proposed Specific Plan. Because no significant Land Use/Planning impact has been identified associated with the proposed Project, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Project.

Noise

As with the proposed Specific Plan, Alternative B would not result in significant noise impacts associated with construction activities. As with the proposed Project, operational impacts associated with this alternative would not expose persons or generate noise levels in excess of applicable noise standards, exposure persons to, or generate excessive groundborne vibration, or expose persons to excessive aircraft noise. Because no significant noise impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Population and Housing

Similar to the proposed Project, Alternative B would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Similar to the proposed Specific Plan, Alternative B could result in a seasonal population growth (October through May) through the expansion of commercial and recreational activities within the GSPA. These activities would result in the development of new businesses and would require employee housing to be constructed. The proposed Specific Plan allows for some limited permanent residential land uses within the GSPA, which consist mostly of employee housing. The proposed zoning changes allow for the development of condominiums. Thus, the proposed Specific Plan could induce unplanned population growth through the development of new businesses, however, this population growth would be seasonal (October through May) and small. Population and housing impacts resulting from this alternative would be similar to those identified for the proposed Specific Plan. Because no significant Population and Housing impact has been identified associated with the proposed Specific Plan, this alternative would not avoid or reduce a significant impact related to this issue and therefore, it is considered similar to the proposed Specific Plan.

Public Services

Alternative B would require the same public services as the proposed Specific Plan. While the overall project footprint would be slightly smaller, the impacts of this alternative to public services and associated service ratios would be similar. Like the proposed Specific Plan, this alternative would be conditioned to provide law enforcement and fire service development impact fees. Therefore, this alternative would result in a similar impact related to public services as the proposed Specific Plan.

Transportation

This alternative would result in a lower level of vehicle and truck trips within the GSPA as compared to the proposed Specific Plan. The increase in vehicular traffic was identified as a less than significant impact for the proposed Specific Plan. In this context, Alternative B would not reduce or avoid an impact related to transportation/traffic, and would result in less than significant impacts similar to the proposed Specific Plan. As with the proposed Specific Plan, this alternative would not impact any applicable plan, ordinance, or policy addressing the performance of the circulation system, conflict with an applicable congestion management program, change air traffic patterns, substantially increase hazards because of a design feature, result in inadequate emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Compared to the proposed Specific Plan, this alternative would result in a similar impact related to transportation/traffic.

Utilities

Similar to the proposed Specific Plan, Alternative B would require water service and energy for the operation of the solar facility. This alternative would the existing RV park to continue to operate

which would utilize less water than the proposed Specific Plan. As a consequence, this alternative would result in slightly decreased water demands when compared to the proposed Specific Plan.

Conclusion

Alternative B would result in reduced impacts for the following environmental issues areas as compared to the proposed Specific Plan: air quality and GHG and biological resources when compared to the proposed Specific Plan.

Alternative B would meet most of the basic objectives of the proposed Specific Plan and should remain under consideration.

9.9. Environmentally Superior Alternative

As required by CEQA Guidelines, Section 15126.6, an EIR must identify an "environmentally superior alternative," which is the alternative that has the least impact on the environment or would be capable of avoiding or substantially lessening any significant impacts of the project. Table 9-1, Summary of Alternatives Compared to the Proposed Project, shows each alternative's environmental impacts compared to the impacts of the proposed Project.

The alternative that results in the least environmental impact, considering both the frequency and magnitude of the impact, is the environmentally superior alternative. In cases where the No Project Alternative is environmentally superior, the EIR is required to identify the next environmentally superior alternative among the others evaluated. Alternative A (No Project/No Development) is the alternative that results in the least environmental impact.

As shown in Table 9-1, Alternative 1 (No Project/No Expansion Alternative), would be environmentally superior to the proposed Project for the resource areas analyzed in the EIR. As required by CEQA, the next environmentally superior alternative is Alternative B (Reduced Footprint) Alternative. Therefore, Alternative B would be environmentally superior to the proposed Project under two resource areas and environmentally similar to the Project under the remaining resource areas. However, Alternative B would not substantially lessen the significant resource effects of the Project; therefore, decision-makers are not obliged by CEQA to select this alternative.

TABLE 9-1. SUMMARY OF ALTERNATIVES COMPARED TO THE PROPOSED PROJECT

Environmental Resource	Proposed Project	No Project/ No Expansion (Alternative 1)	Modified Project Footprint (Alternative A)	Modified Project Footprint (Alternative B)
1. Aesthetics	LTS	NI	LTS	LTS
2. Air Quality	LTS-MM	NI / -	LTS-MM / =	LTS-MM / -
3. Biological Resources	LTS-MM	NI / +	LTS-MM /+	LTS-MM / -
4. Cultural Resources	LTS-MM	NI / +	LTS-MM / =	LTS-MM / -
5. Energy	LTS	NI	LTS	LTS
6. Geology and Soils	LTS-MM	NI / +	LTS-MM / =	LTS-MM / -
7. Greenhouse Gas Emissions	LTS	NI / -	LTS / =	LTS / -
8. Hazards and Hazardous Materials	LTS	NI / +	LTS / =	LTS / =
9. Hydrology and Water Quality	LTS-MM	NI / +	LTS-MM / =	LTS-MM / =
10. Land Use and Planning	LTS	NI / +	LTS / =	LTS / =
11. Noise	LTS	NI / +	LTS / =	LTS / =
12. Population and Housing	LTS	NI / +	LTS / =	LTS / =
13. Public Services	LTS	NI / +	LTS / =	LTS / =
14. Transportation and Traffic	LTS	SU / -	LTS / =	LTS / =
15. Utilities and Service Systems	LTS	NI / +	LTS /	LTS / =
16. Tribal Cultural Resources	LTS-MM	NI / +	LTS-MM / =	LTS-MM / -
		+ 7 - 3 = 0	+ 2 - 0 = 8	+ 0 - 6 = 4
Meets Most of the Basic Project Objectives?	Yes	No	Yes	Yes

Notes:

NI Finding of no environmental impact

LTS Finding of less than significant environmental impact

LTS-MM Finding of less than significant environmental impact with mitigation measure

SU Finding of significant and unmitigable impact

\+ Alternative is superior (reduced impacts compared) to the proposed Project

\- Alternative is inferior (greater impacts compared) to the proposed Project

= Alternative is environmentally similar to the proposed Project or there is not enough information to make a superior or inferior determination.

10.0 PREPARERS

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None.

2.0 Introduction

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3.0 Project Background

None.

4.0 Project Description

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None

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9.0 Alternatives

None.

10.0 Preparers

None.

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