PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: October 10, 2019

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME 1:30 PM / No. 1

PROJECT TYPE: ZC #19-0002& Parcel Map #02483(Brandt Family Trust) SUPERVISOR DIST # 4

LOCATION: 7015 Brandt Road APN: 022-160-001-000

Calipatria, CA PARCEL SIZE: (±)266.34 AC

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A

ZONE (existing) A2/G&RG ZONE (proposed) A3/G&RG

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 10/10/2019

INITIAL STUDY: #19-0007

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐	NONE	☒	ATTACHED
AG	☒	NONE	☐	ATTACHED
APCD	☐	NONE	☒	ATTACHED
E.H.S.	☐	NONE	☒	ATTACHED
FIRE / OES	☒	NONE	☐	ATTACHED
SHERIFF	☒	NONE	☐	ATTACHED
OTHER	See Attached			

REQUESTED ACTION:

(See Attached)

Planning & Development Services
801 MAIN STREET, EL CENTRO, CA, 92243 442-265-1736
(Jim Minnick, Director)

☐ NEGATIVE DECLARATION
☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Zone Change #19-0002 and Parcel Map #02483
Brandt Family Trust

Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
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September 2019

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Zone Change #19-0002 and Parcel Map #02483 (Refer to Exhibit "A" & "B"). For purposes of this document, the above-mentioned project will be called the "proposed project".

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☐ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Mitigated Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency,

in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Mitigated Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Mitiigated Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Mitigated Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly

describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. Environmental Checklist

1. **Project Title**: Zone Change #19-0002 and Parcel Map #02483; Brandt Family Trust

2. **Lead Agency**: Imperial County Planning & Development Services Department

3. **Contact person and phone number**: Joe Hernandez, Planner IV, (442) 265-1736, ext. 1748

4. **Address**: 801 Main Street, El Centro CA, 92243

5. **E-mail**: joehernandez@co.imperial.ca.us

6. **Project location**: 7015 Brandt Road, Calipatria, CA

7. **Project sponsor's name and address**: Brandt Family Trust
   P.O. Box 118
   Brawley, CA 92227

8. **General Plan designation**: Agriculture

9. **Zoning**: A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone)

10. **Description of project**: The applicant proposes Zone Change #19-0002 to re-zone property identified as Assessor Parcel Number 022-160-001-000 (±266 acres) from A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone) to A3 (Heavy Agriculture) to expand the existing Brandt Cattle Feedyard to the east to add 30,000 cattle. The Rural and Geothermal Overlay Zone will remain as listed. Additionally, Parcel Map #02483 has been submitted proposing to subdivide this parcel as part of the expansion. Proposed Parcel A (±107 acres) will cover the feedlot expansion area and Proposed Parcel B (±158 acres) will remain in farming.

11. **Surrounding land uses and setting**: The project site is surrounded by Brandt Cattle Feedlot to the West, Calipatria domestic wastewater ponds to the East, farming surrounding the remainder of property.

12. **Other public agencies whose approval is required** Board of Supervisors, Planning Commission, Imperial County Public Works Department, Imperial County Environmental Health Services, Imperial County Fire Department, Regional Water Quality Control Board and Imperial Irrigation District.

13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1?** No, a letter has been sent out to the Quechan Indian Tribe on May 5, 2019 and no response has been received.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: ☐ Yes ☐ No

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☐	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☐
OFFICE EMERGENCY SERVICES	☐	☐	☐
APCD	☐	☐	☐
AG	☐	☐	☐
SHERIFF DEPARTMENT	☐	☐	☐
ICPDS	☐	☐	☐

Jim Minnick, Director of Planning/EEC Chairman Date:

PROJECT SUMMARY

A. Project Location: The proposed project site is located at 7015 Brandt Road, Calipatria, CA, being within a portion of Section 6, Township 12 South, Range 14 East, SBB&M. The (±)266.43 acre parcel is located on Imperial County Assessor Parcel (APN) 022-160-001-000.

B. Project Summary: The applicant has requested Zone Change #19-0002 and Parcel Map #02483 proposing to re-zone property identified as Assessor's Parcel Number 022-160-001-000 from A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone) to A3 (Heavy Agriculture) to expand the existing Brandt Cattle Feedyard (located to the west of the proposed parcel) to add 30,000 cattle and subdivide this parcel as part of the expansion with Proposed Parcel A (±107 acres) for the feedlot expansion area and Proposed Parcel B (±158 acres) remaining in farming.

Pursuant to the application, the expansion would require one extra truck for the daily feeding of the cattle. It would also require on average about one cattle truck/trailer per day to cover the incoming and outgoing cattle that would be in the new expansion area. Furthermore, the expansion would require the addition of approximately three to four additional employees.

The parcel currently has solar panels located at the northeast corner with the remainder being farmed at this time.

C. Environmental Setting: The project site is surrounded the existing Brandt Cattle Feedyard to the West, Calipatria domestic wastewater ponds to the East, and farming surrounding the remainder of the property.

D. Analysis: Under the Land Use Element of the Imperial County General Plan, the project site is designated as "Agriculture" and is zoned "A2/G&RG" (General Agriculture/Rural/Geothermal Overlay Zone) under the Imperial County's, Title 9, Land Use Ordinance, Section 90508.00, et. Seq. The proposed Zone Change application seeks to change the existing zone to the A3 (Heavy Agriculture) which permits animal "stockyards" and the Parcel Map would conform to the 40 acre minimum parcel size as both parcel will remain over 40 acres.

E. General Plan Consistency: The Imperial County General Plan designates this area as within the "Agriculture" land use designation. With the adoption and approve of the proposed Zone Change from A2/G&RG zone to the A3 zone, and the Proposed Parcel Map, could be found consistent with the adjacent existing large cattle feedlot and with the County of Imperial General Plan and Title 9, Land Use Ordinance.

Exhibit "A"
Vicinity Map

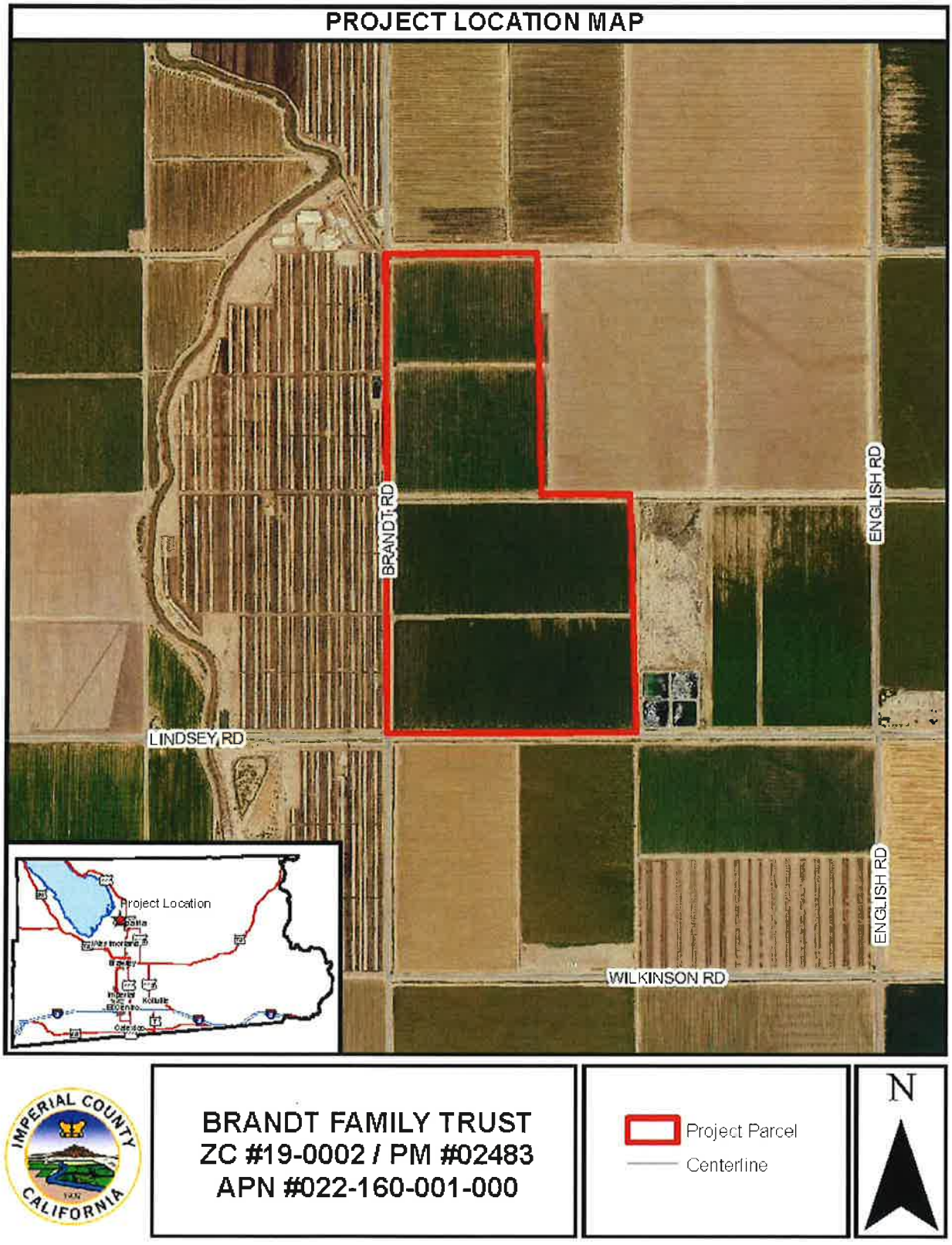
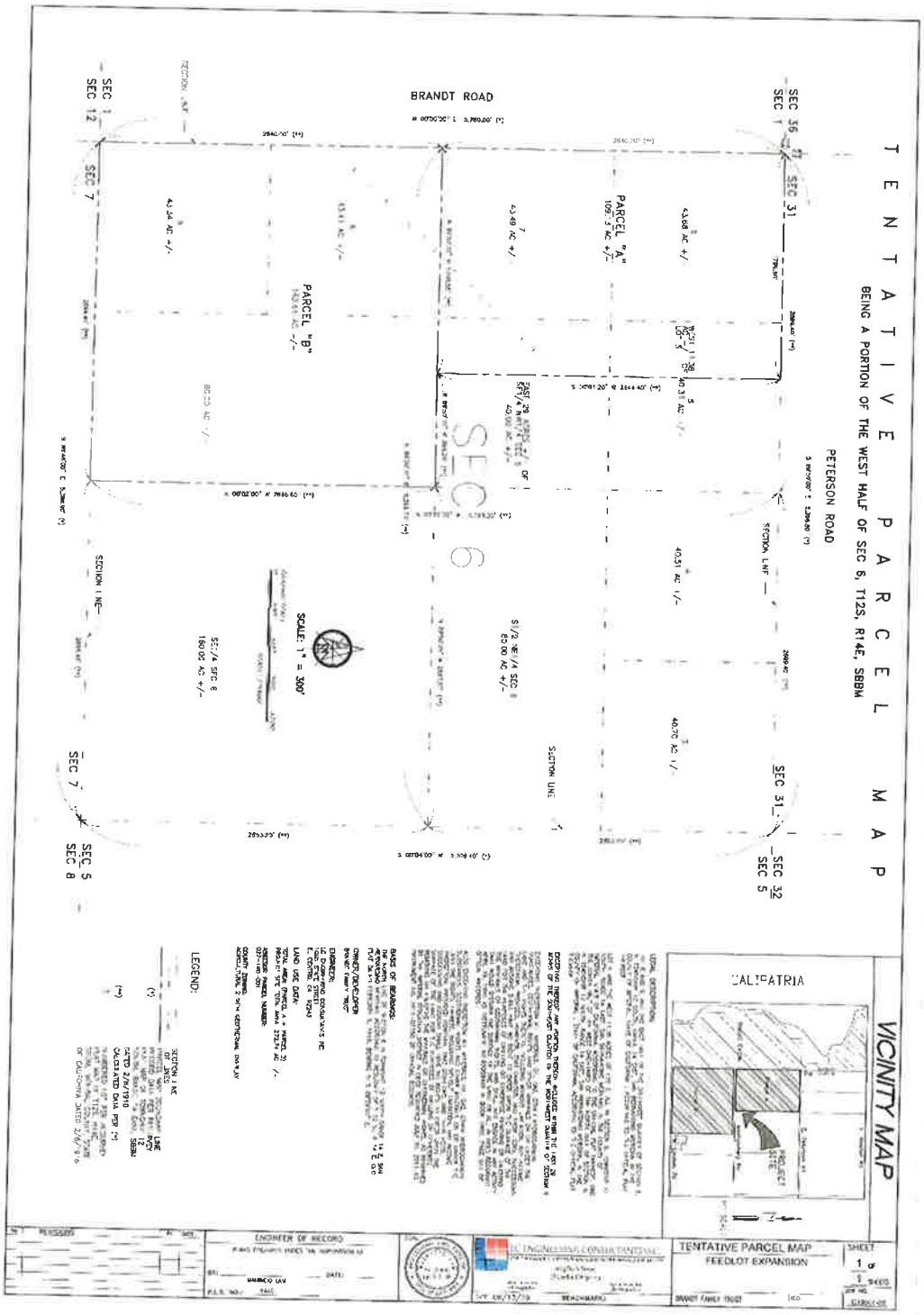


Exhibit "B"
Tentative Parcel Map



EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒

a) The proposed project is not located near any scenic vista or scenic highway, and would not appear to have a substantial adverse effect; therefore, no impacts are expected.

Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

b) The proposed project would not appear to substantially damage a scenic resource e.g. trees, rock outcroppings, and historic buildings within a state scenic highway; therefore, no impacts are expected.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (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? ☐ ☐ ☐ ☒

c) The proposed project site is within a non-urbanized area and adjacent to an existing cattle feed yard to the west; therefore the project will not degrade the existing visual character or quality of the site and its surrounding; there is no impact would be expected.

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

d) The proposed project may create a new source of light that may adversely affect day or nighttime views from those traveling on the adjacent Brandt Road; however, there is not a significant impact since there is already the existing large adjacent cattle feedyard to the west of the proposed project site; therefore, less than significant impacts are expected.

II. *AGRICULTURE AND FOREST RESOURCES*

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

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

a) The proposed project is a Zone Change and Parcel map would remain in agriculture use and deemed consistent with the large existing Brandt Cattle Feedyard adjacent to the site; however, less than significant impact would be expected.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒

b) The proposed project will subdivide an existing parcel into two parcels and the northerly portion (Parcel A) will change from the existing A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone) to the A3 (Heavy Agriculture) Zone and is not within a Williamson Act land contract; therefore, there is no impact.

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒

c) The proposed project is a Zone Change and Parcel Map and the site is not located within a forest or forest land or zoned timberland; therefore, there is no impact.

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

d) The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use; therefore, there is no impact.

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

e) The proposed project is to subdivide the parcel into two parcels and change the currently farmed land to an A3 (Heavy Agriculture) land use and will not result in a conversion of forest land to non-forest use; therefore there is no impact.

III. *AIR QUALITY*

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

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

a) The proposed project is not expected to conflict with or obstruct implementation of the applicable Imperial County air quality plan and the applicants will need to update their Imperial County Air Pollution Control District (ICAPCD) permits for the expanded cattle feedyard based on the ICAPCD requirements. The applicant currently has Permits for the existing operation; however, the expansion will trigger a modification to the Best Management Practices which will contribute to the reduction to the revised mitigation plan and PM10 Plan. With the adherence to the revised mitigation plan and PM plan, as well as Rule 207 and Regulation VIII, impacts would be maintained at a level less than significant.

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

b) The proposed project entails a Zone Change and Parcel Map will not result in a cumulative consideration 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 there are no other feedlots located within a 2 mile radius. As mentioned in item a) above, the applicant will be required to modify their existing Permit with ICAPCD. Adherence to the revised plans would maintain the impacts to a level less than significant.

c)	Expose sensitive receptors to substantial pollutants concentrations?	☐	☐	☒	☐

c) The proposed project is not expected to expose sensitive receptors to substantial pollutants concentrations that are not already existing due to the existing large adjacent Brandt Cattle feedyard to the west; however, with the adherence to mitigation plan and PM Plan and Regulation VIII, impacts would be expect to be maintained at a level less than significant.

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

d) The project proposed will not create objectionable odors affecting a substantial number of people

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

and there is already a large Brandt Cattle Feedyard adjacent to the proposed site; as explained in items a) above, adherence to mitigation pan and PM Plan and Regulation VIII would maintain a less than significant impact would be expected.

IV. *BIOLOGICAL RESOURCES* *Would the project:*

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

a) The proposed project site is located within disturbed agriculture farmland and is not expected to have a substantial adverse effect, either directly or indirectly through habitat modifications, or any species identified as a candidate sensitive, or special status species in local/regional plans, policies or regulations by the CDF&W or UCF&WS. A Burrowing Owl Survey will be performed at least fourteen (14) days prior to any ground disturbance of the site with applicable mitigation measures implemented for any burrowing owls found in the vicinity; therefore, there is a less than significant impact with the following mitigation measures implemented:

Mitigation Measure:

Burrowing Owls

Burrowing owls have been observed in the active agricultural fields in the area. The following measures, as needed and as applicable, will avoid, minimize, or mitigate potential impacts to Burrowing Owls during construction activities:

a) Initial grading of the agricultural fields project footprint should take place between September 1 and January 31 to avoid impacts to any breeding burrowing owls;

b) During non-nesting season (September through January) a distance of 160 feet shall be maintained between active burrows and construction activities. A qualified biologist may also employ the technique of sheltering in place (using hay bales to shelter the burrow from construction activities). If this technique is employed, the sheltered area shall be monitored weekly by a qualified biologist;

c) If construction is to begin during the breeding season, the following measures (Measure 4 below) shall be implemented prior to February 1 to discourage the nesting of the burrowing owls within the area of impact. As construction continues, any area where owls are sighted shall be subject to frequent surveys by the qualified biologist for burrows before the breeding season begins, so that owls can be properly relocated before nesting occurs;

d) Within 14 days prior to initiation of construction, pre-construction clearance surveys for this species shall be conducted by qualified and agency-approved biologists to determine the presence or absence of this species within the construction area. This is necessary, as the Burrowing Owls may not use the same burrow every year; therefore, numbers and locations of Burrowing Owl burrows at the time of construction may differ from the data collected during previous focused surveys. The proposed construction area shall be clearly demarcated in the field by the project engineers and biologist prior to the commencement of the pre-construction clearance survey. The surveys shall follow the protocols provided in the *Burrowing Owl Survey Protocol and Mitigation Guidelines;*

e) If active burrows are present within the project footprint, the following mitigation measures shall be implemented. Passive relocation methods are to be used by the biological monitors to move the Burrowing Owl(s) out of the impact zone. Passive relocation shall only be done in the non-breeding season in accordance with the guidelines found in the Imperial Irrigation District Artificial Burrow Installation Manual. This includes covering or excavating all burrows and installing one-way doors into occupied burrows. This will allow any animals

inside to leave the burrow, but will exclude any animals from re-entering the burrow. A period of at least one week is required after the relocation effort to allow the birds to leave the impacted area before construction of the area can begin. The burrows shall then be excavated and filled in to prevent their reuse. The destruction of the active burrows on-site requires construction of new burrows at a mitigation ratio of 2:1 at least 50 meters from the impacted area and must be constructed as part of the above-described relocation efforts. The construction of new burrows will take place within open areas such as detention basins; and,

f) As the project construction schedule and details are finalized, an approved biologist shall prepare a Burrowing Owl Mitigation and Monitoring Plan that will detail the approved, site-specific methodology proposed to minimize and mitigate impacts to this species. Passive relocation, destruction of burrows, construction of artificial burrows, and Forage Habitat Plan shall only be completed upon prior approval by and in cooperation with the CDFW. The Mitigation and Monitoring Plan shall include success criteria, remedial measures, and an annual report to CDFW and shall be funded by the Permittee to ensure long-term management and monitoring of the protected lands.

Temporary Construction Suspension.

If a Designated Biological Monitor observes the following species foraging within the project site, or in adjacent agricultural fields, construction shall cease until they disperse, e.g. Mountain Plover, Long Billed Curlew, Short Billed Dowitcher, Horned Lark, and Loggerhead Shrike.

Best Management Practices (BMPs)

The following BMPs and mitigation measures shall be implemented during construction to reduce impacts, apply to the entire project site and are intended to reduce impacts to special-status species and habitats.

a) A construction personnel environmental awareness training shall be established and implemented prior to construction to educate the construction personnel on special status species with a medium to high potential to occur in the area. The worker environmental awareness training shall be conducted concurrently with Burrowing Owl training. The training shall include: (1) species description; (2) biology; (3) regulations (CDFW/USFWS); and, (4) contact information and SOP for when a special-status species is identified on-site by construction personnel. All construction personnel shall have access to this information in a printed form (e.g. brochure or flyer posted in construction trailers, informational wallet card distributed to construction personnel or other form).
b) Construction equipment and associated activities shall be limited to the project routes in and out of site;
c) All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in solid, closed containers and removed at the end of each working day from the entire construction site;
d) Cleaning of construction vehicles and equipment prior to entering the project site (e.g. removal of seeds, sticks and other vegetation parts) to prevent the introduction of invasive species onto the project site shall be conducted;
e) All fueling of construction vehicles and site shall be within designated areas and using appropriate protection measures;
f) Nighttime construction shall be minimized to the maximum extent feasible; and,
g) All construction equipment and vehicles shall be turned off when not in use to minimize ambient noise produced by the Project.

b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of	☐	☐	☐	☒

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

Fish and Wildlife or U.S. Fish and Wildlife Service?

b) The proposed project site is farmland and will not 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 CDF&W or the USF&WS. Therefore, no impacts are anticipated.

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

c) The proposed project will not cause a substantial adverse effect on state or federal protected wetlands as defined in the Clean Water Act, e.g. marsh, vernal pool, coastal, through direct removal, filing, hydrological interruptions or other means. Therefore, no impacts are expected.

d) Interfere substantially with the movement of any 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? ☐ ☐ ☐ ☒

d) The proposed project site would not substantially interfere with the movement of any residential or migratory fish or wildlife species or with established resident or migratory wildlife, corridors or impede the use of native wildlife nursery sites and is not located within any such resources as identified within the Imperial County General Plan Conservation and Open Space Element; therefore, no impact are anticipated.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

e) The proposed project is not expected to conflict with any local policy or ordinances protecting biological resources, such as tree preservation policy or ordinance. Therefore, no impacts are anticipated.

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

f) The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; therefore, no impacts are expected.

V. *CULTURAL RESOURCES Would the project:*

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

a) The proposed project area has been historically used for farming for many years and is not located on a historical resource. Therefore, no impacts are expected.

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

b) As mentioned under item a) above, the proposed project site has been historically used for farming and is not located within an archeological sensitive area; therefore, no impacts are expected.

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

c) As mentioned under item a) above, the proposed project site has been historically used for farming and is not expected to result in the disturbance of any human remains, including those interred outside of dedicated cemeteries. Therefore, no impacts are expected.

VI. *ENERGY Would the project:*

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

a) The proposed project is not expected to result in potentially significant environment impact due to wasteful, inefficient, or unnecessary consumption of energy resource, either during construction or operation. Therefore, no impact are expected.

b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

b) The proposed project does not appear to conflict with or obstruct a state or local plan for renewal energy or energy efficiency. Therefore, no impacts are expected.

VII. *GEOLOGY AND SOILS Would the project:*

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

a) The proposed project will not expose people to potential substantial impacts including loss, injury or death involving following effects; therefore, no impacts are expected.

1)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☐	☒

1) According to the State of California's, Alquist-Priolo Earthquake Fault Zone Maps, Revised January 1, 1990, the proposed project site is not located in a Special Studies boundary, therefore no impacts are expected.

2)	Strong Seismic ground shaking?	☐	☐	☐	☒

2) The proposed project would not result in strong seismic ground shaking, therefore no impacts are expected.

3)	Seismic-related ground failure, including liquefaction and seiche/tsunami?	☐	☐	☐	☒

3) The proposed project site is not located near a body of water for a seich to result, and liquefaction is not likely to develop; therefore no impacts are expected.

4)	Landslides?	☐	☐	☐	☒

4) The proposed project site lies within a generally flat topography and therefore will be directly or indirectly effected by a landslide. Therefore no impacts are anticipated.

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

b) The proposed project site is not located within an erosion susceptible area according to the Imperial County, Seismic and Public Safety Element, Figure 3; therefore, no impacts are expected.

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

c) The proposed project site is not located on a geological unit or soil that is unstable or would become unstable due to the expansion of the existing facility therefore, no impacts are expected.

d)	Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life	☐	☐	☐	☒

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

or property?

d) The proposed project site is not characterized by any expansive soils that would be considered environmentally significant. Potential impact deriving from expansive soils are considered negligible. Therefore, no impacts are expected.

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

e) The proposed project site is currently farmed property and the additional cattle feedyard would not impact any wastewater disposal system; therefore no impact are expected.

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

f) The proposed project has been historically used for farming and is not expected to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, no impacts are expected.

VIII. *GREENHOUSE GAS EMISSION Would the project:*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ☐ ☐ ☐ ☒

a) The proposed project does not proposed to generate greenhouse gas emissions other than the nature future emissions from the additional cattle brought to the site; therefore, no impacts are expected.

b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☐ ☒

b) The proposed project does not anticipate to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, no impacts are expected.

IX. *HAZARDS AND HAZARDOUS MATERIALS Would the project:*

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

a) The proposed project would not create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials; therefore, no impacts are expected.

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

b) The proposed project would not create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment; therefore, no impacts are expected.

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

c) The proposed project site is not within ¼ mile of a school and would not pose a risk to school facilities, therefore, no impact is expected.

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d)	Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

d) The proposed project site is not located on a site included on a list of hazardous material sites; therefore, no impact is expected.

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

e) The proposed project site is not located within an Airport Land Use Compatibility Area and would appear not to have any significant impact to people residing or working in the project area. Therefore, no impact is expected.

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

f) The proposed project site does not appear to interfere with an adopted emergency response plan or emergency evacuation plan, therefore, no impact is expected.

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

g) The proposed project site is not located in an area susceptible to wildland fires, therefore, no impact is expected.

X. *HYDROLOGY AND WATER QUALITY* ***Would the project:***

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

a) The proposed project is located adjacent to an existing cattle feedyard, existing agriculture fields and the Calipatria Wastewater ponds and would not violate any water quality standards or waste discharge requirement and therefore, there is no impact to waste discharge requirement with the obtaining of applicable RWQCB waste discharge orders.

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

b) The proposed project will not affect or deplete groundwater supplies or interfere with groundwater recharge. Therefore, no impacts are expected.

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

c) The proposed project would not substantially alter the existing drainage patterns, nor result in substantial erosion or siltation on- or off-site; therefore, no impacts are expected.

(i)	result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒

(i) As mentioned under Geology & Soils b) above, the project is not located within an erosion susceptible area. Therefore, no impacts are anticipated.

(ii)	substantially increase the rate or amount of surface runoff in a manner which would result in	☐	☐	☐	☒

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

flooding on- or offsite;

(ii) The proposed project (zone change and parcel map for 30,000 additional cattle) can contribute to runoff water, but is not expected to exceed the capacity of the existing IID stormwater drainage system; therefore, no impact would be expected.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; ☐ ☐ ☒ ☐

(iii) The Proposed project is not expected to create or contribute runoff water which would exceed the capacity of existing stormwater drainage system or provide substantial additional source of polluted runoff. Imperial County Public Works will required a Drainage/Grading Plan Study. Through the implementation of the plan, the impacts would be reduced to a level less than significant.

(iv) impede or redirect flood flows? ☐ ☐ ☐ ☒

(iv) The proposed project (zone change and parcel map) would not impede or redirect flood flow; therefore, no impacts are expected.

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

d) The western portion of the proposed project site is located within Zone A per Federal Emergency Management Agency (FEMA) Map (Panel No. 06025C0725C); however, the project is located adjacent to the existing feedlot to the west and north. The Department of Public Works will require a Drainage/Grading Plan/Study. Through the Implementation of the plan and employment of appropriate Best Management Practices (BMP's), any impacts would be reduced to a level less than significant.

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

e) The proposed project does not appear to conflict or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. No impacts are expected.

XI. *LAND USE AND PLANNING Would the project:*

a) Physically divide an established community? ☐ ☐ ☐ ☒

a) The proposed project will not physically divide an established community; therefore, no impact is expected.

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

b) The proposed project would not conflict with the County's General Plan or Land Use Ordinance with the approval of the Zone Change and Parcel Map since the agriculture site would be designated for an expanded cattleyard that would be a permitted use under the proposed A3 (Heavy Agriculture) zoning; therefore, no impacts are expected.

XII. *MINERAL RESOURCES Would the project:*

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

a) The proposed project will not remove mineral resources on-site; therefore, no impact is expected.

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

b) The proposed project will not result in the loss of a locally-important mineral resources recovery site as identified in the Imperial County General Plan, Conservation and Open Space Element – Mining Resources; therefore, no impact is expected.

XIII. *NOISE* *Would the project result in:*

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

a) The proposed project will include construction noise, noise from additional cattle and on-going operation, but is not expected to exceed the County's noise regulations; therefore, less than significant impacts are expected.

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

b) There will be vibrations and goundborne noise due to the construction of pens, increased number of cattle truck(s), hauling cattle to and from the expanded feedyard; however, the levels would be considered less than significant due to the proximity of the large adjacent Brandt Cattle Feedyard.

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

c) The proposed project is not located within the vicinity of a private airstrip or an airport land use plan or a public airport or public use airport which would exposed people residing or working in the project with excess noise level. Therefore, no impacts are expected.

XIV. *POPULATION AND HOUSING* *Would the project:*

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

a) The proposed project is a non-residential project, and it is not expected to directly or indirectly induce the local population or infrastructure substantially for new homes and/or businesses; therefore, no impacts are expected.

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

b) The proposed project is not expected to displace substantial numbers of exiting housing, necessitating the construction of replacement housing elsewhere; therefore, no impact is expected.

XV. *PUBLIC SERVICES*

a)	Would the project result in substantial adverse physical	☐	☐	☐	☒

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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

(a) The proposed project does not proposed any development affecting governmental facilities. There is no impacts.

1) Fire Protection? ☐ ☐ ☐ ☒

1) The proposed project will not result in substantial adverse impact to fire protection. Therefore, no impacts are expected.

2) Police Protection? ☐ ☐ ☐ ☒

2) The proposed project will not result in substantial adverse impact to police protection. Therefore, no impacts are expected.

3) Schools? ☐ ☐ ☐ ☒

3) The proposed project is not expected to result in impacts to schools, therefore, no impacts are expected.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed project will not result in impacts to parks; therefore, no impacts are expected.

5) Other Public Facilities? ☐ ☐ ☐ ☒

5) The proposed project is not expected to result in substantial impacts to other public facilities; therefore, no impacts are expected.

XVI. *RECREATION*

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

a) The proposed project is not expected to impact regional or local recreational facilities, nor would farmdit create substantial physical deterioration of the facilities; therefore, no impacts are expected.

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

b) The proposed project does not include the construction of recreational facilities, therefore, there is no impact.

XVII. *TRANSPORTATION* ***Would the project:***

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

a) The proposed project will result in an increase in traffic to and from the project site on local roads. The Imperial County Public Works Department has reviewed the proposed project and recommend that the Developer furnish a traffic study for the proposed project, with the developer responsible (if required) any/all traffic study impact measures with the traffic study, including but not limited to road improvements and fair share cost. However, a less than significant impact would be expected.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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

b) The proposed project does not appear to conflict or be inconsistent with CEQA Guidelines, section 15064.3(b). There are no transit stops within a one-half mile of the proposed project site; however, any road improvement shall be made to the Imperial County Public Works Department requirements. Less that significant impacts are anticipated.

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

c) The proposed project does not appear to substantially increase hazards due to design features or incompatible uses. Additionally, Imperial County Public Works Department will require an encroachment permit which will address the ingress/egress for the project site. Therefore, any impact would appear to be less than significant.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

d) The proposed project would not result in inadequate emergency access; therefore, no impact is expected.

XVIII. *TRIBAL CULTURAL RESOURCES*

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

a) The project would not cause an adverse change in the significance of a tribal cultural resource, therefore, any impacts are considered less than significant. Based on Figure 6 Known Areas of Native American Sensitivity of the Conservation and Open Space Element of the Imperial County General Plan, the project site is not located with any sensitive area. Additionally, a letter was sent to the Quechan Indian Tribe and on August 20, 2018 and no response has been received.

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or ☐ ☐ ☐ ☒

(i) The proposed project had been historically farmed and would not be listed or eligible for listing in the California Register of Historical Resources. Therefore, no impacts are expected.

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

(ii) As mentioned in a) above, a letter was sent to the Quechan Indian Tribe and on May 21, 2019 (for the Zone Change and Parcel Map) the sent an email stating they have no comments. However, no letter has been received.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

XIX. *UTILITIES AND SERVICE SYSTEMS* *Would the project:*

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

a) The proposed project is not expected to require or result in the relocation or construction of new or expand water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facility. Therefore, no impacts are expected.

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

b) The proposed project is not expected to exceed the capacity of the current services provider and no new or expanded entitlements are needed. Therefore, no impacts are anticipated.

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

c) The proposed project is located within existing farmland and does not propose to impact a wastewater treatment provider; however, if the increase in total of employees result in the additional demands to the existing septic system (at the existing office), a modification to the existing system permit will be required to stay within state code. Impacts would appear to be less than significant.

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

d) The proposed project would appear to generate during construction and operational phases; however, applicant/contractor would be required to contract with an approved solid waste hauler for waste disposal. Therefore, a less that significant impact would be expected.

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

e) The proposed project is located within existing farmland, and is not expected to generate any solid waste other than cattle manure; therefore, no impact. The applicant shall comply with federal, state and local statues and regulations related to solid waste. Therefore, less than significant impacts would be expected.

XX. *WILDFIRE*

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

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

a) The proposed project is not expected to substantially impair an adopted emergency response plan or emergency evacuation plan. No impacts are anticipated.

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

b) The proposed project is in a flat topographical area and not within a wildfire area. Therefore, no impacts are anticipated.

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

c) The project is not located within a very high fire hazard severity zone and will not require infrastructure that may exacerbate fire risk. Therefore, no impacts are anticipated.

d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

d) The project area is in a flat topographical area and would not expose people or structures to risk significant risks due to flooding or landslide as a result of runoff, post-fire slope instability or drainage changes. Therefore, no impacts are anticipated.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a)	**Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?**	☐	☐	☐	☐
b)	**Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**	☐	☐	☐	☐
c)	**Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☐	☐	☐

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Joe Hernandez, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Imperial Irrigation District
- Regional Water Quality Control Board

(Written or oral comments received on the checklist prior to circulation)

V. REFERENCES

1. "County of Imperial General Plan EIR", prepared by Brian F. Mooney & Associates in 1993; and, as Amended by County in 1996, 1998, 2001, 2003, 2006 & 2008, 2015, 2016.
2. County of Imperial Land Use Ordinance
3. Zone Change project application and project description
4. Williamson Act map created in 2012 by the Imperial County Planning & Development Service Department for the Imperial County Board of Supervisors; Order #10a
5. Imperial County Air Pollution Control District's Air Quality Handbook
6. State of California, Aquist-Priolo Earthquake Fault Zone Maps, Revised January 1, 1980, Special Studies Map
7. U.S. Department of Homeland Security, Federal Emergency Management Flood Insurance Rate Maps, effected September 26, 2008.
8. Seismic and Public Safety Element of the Imperial County General Plan
9. Conservation and Open Space Element of the Imperial County General Plan
10. Noise Element of the Imperial County General Plan
11. County of Imperial Airport Land Use Compatibility Plan

VI. MITIGATED NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Zone Change #19-0002 and Parcel Map #02483

Project Applicant: Brandt Family Trust

Project Location: The proposed project site is located at 7015 Brandt Road, Calipatria, CA, located within a portion of Section 6, Township 12 South, Range 14 East, SBB&M. The ±266.34 acre parcel is located on Assessor Parcel Number 022-160-001-000.

Description of Project: The applicant has submitted Zone Change #19-0002 proposing to rezone Assessor Parcel Number 022-160-001-000 from A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone) to A3 (Heavy Agriculture) to expand the existing Brandt Cattle Feedlot to the east to add 30,000 cattle. Additionally, Parcel Map #02483 has been submitted proposing to subdivide this parcel as part of the expansion. Proposed Parcel A (±107 acres) will cover the feedlot expansion and Proposed Parcel B (±158 acres) will remain in Farming.

The Applicant proposed to change the zoning on the parcel from A2/G&RG (General Agriculture/Rural/Geothermal Overlay Zone) to the A3 (Heavy Agriculture) Zone that allows for animal "stockyards", i.e. a cattle feedyard.

VII. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environmental and is proposing this Negative Declaration based upon the following findings:

☐ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

S:\APN\022\160\001\ZC19-0002\EEC Pkg\Initial Study (ZC19-0002).docx

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

May 24, 2019

Jim Minnick, Director
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: Zone Change 19-0002 Application for the future expansion of the Brandt Cattle Feed Yard

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review and comment on Zone Change (ZC) 19-0002 (Project) application submitted by Brandt Company, Inc. The intent of the Project is to allow for the future expansion, on an additional 266.34 acres net east of the Brandt Co. Feed Yard located at 7015 Brandt Rd., Calipatria, CA 92233. The expansion would include the construction of additional pens for the addition of approximately 20,000 head of cattle, three to four additional staff, one extra truck for the daily feeding of cattle, and one cattle truck per day to cover the incoming and outgoing cattle.

After review, the Air District is requesting a preliminary Air Quality Analysis that addresses any potential increases in the non-attainment pollutants, PM_{10}, $PM_{2.5}$ and Ozone and its precursors, i.e. Volatile Organic Compounds (VOC's) resulting from the proposed expansion. The analysis should conform to the California Environmental Quality Act (CEQA) and the Imperial County CEQA Air Quality Handbook requirements discussing the construction, operational and the cumulative effects of the proposed expansion.

As a reminder, the Air District's Rules & Regulations are available via web at www.co.imperial.ca.us under Air Pollution. Should you have any questions or concerns please feel free to contact the Air District (442) 265-1800.

Respectfully,

Curtis Blondell

Curtis Blondell
APC Environmental Coordinator

Reviewed by Monica Soucier,
APC Division Manager

Imperial County Planning & Development Services

Planning / Building /

RECEIVED

MAY 22 2019

IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

Jim Minnick
DIRECTOR

May 8, 2019

REQUEST FOR REVIEW AND COMMENTS

The attached project and materials are being sent to you for your review and as an early notification that ne fo ng project is being requested and being processed by the Imperial County's Planning & Development Services Department. Please rev- aw th posed project based on your agency/department's area of interest, expertise, and/or jurisdiction.

To: County Agencies	State Agencies/Other	Cities/Other
☐ Board of Supervisors-Ryan Kelley	☐ Caltrans District 11 - Jacob Armstrong	☐ City of El Centro – Norma Villicana
☐ County Executive Office – Andy Horne	☐ Air Resource Board – Richard W. Corey	☐ City of Calexico – Mark Vasquez
☐ County Counsel – Michael Rood	☐ CA RWQC Board – Robert Perdue	☐ City of Imperial – Jorge Galvan
☐ APCD – Brad Poiriez, Monica Soucier	☐ Torres-Martinez Desert Cahuilla Indians	☐ City of Brawley – Gordon Gaste
☐ Public Works – William Brunet, P.E.	☐ South Coast Information Center-Jaime Lennox	☐ City of Calipatria – Rom Medina
☐ CHP – Karl Clark	☐ US Fish & Wildlife-Christian Schoneman	☐ City of Holtville Fire Dept.- Alex Silva
☐ Ag. Commissioner – Connie Valenzuela, Phyllis Cason	☐ CA Historic Preservation – Carol Roland	☐ City of Holtville – Public Works
☐ IC Fire/OES Office – Tony Rouhotas	☐ CUPA – Roger Vintze	☐ IID Water Dept.
☐ IC Sheriff's Office – Ray Loera	☐ CA Dept. Conservation – John Lowrie	☐ IID Executive Office
☐ EHS Office – Jeff Lamoure	☐ CHP (Imperial Office) –	☐ IID Environmental – Donald Vargas.
☐ IC Assessor's Office – Robert Menvielle	☐ CA Native American Heritage–Katy Sanchez	☐ March Air Force Reserve Base
☐ IV Grower's Assoc.	☐ Fort Yuma Quechan Indian Tribe-Keeny Escalanti	☐ El Centro NAF – Capt. William Doster
☐ IV Air Applicators - Byron Nelson	☐ BUH8D - Dr. Hasmik Danielian	☐ Marines Station Yuma – Paula Backs
☐ Cocopah Indian Tribe – Sherry Cordova	☐ CUSD - Douglas Kline	☐ Dept. US Fish & Wildlife

From:	Case Planner Joe Hernandez, Planner IV (442) 265-1736 Ext.1748, E-mail imperialcountyplanning@gmail.com
Project ID:	Zone Change #19-0002 (from A2RG/General Agriculture/Rural/Geothermal Overlay to A-3/Heavy Agriculture)
Project Location:	7015 Brandt Road; Calipatria, CA. Expansion area lies east side of Brandt Road between Lindsay Road and Peterson Road.
Project Description:	The applicants propose to expand the existing Brandt Cattle Feedlot to the east on Assessor's Parcel Number 022-160-001-000 on approximately 266.34 acres (net) to add 20,000 cattle. According to the attached application, three to four additional staff are proposed to be hired and one extra truck for the daily feeding of the cattle and would also require one cattle truck per day to cover the incoming and outgoing cattle.
Applicants:	Brandt Family Trust, etal

Your written comments, recommendations, or conditions are requested by the deadline below so that they can be reviewed for appropriateness by the Director of Planning & Development Services and incorporated as part of project consideration. Please submit your response to the Case Planner. Jim Minnick, Director, Thank You!

Comments due by: May 24, 2019 **EEC Meeting: TBD**

COMMENTS: *(attach a separate sheet if necessary)* (if no comments, please state below and mail, fax, or e-mail this sheet to Case Planner)

No comments.

Name: [illegible] Signature: [signature] Title: EHS

Date: 5-22-19 Telephone No.: x6491 E-mail: [illegible]@co.imperial.ca.us

G:\JJBS\APN\022\160\CO\ZC19-0002\Comment for Request (04262019).docx

COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (442) 265-1818
Fax: (442) 265-1858

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https://twitter.com/CountyDpw/

Public Works works for the Public

ICDPW

September 30, 2019

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Attention: Joe Hernandez, Planner IV

SUBJECT: ZC 19-0002 Brandt Family Trust.
Located on 7015 Brandt Road, Calipatria, CA
APN 054-250-012/014

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on May 8, 2019 for the above mentioned project. The applicant proposes to expand the existing Brandt Cattle Feedlot to the east on Assessor's Parcel Number 022-160-001-000 on approximately 266.34 acres(net) to add 20,000 cattle.

Department staff has reviewed the package information and the following comments are provided for the applicant use:

1. Any activity and/or work within Imperial County Right-of-Way shall be completed under a permit issued by this Department (encroachment permit) as per Chapter 12.12 - Excavations on or Near a Public Road of the Imperial County Ordinance.

   Any activity and/or work may include, but not be limited to, the installation of temporary stabilized construction entrances, access driveways, road improvements, temporary traffic control devices, etc.

2. An encroachment permit shall be secured from the Department of Public Works for any unauthorized existing driveway(s) to access the property through surrounding County Roads.

3. Per Section 12.10.030 - Building Permits of Imperial County Ordinance:

   a. No building permit for any structure or building or major addition to a building or structure shall be issued until the improvements required by Section 12.10.010 of this chapter have been installed. In addition, no building permit shall be issued until there has been compliance with Chapter 12.12 of this title and the requirement that an encroachment permit be obtained.

4. Corner record is required to be filed with the county surveyor prior to construction for monuments:

8771. (b) When monuments exist that control the location of subdivisions, tracts, boundaries, roads, streets, or highways, or provide horizontal or vertical survey control, the monuments shall be located and referenced by or under the direction of a licensed land surveyor or licensed civil engineer legally authorized to practice land surveying, prior to the time when any streets, highways, other rights-of-way, or easements are improved, constructed, reconstructed, maintained, resurfaced, or relocated, and a corner record or record of survey of the references shall be filed with the county surveyor.

5. A second corner record is required to be filed with the county surveyor for monuments:

   8771. (c) A permanent monument shall be reset in the surface of the new construction or a witness monument or monuments set to perpetuate the location if any monument could be destroyed, damaged, covered, disturbed, or otherwise obliterated, and a corner record or record of survey shall be filed with the county surveyor prior to the recording of a certificate of completion for the project. Sufficient controlling monuments shall be retained or replaced in their original positions to enable property, right-of-way and easement lines, property corners, and subdivision and tract boundaries to be reestablished without devious surveys necessarily originating on monuments differing from those that currently control the area.

6. Prior to the issuance of grading and building permits, the Developer shall complete the installation of temporary stabilized construction entrance.

7. Prior to issuance of final certificate of occupancy, the Developer shall be responsible for repairing any damage caused to County roads during construction as determined by the Imperial County Road Commissioner.

8. Developer shall furnish a Drainage and Grading Plan to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. Grading plans shall be prepared per County of Imperial Department of Public Works Engineering Design Guidelines Manual. Grading plan shall be submitted to the Department of Public Works for review and approval. The Developer shall implement the approved plan. Employment of the appropriate Best Management Practices (BMP's) shall be included. (Per Imperial County Code of Ordinances, Chapter 12.10.020 B).

9. Primary access driveways along Brandt Road to each parcel shall be constructed of asphalt concrete pavement per County of Imperial Department of Public Works Engineering Design Guidelines Manual – Detail of Commercial Driveway to Connection Rural Road Connection – Dwg. No. 410B

10. Secondary emergency access driveway along Brandt Road to each parcel shall be constructed of asphalt concrete pavement.

11. Developer shall furnish a Traffic Study and shall submit to the Department of Public Works.

12. Developer will be responsible if required, any/all traffic study impact measure within the traffic study, including but not limited to, road improvements and fair share costs.

13. Brandt Road is classified as Minor Collector – Local Collector, two (2) lanes, requiring seventy feet (70) of right of way, being thirty five (35) feet from existing centerline. It is required that sufficient right of way be provided to meet this road classification. **As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**

14. Lindsey Road is classified as Minor Collector – Local Collector, two (2) lanes, requiring seventy feet (70) of right of way, being thirty five (35) feet from existing centerline. It is required that sufficient right of way be provided to meet this road classification. **As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**

INFORMATIVE:

The following items are for informational purposes only. The applicant is responsible to determine if the enclosed items affect the subject project.

- All solid and hazardous waste shall be disposed of in approved solid waste disposal sites in accordance with existing County, State and Federal regulations (Per Imperial County Code of Ordinances, Chapter 8.72).

- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior county approval of onsite grading plan (40 CFR 122.28).

- As this project proceeds through the planning and the approval process, additional comments and/or requirements may apply as more information is received.

- A Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and/or large vehicles which impose greater than legal loads on riding surfaces, including bridges. (Per Imperial County Code of Ordinances, Chapter 10.12 – Overweight Vehicles and Loads)

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

By:

John A. Gay, PE
Director of Public Works

CY/ag

IID

www.iid.com

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May 24, 2019

Mr. Joe Hernandez
Planner IV
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Zone Change Request No. 19-0002 (Brandt Cattle Feedlot Expansion)

Dear Mr. Hernandez:

On May 8, 2019, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Zone Change request no. 19-0002. The applicant, Brandt Family Trust, is requesting a zone change for the expansion of their existing feedlot located on the east side of Brandt Road between Lindsay Road and Peterson Road in Calipatria, CA (APN 022-160-001-000) to accommodate an additional 20,000 head of cattle.

The IID has reviewed the information provided and has the following comments:

1. IID facilities that could be impacted by the expansion include the G Lateral, I Drain, and H Drain.

2. An IID planning review will be required for the project in accordance with IID Water Department developer guidelines. The district's Developer Project Guide is available at http://www.iid.com/home/showdocument?id=2328. Draft designs should be submitted to the IID Water Department Engineering Services prior to their finalization to identify impacts to IID facilities; applicant should explain how the proposed project will manage storm water runoff. For additional information regarding the planning review contact the engineering services at (760) 339-9265.

3. IID Water Department will require a storm water retention basin in accordance with Imperial County requisites. No offsite drainage discharge is allowed into IID drains from the feed yard or feed yard expansion. This includes existing tail water pipe(s) and existing tile lines.

4. Modifications to IID canals and drains may have project level environmental impacts that should be analyzed on a site-specific basis.

5. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or

encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

6. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.

7. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to canals, drains, electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the applicant.**

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Jamie Asbury – Deputy Manager, Energy Dept., Operations
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service
Vance Taylor – Asst. General Counsel
Robert Laurie – Asst. General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes – Supervisor, Real Estate
Jessica Lovecchio – Environmental Project Mgr. Sr., Water Dept.

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September 23, 2019

Mr. Joe Hernandez
Planner IV
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Zone Change Request No. 19-0002 (Brandt Cattle Feedlot Expansion) – Revised Amount of Cattle

Dear Mr. Hernandez:

On September 20, 2019, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a revised request for agency comments on Zone Change request no. 19-0002. The applicant, Brandt Family Trust, who is requesting a zone change for the expansion of the existing feedlot located on the east side of Brandt Road between Lindsay Road and Peterson Road in Calipatria, CA, to accommodate an additional amount of cattle, has revised the quantity from 20,000 to 30,000 head of cattle.

The IID has reviewed the revised documents and finds that the comments provided in the May 24, 2019 district letters (see attached letters) continue to apply.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

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May 24, 2019

Mr. Joe Hernandez
Planner IV
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Zone Change Request No. 19-0002 (Brandt Cattle Feedlot Expansion)

Dear Mr. Hernandez:

On May 8, 2019, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Zone Change request no. 19-0002. The applicant, Brandt Family Trust, is requesting a zone change for the expansion of their existing feedlot located on the east side of Brandt Road between Lindsay Road and Peterson Road in Calipatria, CA (APN 022-160-001-000) to accommodate an additional 20,000 head of cattle.

The IID has reviewed the information provided and has the following comments:

1. IID facilities that could be impacted by the expansion include the G Lateral, I Drain, and H Drain.

2. An IID planning review will be required for the project in accordance with IID Water Department developer guidelines. The district's Developer Project Guide is available at http://www.iid.com/home/showdocument?id=2328. Draft designs should be submitted to the IID Water Department Engineering Services prior to their finalization to identify impacts to IID facilities; applicant should explain how the proposed project will manage storm water runoff. For additional information regarding the planning review contact the engineering services at (760) 339-9265.

3. IID Water Department will require a storm water retention basin in accordance with Imperial County requisites. No offsite drainage discharge is allowed into IID drains from the feed yard or feed yard expansion. This includes existing tail water pipe(s) and existing tile lines.

4. Modifications to IID canals and drains may have project level environmental impacts that should be analyzed on a site-specific basis.

5. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or

encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

6. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.

7. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to canals, drains, electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the applicant.**

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Enrique B Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Jamie Asbury – Deputy Manager, Energy Dept., Operations
Enrique De Leon – Asst. Mgr., Energy Dept., Distr, Planning, Eng & Customer Service
Vance Taylor – Asst. General Counsel
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May 24, 2019

Mr. Joe Hernandez
Planner IV
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Zone Change Request No. 19-0002 (Brandt Cattle Feedlot Expansion) – Additional Comments

Dear Mr. Hernandez:

In addition to the Imperial Irrigation District's comments submitted to you on this date, please be advised that if and when the applicant intends to modify the feedlot's electrical loads due to the increase of 20,000 head of cattle at the expanded site, the applicant should contact the IID Customer Project Development offices at (760) 482-3426 and speak with Ignacio Romo, Customer Project Development Planner or e-mail Mr. Romo at igromo@iid.com to review the project's scope of work and initiate the electrical service application process. In addition to submitting a formal application for electrical service upgrade (available at the IID website http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit the electrical loads, panel size, voltage, project CAD files (electronic and hard copy), project schedule, estimated in-service date and environmental compliance documentation along with the applicable fees, permits and rights of way and easements pertaining to the provision of electrical service the expanded feedlot. Due to electrical capacity issues, IID may require to perform a circuit study to determine if any circuit upgrades are needed to accommodate the expansion project. The applicant shall be responsible for any and all costs related to upgrading the distribution system as identified by the study, including additional rights of way.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Jamie Asbury – Deputy Manager, Energy Dept., Operations
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service
Vance Taylor – Asst. General Counsel
Robert Laurie – Asst. General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes – Supervisor, Real Estate
Jessica Lovecchio – Environmental Project Mgr Sr., Water Dept.

IX Mitigation Monitoring & Reporting Program (MM&RP)

MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES PURSUANT TO THE ENVIRONMENTAL EVALUATION COMMITTEE
October 10, 2019
Brandt Family Trust
Cattle Feedlot Expansion Project
[ZC #19-0002] (APN 022-160-001-000)
(CEQA – Mitigated Negative Declaration)

Pursuant to the review and recommendations of the Imperial County Environmental Evaluation Committee (EEC) on October 10, 2019, the following Mitigation Measures are hereby proposed for the project:

BIOLOGICAL RESOURCES:

MITIGATION MEASURES:

Burrowing Owls

Burrowing owls have been observed in the active agricultural fields in the area. The following measures, as needed and as applicable, will avoid, minimize, or mitigate potential impacts to Burrowing Owls during construction activities:

a) Initial grading of the agricultural fields project footprint should take place between September 1 and January 31 to avoid impacts to any breeding burrowing owls;

b) During non-nesting season (September through January) a distance of 160 feet shall be maintained between active burrows and construction activities. A qualified biologist may also employ the technique of sheltering in place (using hay bales to shelter the burrow from construction activities). If this technique is employed, the sheltered area shall be monitored weekly by a qualified biologist;

c) If construction is to begin during the breeding season, the following measures (Measure 4 below) shall be implemented prior to February 1 to discourage the nesting of the burrowing owls within the area of impact. As construction continues, any area where owls are sighted shall be subject to frequent surveys by the qualified biologist for burrows before the breeding season begins, so that owls can be properly relocated before nesting occurs;

d) Within 14 days prior to initiation of construction, pre-construction clearance surveys for this species shall be conducted by qualified and agency-approved biologists to determine the presence or absence of this species within the construction area. This is necessary, as the Burrowing Owls may not use the same burrow every year; therefore, numbers and locations of Burrowing Owl burrows at the time of construction may differ from the data collected during previous focused surveys. The proposed construction area shall be clearly demarcated in the field by the project engineers and biologist prior to the commencement of the pre-construction clearance survey. The surveys shall follow the protocols provided in the *Burrowing Owl Survey Protocol and Mitigation Guidelines;*

e) If active burrows are present within the project footprint, the following mitigation measures shall be implemented. Passive relocation methods are to be used by the biological monitors to move the Burrowing Owl(s) out of the impact zone. Passive relocation shall only be done in the non-breeding season in accordance with the guidelines found in the Imperial Irrigation District Artificial Burrow Installation Manual. This includes covering or excavating all burrows and installing one-way doors into occupied burrows. This will allow any animals inside to leave the burrow, but will exclude any animals from re-entering the burrow. A period of at least one week is required after the relocation effort to allow the birds to leave the impacted area before construction of the area can begin. The burrows shall then be excavated and filled in to prevent their reuse. The destruction of the active burrows on-site requires construction of new burrows at a mitigation ratio of 2:1 at least 50 meters

from the impacted area and must be constructed as part of the above-described relocation efforts. The construction of new burrows will take place within open areas such as detention basins; and,

f) As the project construction schedule and details are finalized, an approved biologist shall prepare a Burrowing Owl Mitigation and Monitoring Plan that will detail the approved, site-specific methodology proposed to minimize and mitigate impacts to this species. Passive relocation, destruction of burrows, construction of artificial burrows, and Forage Habitat Plan shall only be completed upon prior approval by and in cooperation with the CDFW. The Mitigation and Monitoring Plan shall include success criteria, remedial measures, and an annual report to CDFW and shall be funded by the Permittee to ensure long-term management and monitoring of the protected lands.

Temporary Construction Suspension.

If a Designated Biological Monitor observes the following species foraging within the project site, or in adjacent agricultural fields, construction shall cease until they disperse, e.g. Mountain Plover, Long Billed Curlew, Short Billed Dowitcher, Horned Lark, and Loggerhead Shrike.

Best Management Practices (BMPs)

The following BMPs and mitigation measures shall be implemented during construction to reduce impacts, apply to the entire project site and are intended to reduce impacts to special-status species and habitats.

a) A construction personnel environmental awareness training shall be established and implemented prior to construction to educate the construction personnel on special status species with a medium to high potential to occur in the area. The worker environmental awareness training shall be conducted concurrently with Burrowing Owl training. The training shall include: (1) species description; (2) biology; (3) regulations (CDFW/USFWS); and, (4) contact information and SOP for when a special-status species is identified on-site by construction personnel. All construction personnel shall have access to this information in a printed form (e.g. brochure or flyer posted in construction trailers, informational wallet card distributed to construction personnel or other form).
b) Construction equipment and associated activities shall be limited to the project routes in and out of site;
c) All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in solid, closed containers and removed at the end of each working day from the entire construction site;
d) Cleaning of construction vehicles and equipment prior to entering the project site (e.g. removal of seeds, sticks and other vegetation parts) to prevent the introduction of invasive species onto the project site shall be conducted;
e) All fueling of construction vehicles and site shall be within designated areas and using appropriate protection measures;
f) Nighttime construction shall be minimized to the maximum extent feasible; and,
g) All construction equipment and vehicles shall be turned off when not in use to minimize ambient noise produced by the Project.

(MONITORING AGENCIES: CA DEPARTMENT OF FISH & WILDLIFE & U.S. FISH & WILDLIFE SERVICES & PLANNING & DEVELOPMENT SERVICES)

APPLICATION PACKAGE

CHANGE OF ZONE

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black & blue) SPACES – Please type or print -

1.	PROPERTY OWNER'S NAME Brandt Family Trust[1]	EMAIL ADDRESS mark@brandtco.net	
2.	MAILING ADDRESS (Street / P O Box, City, State) P.O. Box 118, Brawley, CA	ZIP CODE 92227	PHONE NUMBER 760-353-8110
3.	ENGINEER'S NAME CA. LICENSE NO. DuBose Design Group	EMAIL ADDRESS tom@dubosedesigngroup.com/matthew@dubosedesigngroup.com	
4.	MAILING ADDRESS (Street / P O Box, City, State) 1065 State Street, El Centro, CA	ZIP CODE 92243	PHONE NUMBER 760-353-8110

5.	ASSESSOR'S PARCEL NO. 022-160-001	ZONING (existing) A2R	ZONING (proposed) A3, *A portion of the 266.34 acres
6.	PROPERTY (site) ADDRESS Please see assessor's parcel number		SIZE OF PROPERTY (in acres or square foot) 266.34 acres

7. GENERAL LOCATION (i.e. city, town, cross street)
Intersection of Brandt and Peterson Rd. (South/East of Intersection)

8. LEGAL DESCRIPTION Lots 8 and 9, and the East half of the Southwest quarter of Section 6, in Township 12 South, Range 14 East; Lot 6 and the West 11.38 acres of Lot 5, all in Section 6, Township 12 South, Range 14 East; and the South half of the West one-third of the North half of Section 6, in Township 12 South, Range 14 East, San Bernardino Meridian, in the County of Imperial, State of California

8. DESCRIBE CURRENT USE ON / OF PROPERTY (list and describe in detail)
The Northwest portion of the property contains a solar panel station; the remaining portion of the property is used for farming.

9. PLEASE STATE REASON FOR PROPOSED USE (be specific) A portion of this parcel will be rezoned to allow a feedlot operation. A Parcel Map application will accompany this Zone Change application. Parcel A will be the portion of the property that will receive the Zone Change.

10. DESCRIBE SURROUNDING PROPERTY USES Brandt Company Feedlot exists to the west across Brandt Road; Calipatria domestic wastewater ponds are to the east; farming surrounding the remainder of the property.

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT

Tom E DuBose — Print Name Agent
9/16/2019 — Date
Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. PRELIMINARY TITLE REPORT (6 months or newer)
C. FEE
D. OTHER

APPLICATION RECEIVED BY:	JH	DATE	09/16/19
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required
☐ P W
☐ E H S
☐ A P C D
☐ O E S
☐
☐

ZC # 19-0002

Footnote:
William L. Brandt and Susan L. Brandt, Trustees of the Brandt Family Trust dated September 1, 2009 as to 4/7ths and Eric W. Brandt and Mark J. Brandt as to 3/14ths each.

MINOR SUBDIVISION

I.C. PLANNING & DEVELOPMENT SERVICES DEPT
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1.	PROPERTY OWNER'S NAME Brandt Family Trust [1]	EMAIL ADDRESS	mark@brandtco.net, tom@dubosedesigngroup.com, matthew@dubosedesigngroup.com
2.	MAILING ADDRESS P.O. Box 118, Brawley, CA	ZIP CODE 92227	PHONE NUMBER 760-348-2295
3.	ENGINEER'S NAME / CAL. LICENSE NO. LC Engineering / 55432	EMAIL ADDRESS carloscorrales@lcec-inc.net	
4.	MAILING ADDRESS 1065 State Street, El Centro, CA	ZIP CODE 92243	PHONE NUMBER 760-353-8110

5.	PROPERTY (site) ADDRESS 7015 Brandt Rd., Calipatria, CA 92233	LOCATION Located off of Brandt Rd., east of Brandt Cattle Facility
6.	ASSESSOR'S PARCEL NO. 022-160-001	SIZE OF PROPERTY (in acres or square foot) 266.34 acres
7.	LEGAL DESCRIPTION (attach separate sheet if necessary) Please see attachment	
8.	EXPLAIN PURPOSE/REASON FOR MINOR SUBDIVISION Applicants are currently applying with the County of Imperial a Zone Change to the above mentioned APN in order to allow the expansion of their feedlot, however, the parcel in question is too large and requires a parcel map.	

9. Proposed DIVISION of the above specified land is as follows:

PARCEL	SIZE in acres or sq. feet	EXISTING USE	PROPOSED USE	ZONE
1 or A	107 +/- acres	Agriculture	Agriculture	A2G
2 or B	158 +/- acres	Agriculture	Agriculutre	A2G
3 or C				
4 or D				

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10.	DESCRIBE PROPOSED SEWER SYSTEM(s)	N/A
11.	DESCRIBE PROPOSED WATER SYSTEM	Raw water for feed operations will be fed from Gate H38 & H39 of H Lateral and Gate G42 of G Lateral
12.	DESCRIBE PROPOSED ACCESS TO SUBDIVIDED LOTS	Access will be granted via Brandt Rd.
13.	IS THIS PARCEL PLANNED TO BE ANNEXED? ☐ Yes ☒ No	IF YES, TO WHAT CITY or DISTRICT?

I HEREBY APPLY FOR PERMISSION TO DIVIDE THE ABOVE SPECIFIED PROPERTY THAT I ☐ OWN ☐ CONTROL, AS PER ATTACHED INFORMATION, AND PER THE MAP ACT AND PER THE SUBDIVISION ORDINANCE

I, CERTIFY THAT THE ABOVE INFORMATION, TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

Print Name (owner) _____ Date _____

Signature (owner) Tom E. DuBose Date 9/16/2019

Print Name (Agent) _____

Signature (Agent) _____

REQUIRED SUPPORT DOCUMENTS

A. TENTATIVE MAP
B. PRELIMINARY TITLE REPORT (6 months or newer)
C. FEE _____
D. OTHER _____

Special Note:
An notarized owners affidavit is required if application is signed by Agent

APPLICATION RECEIVED BY:	9M	DATE	9/16/19	REVIEW / APPROVAL BY OTHER DEPT'S required
APPLICATION DEEMED COMPLETE BY:		DATE		☐ P W
APPLICATION REJECTED BY:		DATE		☐ E H S
TENTATIVE HEARING BY:		DATE		☐ A P C D
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE		☐ O E S

PM# PM02483

Footnote:
William L. Brandt and Susan L. Brandt, Trustees of the Brandt Family Trust dated September 1, 2009 as to 4/7ths and Eric W. Brandt and Mark J. Brandt as to 3/14ths each.

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Legal Description for APN: 022-160-001

Lots 8 and 9, and the East half of the Southwest quarter of Section 6, in Township 12 South, Range 14 East; Lot 6 and the West 11.38 acres of Lot 5, all in Section 6, Township 12 South, Range 14 East; and the South half of the West one-third of the North half of Section 6, in Township 12 South, Range 14 East, San Bernardino Meridian, in the County of Imperial, State of California

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September 16, 2019

Proposed Brandt Cattle Minor Subdivision and Zone Change

Property Owners/ Applicant: Brandt Family Trust

Engineer: LC Engineering

Planning: DuBose Design Group, Inc.

Location: South/East of intersection of Peterson Rd. and Brandt Rd.

Parcel Size: 266.34 +/- acres

APN: 022-160-001

Proposed Development:

- Requesting approval of Minor Subdivision and Zone Change, doing so will create additional opportunities and will allow for adherence to *County of Imperial Title 9 Division 5 Zoning Areas Established.*

Current Jurisdictions:

- County of Imperial , CA,

Local Agency:

- County of Imperial, CA

Project Summary:

Overall Project

An original application for Zone Change was submitted on April 4th, 2019 and here now being revised to have two requested actions; (1) Request a Zone Change from A2 to A3 for the

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northern portion of APN: 022-160-001, referred to as Parcel A and (2) Request a Minor Subdivision to divide APN: 022-160-001 into two parcels, Parcel A and Parcel B (see **Appendix A**). Parcel A will encompass approximately 107 +/- acres and Parcel B will encompass approximately 158 +/- acres. Once a tentative parcel map is submitted, more accurate acreage sizes will be provided.

The proposed zone change to Parcel A is required for the expansion of the Brandt Co. Feedlot located at 7015 Brandt Rd., Calipatria, CA 92233, across the street from the proposed project site (see **Appendix B**). Until recently, it was realized that the proposed expansion of the feedlot which included the expansion of 30,000 head of cattle did not require the ENTIRE 266 +/- acres. The Minor Subdivision will divide the entire APN: 022-160-001 into two parcels, Parcel A and Parcel B (see **Appendix C**).

Current Site Conditions

The property is located within the County of Imperial, situated on approximately 266 +/- acres of agricultural land, nestled in between agriculture fields and an existing feedlot. The project site is located South/East of the intersection of Peterson Rd. and Brandt Rd with the APN 022-160-001. To the west of the property, the applicant currently operates an existing feedlot. Currently, the project site is comprised of one parcel owned by the applicant. The County of Imperial has right-of-way to the west/north/south of the property via Brandt Rd., Peterson Rd. and Lindsey Rd. In order to bring the proposed project into fruition, the applicant will be required to adhere to local agency/State and Federal standards

Zoning & Land Use

Zoning & Land Use within the County of Imperial

It is the intent of the applicant to propose a project that would conform to the General Plan, Zoning Regulations and policies of the County of Imperial. The goal of the applicant would be to sub-divide the current parcel into two (2) conjoined parcels. The Project Site is currently zoned A2 (see **Appendix D**) and a land use of Agriculture and through the previously mentioned Zone Change, the applicant intends to change the zone of Parcel A to A3.

Proposed Minor Subdivision

Concurrent with the Zone Change application, the applicant will apply for a Minor Subdivision permit application through the County of Imperial. The proposed minor subdivision will subdivide the current property into two (2) individual parcels.

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A Tentative Parcel Map along with a Parcel Map Waiver with of a Certificate of Compliance for recording the parcels will be required in order to accomplish the proposed subdivision. The parcel 022-160-001 will be reduced in size in order for the creation of two individual parcels. Beginning with the north portion of the proposed project site, Parcel A will have approximately 107 acres in area and will be located south of Peterson Rd., north of the H Drain and will include Montgomery Rd. The southern portion of the project site, Parcel B will have approximately 158 acres and will be located south of H Drain and north of Lindsey Rd. (see **Figure 1**).

Figure 1: Proposed Parcels	
Parcel A	107 +/- acres
Parcel B	158 +/- acres

Environmental Setting Information

(1) ***Current Project Site***

The current 266 +/- acre project site located south/east of the intersection of Peterson Rd. and Brandt Rd. is in close proximately to agricultural fields. The topography and soil make-up of the project site is consistent with most properties throughout Imperial Valley. Due to the proximately of the project site to agricultural lands, the plants and animals present within the project site would be similar to the majority of the agricultural farmland throughout the Imperial Valley. There is current a small portion located at the North/West corner of Parcel A that has been developed into onsite-use solar facility, encompassing approximately 8 acres of the entire 107 acres of Parcel A.

(2) ***Surrounding Properties***

There are additional types of properties surrounding the project site. Property just west of the proposed project site includes the existing Brandt Cattle Feedlot, property located to the north of the proposed project site includes an extension of the Brandt Cattle Feedlot, property to the east includes agricultural land and land owned by the City of Calipatria, and property to the south includes agricultural land. All surrounding land uses are similar in nature.

Water and Sewer Utilities

Currently, the project site receives water from IID. There are two canals that feed the entire project site including H Lateral and G Lateral(reference **Appendix E** for visual).

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Drainage Study

Prior to permit approval the existing drainage conditions at the proposed project site will be evaluated. Each parcel will provide on-site retention basin. Size, location and conveyance system will need approval by County Engineer.

Circulation

The western portion of the entire proposed project site's perimeter is lined by an Imperial County road, Brandt Rd. To the north of Parcel A lies Peterson Rd., a dirt road not normally traveled on by the general public. To the north of Parcel B lies Montgomery Rd., a dirt road not normally traveled on by the general public and to the south of Parcel B lies Lindsey Rd a dirt road not normally traveled on by the general public.

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Appendix A

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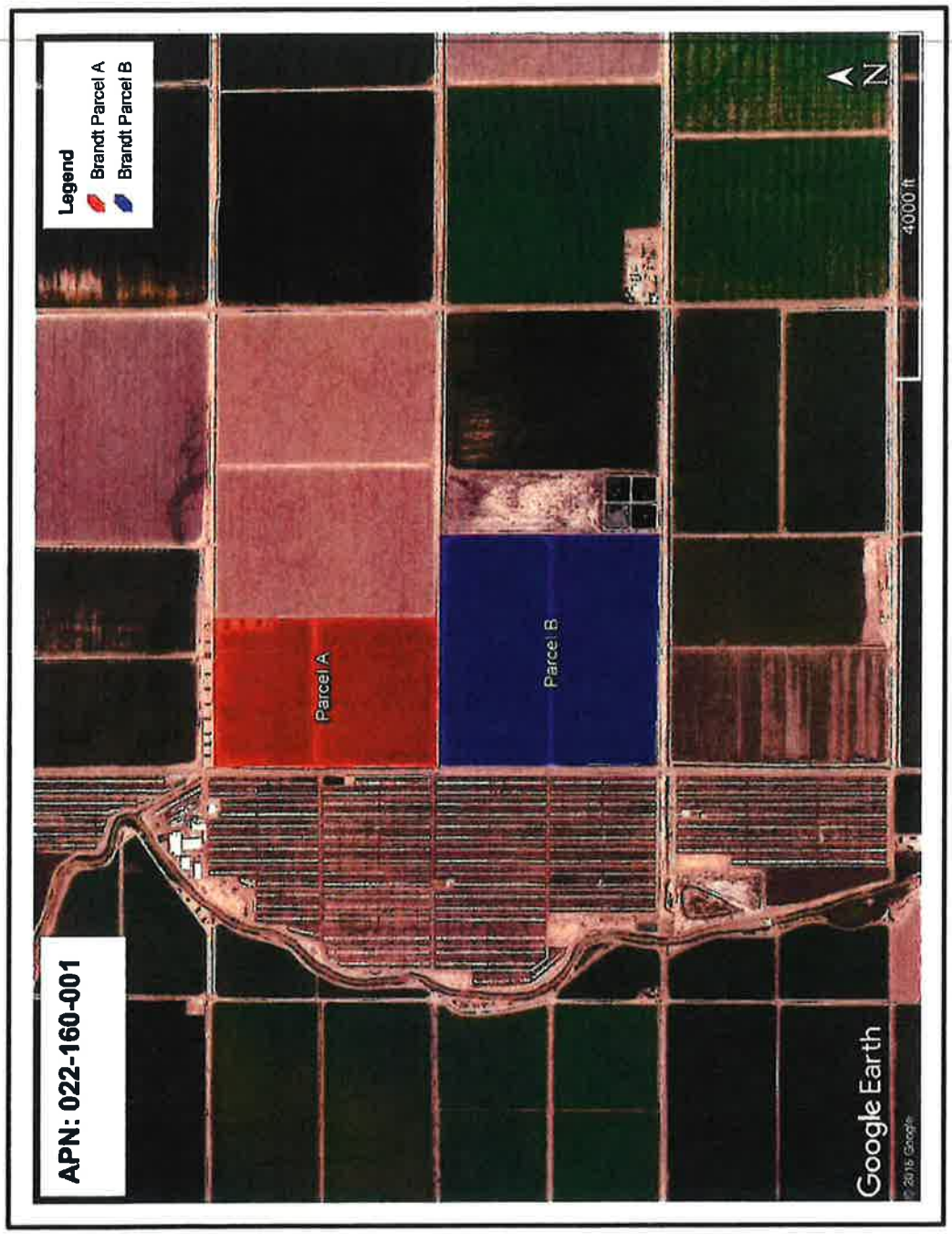

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Appendix B

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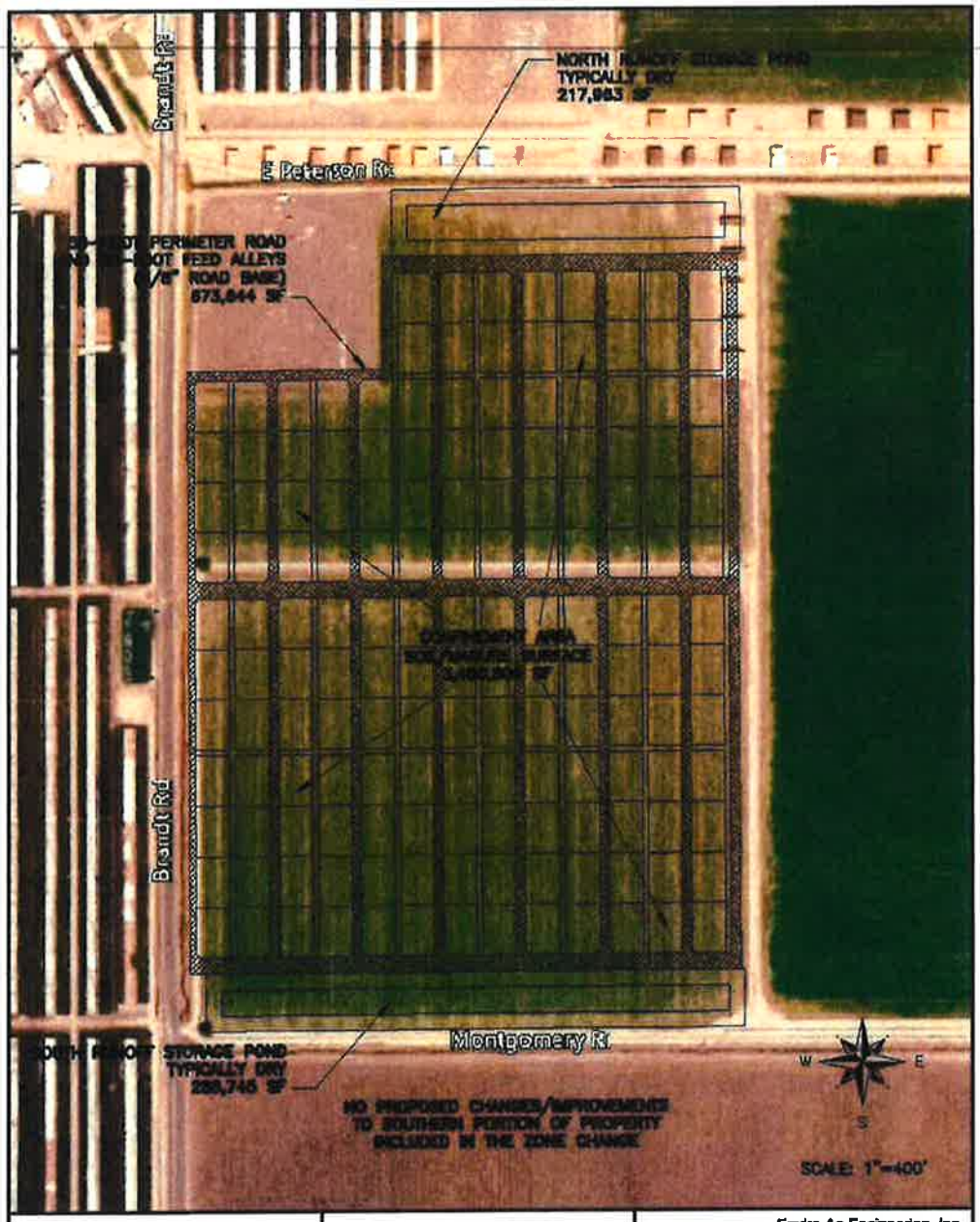

Brandt Company, Inc. Calipatria Imperial County, CA	Site Plan for Change of Zone Application	ENVIRO-AG EAE ENGINEERING, INC. Enviro-Ag Engineering, Inc. ENGINEERING CONSULTANTS 3404 Airway Boulevard AMARILLO, TEXAS 79118 TEL (806) 353-6123 FAX (806) 353-4132

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Appendix C

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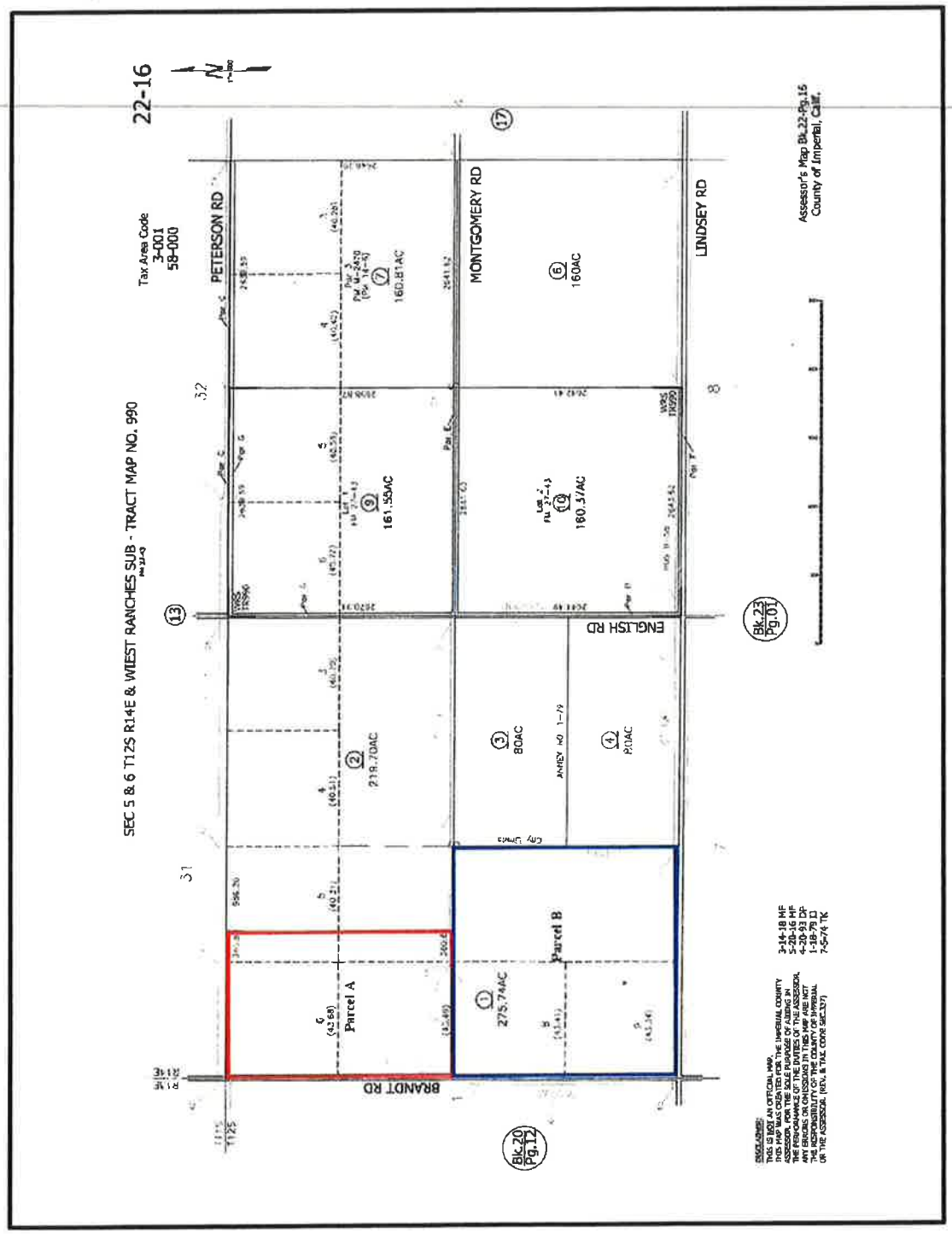

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Appendix D

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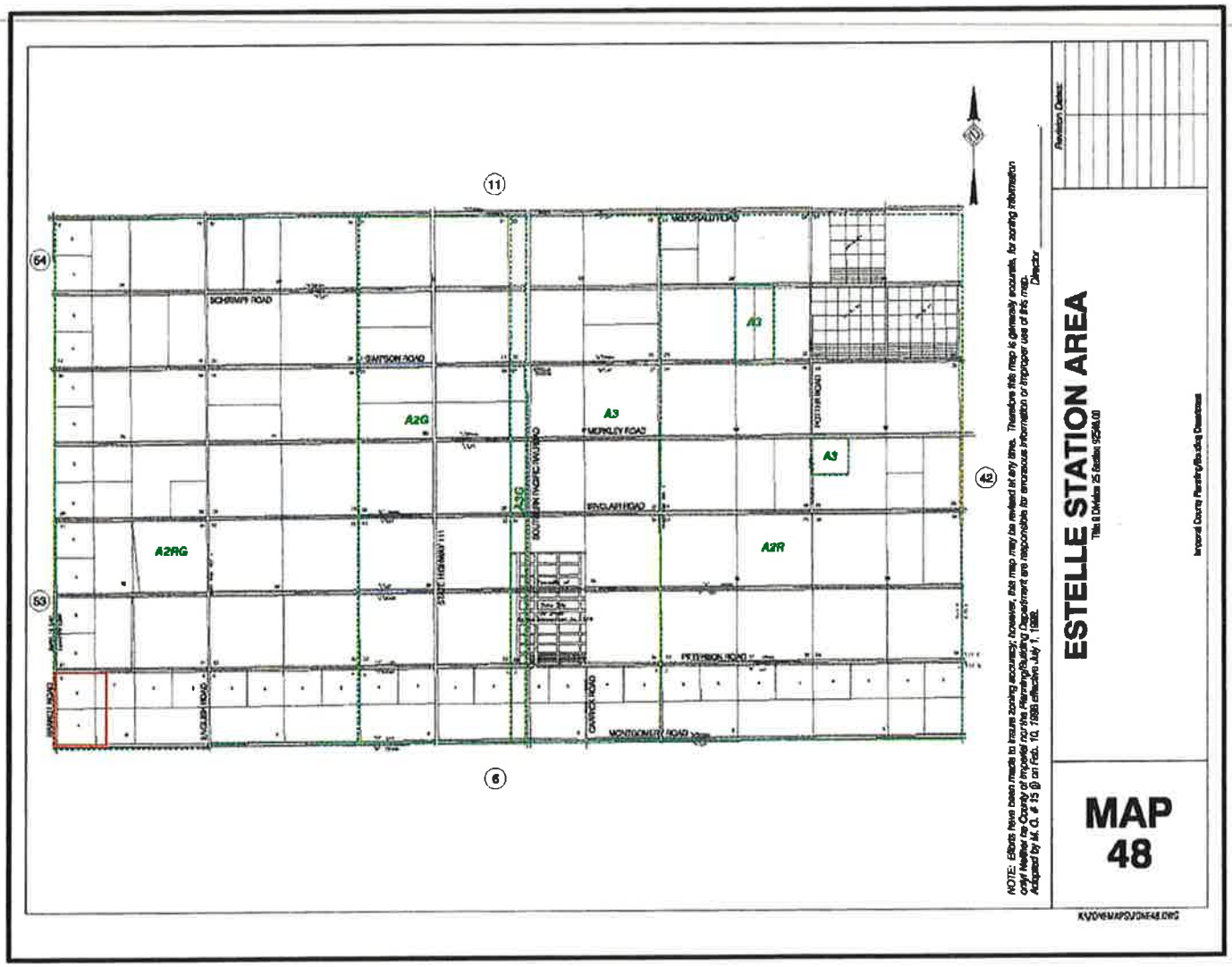

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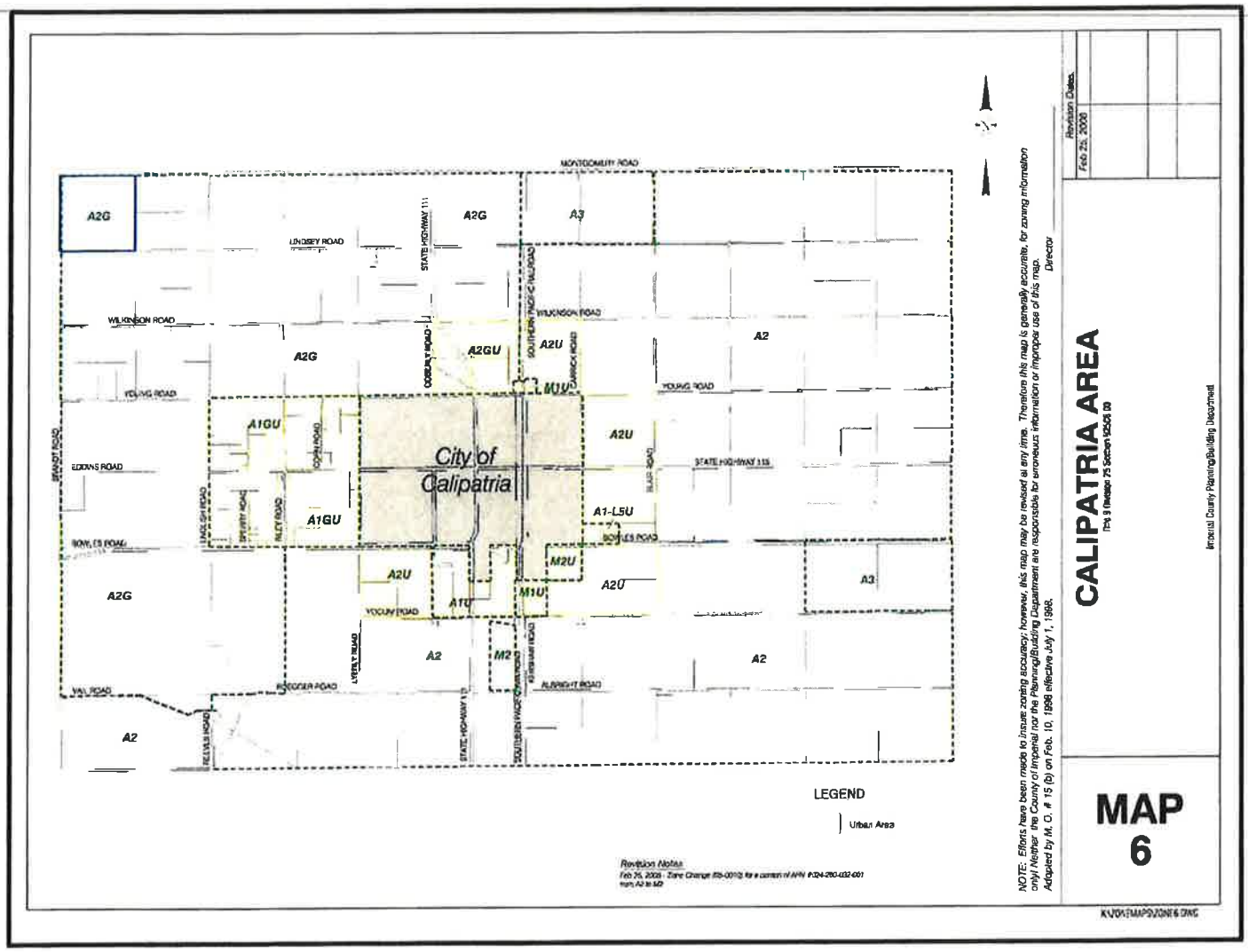

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Appendix E

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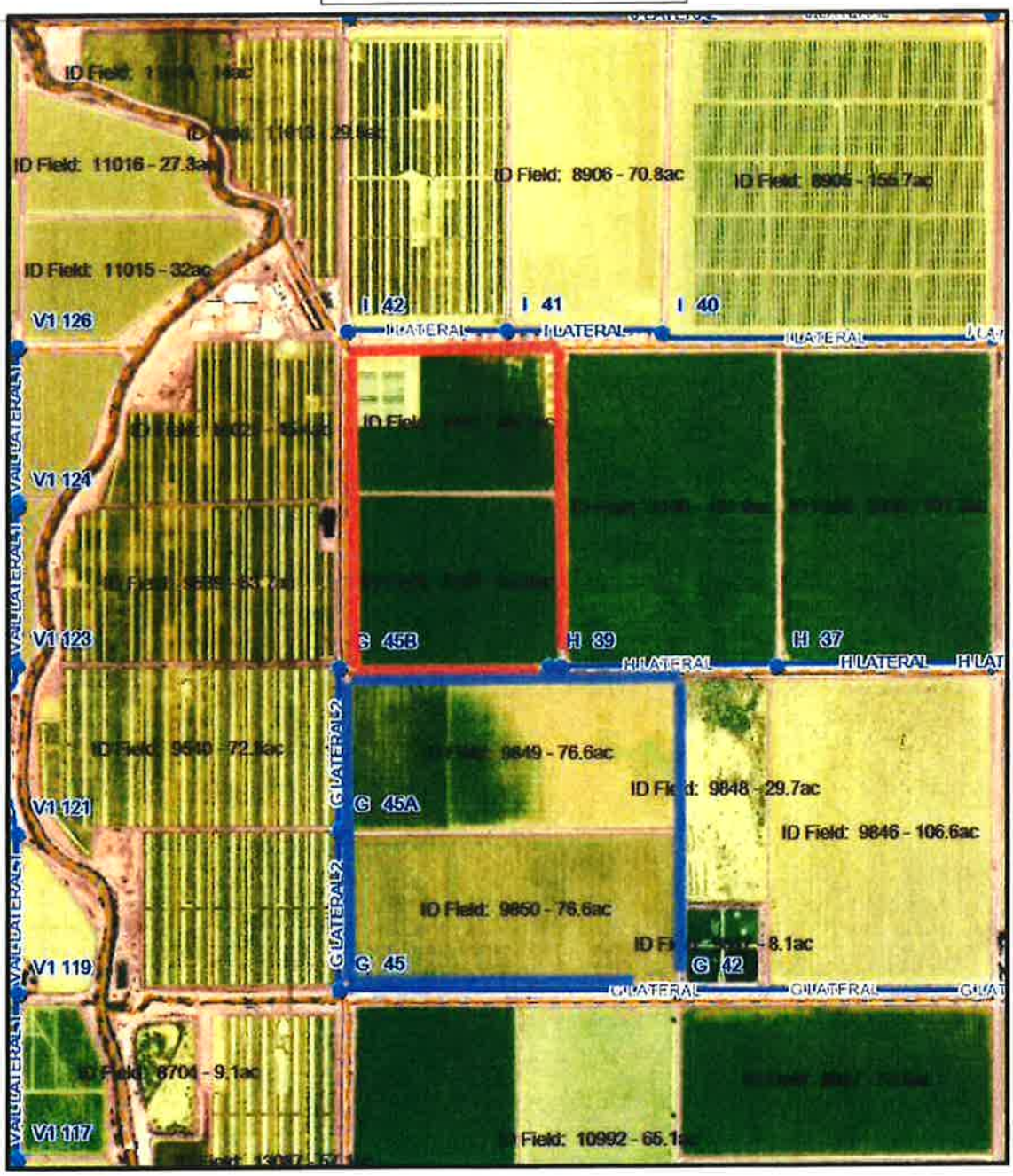
IID Water Service Map



AIR QUALITY AND GREENHOUSE GAS EMISSIONS STUDY
FOR
BRANDT COMPANY CATTLE FEEDING OPERATION EXPANSION

Prepared for:

Brandt Company, Inc.
299 W. Main Street
Brawley, California 92227-2240

Prepared By:

UltraSystems Environmental
16431 Scientific Way
Irvine, California 92618-4355

Job No. 7024

August 2019

This analysis was prepared in accordance with § 15063(d)(3) and Appendix G of the State CEQA Guidelines to determine the potential significant air quality effects on the physical environment that could result from the implementation of the project.

Report
Preparers:

Name & Title: MICHAEL ROGOZEN, Senior Principal Engineer

Signature: _____ Date: August 30, 2019

Name & Title: JOE O'BANNON, Staff Engineer

Signature: _____ Date: August 30, 2019

Name & Title: MIKE LINDSAY, Air and Noise Scientist

Signature: _____ Date: August 30, 2019

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

ATTACHMENTS

1.0 INTRODUCTION

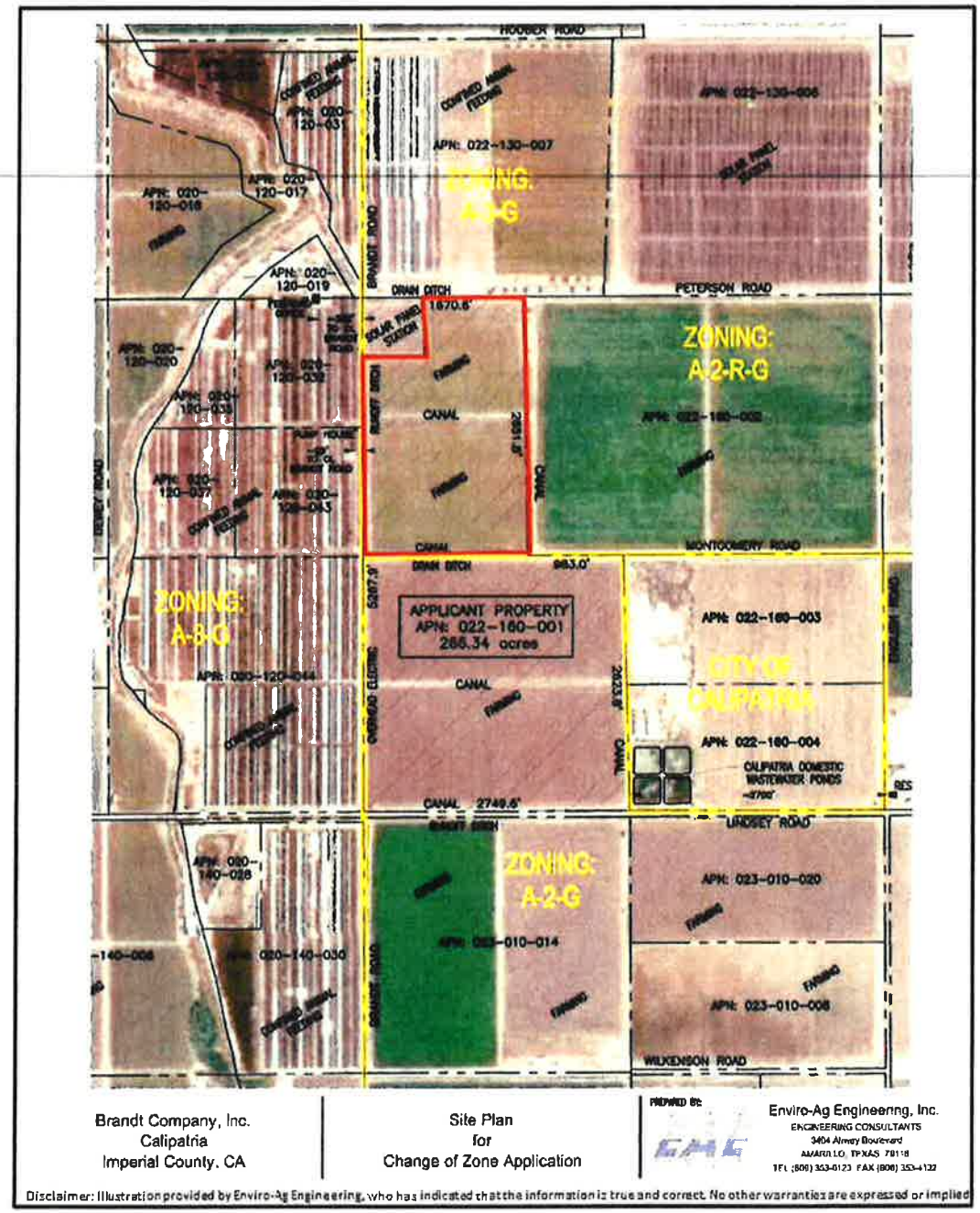
Brandt Company Inc., the applicant, operates a cattle feedlot located on both sides of Brandt Road between Wilkenson Road and East Hoober Road, about 3.5 miles northwest of the city of Calipatria, California, in Imperial County. The existing facility has a cattle headcount of 125,000, but is allowed by the Colorado River Regional Water Quality Control Board to have up to 135,000. The project proposes to expand these operations on a 266.34-acre site across Brandt Road (APN# 022-160-001). The new feedlot will house an additional 30,000 head of cattle. Operations at the proposed feedlot will be similar to those of the existing feedlot. The project vicinity is shown in **Figure 1.0-1.** Details of the proposed expansion are shown in **Figure 1.0-2.**

Brandt Company, Inc. has applied to the Imperial County Planning and Development Services Department to change the zoning for the project area from A-2-R-G (General Agriculture – Rural – Geothermal Overlay) to A-3 (Heavy Agriculture), allowing for the expansion of cattle feedlot. As the lead agency for the zone change request, the Imperial County Planning and Development Services Department is required by the California Environmental Quality Act (CEQA) to analyze the environmental impacts of the change. Two of the elements of the CEQA Initial Study (IS) that is currently being prepared are (1) air quality and (2) greenhouse gas (GHG) emissions.

This air quality and GHG analysis was conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code §§ 21000 et seq.). The methodology follows the CEQA Air Quality Handbook[1] prepared by the Imperial County Air Pollution Control District (ICAPCD) for quantification of emissions and evaluation of potential impacts on air resources.

1 CEQA Air Quality Handbook: Guidelines for the Implementation of the California Air Quality Act of 1970 as amended. Imperial County Air Pollution Control District. Final – December 12, 2017.

Figure 1.0-1
PROJECT VICINITY

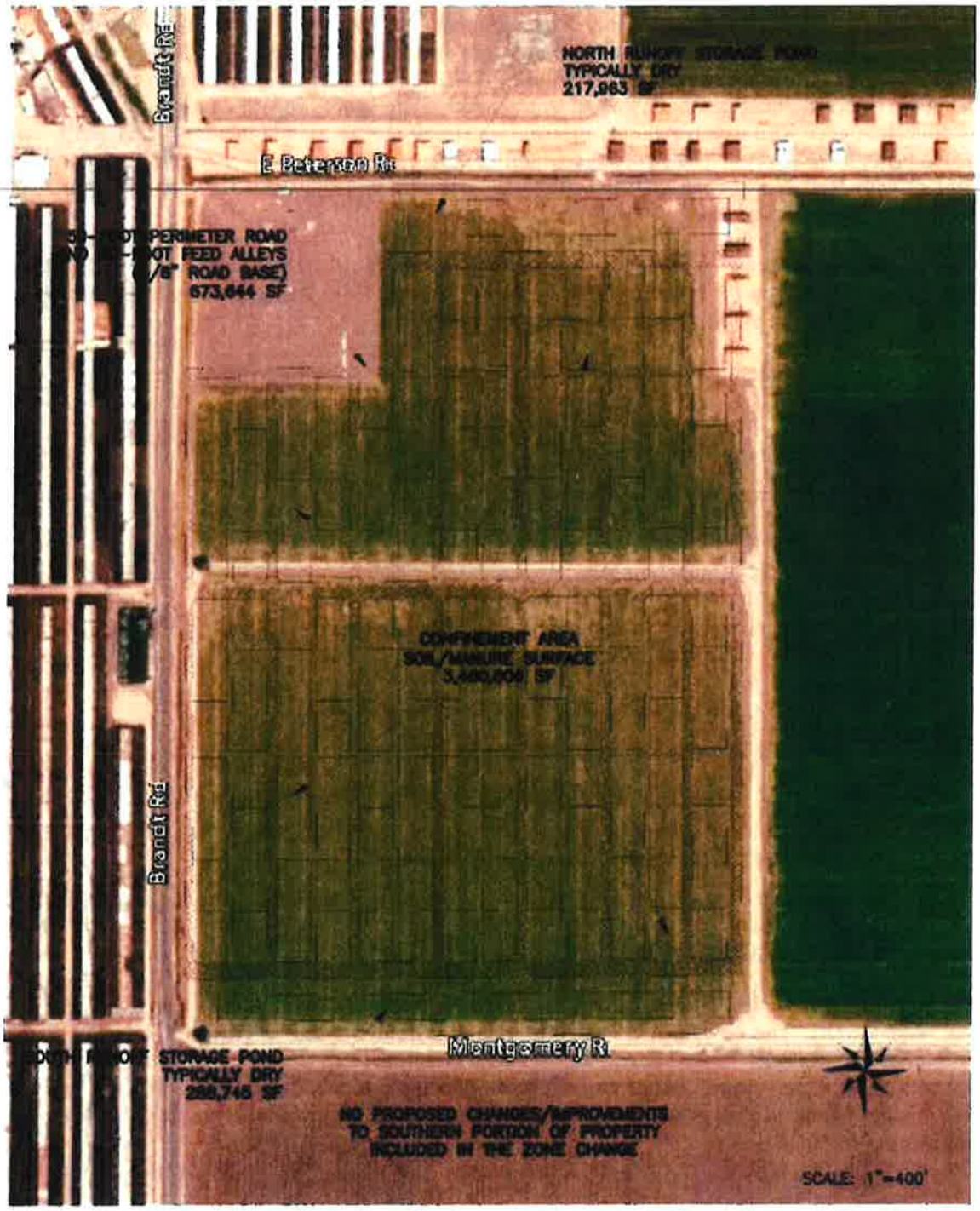


Sources: Enviro-Ag Engineering Inc., August 2019

UltraSystems

Brandt Feedlot Expansion Air Quality and Greenhouse Gas Emissions Report
Project Vicinity

Figure 1.0-2
PROJECT SITE PLAN



2.0 PROJECT DESCRIPTION

At present, the applicant operates a feedlot located mainly west of Brandt Road between Wilkenson Road and East Hoober Road. The applicant is proposing to expand this operation to a parcel across Brandt Road to the east to accommodate an additional 30,000 head. The new operation will be located within the northern portion of APN 022-160-001 existing between North Peterson Road to the north and Montgomery Road to the south. The operation will consist of a 79.91-acre confinement area with a soil/manure surface; two runoff storage ponds totaling 11.63 acres; and 15.46 acres of roadways. The roadways would consist of a 50-foot-wide perimeter road and six 30-foot-wide feed alleys. Each roadway will be topped with six inches of 0.375-inch diameter road base. The runoff storage pond will be about 10 feet deep.

Project construction is estimated to take 18 months. The starting date is unknown as of this writing. For evaluation purposes, it is estimated to be early January 2020. The major construction phases, some of which will be at least partially concurrent, will be:

- Clearing of existing crop cover.
- Site grading.
- Excavation of runoff storage pond.
- Grading of perimeter road and feed alleys.
- Laying of road base.
- Construction of confinement pens.

Once the planned improvements are completed, the facility will have four new employees. Increases in vehicle operations will be as follows:

- Approximately three extra incoming cattle trucks per week.
- Approximately 10 extra outgoing cattle trucks per week.
- Approximately 20 extra incoming feed ingredient trucks per week.
- Approximately four extra personal vehicles to and from the feedlot daily (for the 4 extra employees that will be needed for the new section).
- Approximately one new feed truck to cover the daily feeding of the cattle in the new section.

3.0 EXISTING CONDITIONS

The project site is located in an unincorporated area of Imperial County, which is in the Salton Sea Air Basin (SSAB). The SSAB includes the Imperial Valley and the central part of Riverside County, including the Coachella Valley. The Imperial Valley is bordered by the Salton Sea to the north, the Anza-Borrego Desert State Park to the west, the Chocolate Mountains to the northeast, and the U.S./Mexican Border to the south. The proposed site is located approximately 3.5 miles northwest of the city of Calipatria.

3.1 Existing Sensitive Land Uses

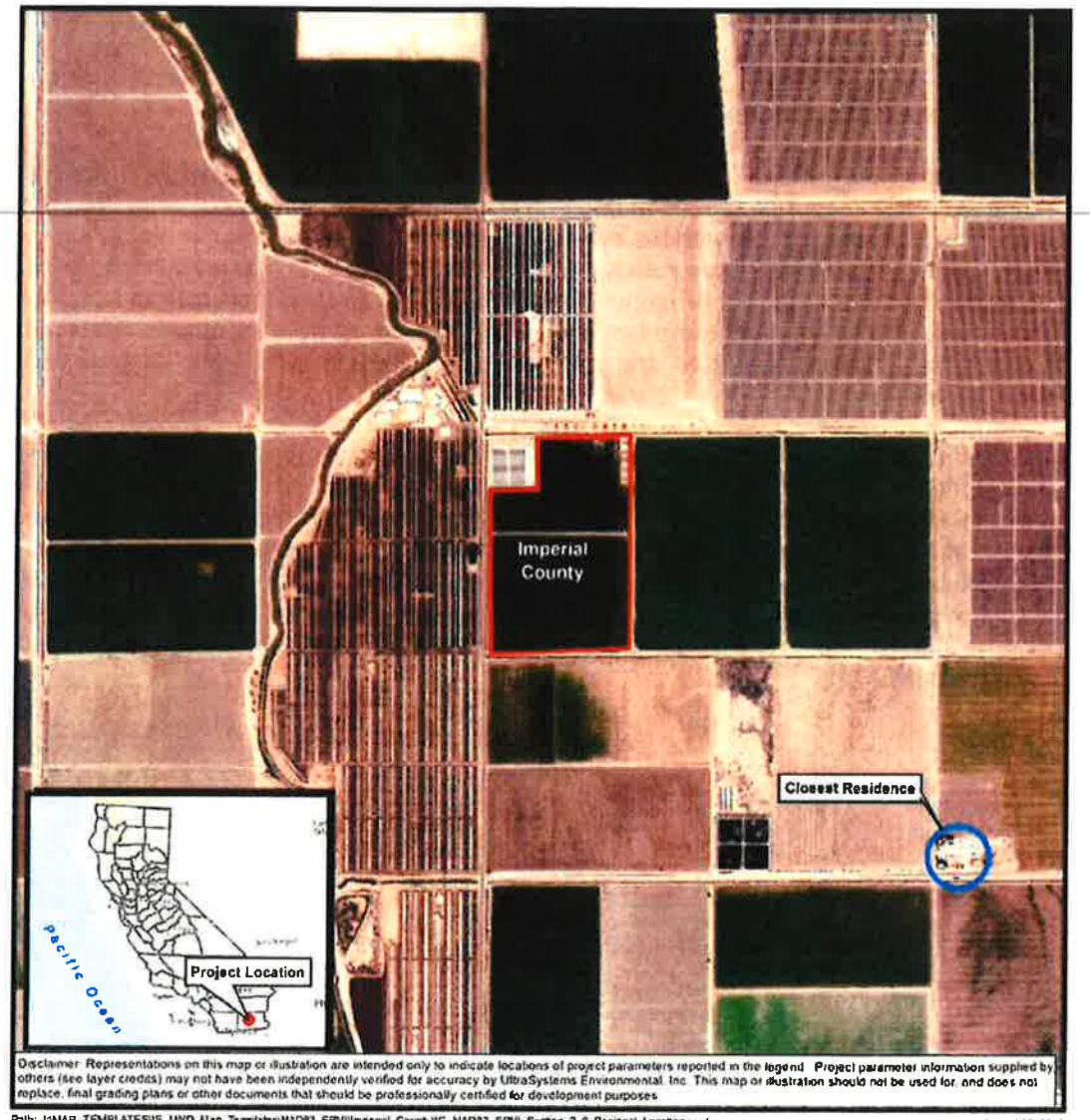
The project site is surrounded mostly by cultivated agricultural fields. Two residential structures are located within one mile of the proposed project, the nearest being 0.9 mile to the southeast. (See **Figure 3.1-1.**)

3.2 Regional Climate/Meteorology

Meteorology is the study of weather and climate. Weather refers to the state of the atmosphere at a given time and place regarding temperature, air pressure, humidity, cloudiness, and precipitation. The term "weather" refers to conditions over short periods; conditions over prolonged periods, generally at least 30 to 50 years, are referred to as climate. Climate, in a narrow sense, is usually defined as the "average weather," or more rigorously as the statistical description in terms of the mean and variability of relevant quantities over a period ranging from months to thousands or millions of years. These quantities are most often surface variables such as temperature, precipitation, and wind.

Climatic conditions in Imperial County are governed by the large-scale sinking and warming of air in the semi-permanent tropical high-pressure center of the Pacific Ocean. The high-pressure ridge blocks out most mid-latitude storms except in winter when the high is weakest and farthest south. The coastal mountains prevent the intrusion of any cool, damp air found in California coastal environs. Because of the weakened storms and barrier, Imperial County experiences clear skies, extremely hot summers, mild winters, and little rainfall. The flat terrain of the valley and the strong temperature differentials created by intense solar heating produce moderate winds and deep thermal convection.

Figure 3.1-1
SENSITIVE RECEPTORS IN PROJECT AREA



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\MAP_TEMPLATES\IS_MND_Map_Templates\NAD83_SPVI\Imperial_County\IC_NAD83_SPVI_Section_2_0_Regional_Location.mxd
August 29, 2019

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN and the GIS User Community, Cal Fire, 2007, UltraSystems Environmental, Inc., 2019

Scale 1:19,000

N

Legend

Project Boundary

Brandt Feedlot Expansion Air Quality and Greenhouse Gas Emissions Report

Sensitive Receptors in Project Area

0 500 1,000 Feet

0 200 400 Meters

UltraSystems

The subsiding air, protective mountains, and distance from the ocean all combine to limit precipitation severely. Rainfall is highly variable with precipitation from a single heavy storm sometimes exceeding the entire annual total during a later drought condition.

Imperial County enjoys a year-round climate characterized by a temperate fall, winter, and spring and a harsh summer. Humidity often combines with the valley's normal elevated temperatures to produce a moist, tropical atmosphere that frequently seems hotter than the thermometer suggests. The sun shines, on the average, more in Imperial County that anywhere else in the United States.

3.2.1 Temperature and Precipitation

The nearest National Weather Service Cooperative Observer Program weather station to the project is in Brawley near Mulberry Elementary School, approximately 11.3 miles southeast of the project. At the Brawley station,[2] average recorded rainfall during the period of record (1910 to 2007) measured 2.65 inches, with 72% of precipitation occurring between October and March and 47% in just December, January, and February. Monthly average maximum temperatures at this station vary annually by 38.2 degrees Fahrenheit (°F): 107.6°F at the hottest to 69.4°F at the coldest and monthly average minimum temperatures vary by 36.9°F annually; i.e., from 38.9°F to 75.8°F. In fact, this station shows that the months of June, July, August, and September have monthly maximum temperatures greater than 100°F.

3.2.2 Humidity

Humidity in Imperial County is typically low throughout the year, ranging from 28% in summer to 52% in winter. The large daily oscillation of temperature produces a corresponding large variation in the relative humidity. Nocturnal humidity rises to 50-60% but drops to about 10% during the day. Summer weather patterns are dominated by intense heat-induced low-pressure areas that form over the interior desert.

3.2.3 Wind

The wind direction follows two general patterns. The first occurs from fall through spring, where prevailing winds are from the west and northwest. Most of these winds originate in the Los Angeles Basin. The second pattern consists of occasional periods of high winds. Wind speeds exceeding 31 miles per hour (mph) occur most frequently in April and May. On an annual basis, high winds, those exceeding 31 mph, are observed 0.6 percent of the time, while speeds of less than 6.8 mph account for more than half of the observed winds. Wind statistics indicate that prevailing winds are from the west-northwest through southwest; however, a secondary flow pattern from the southeast is also evident.

3.2.4 Inversions

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed in the atmosphere. The stability of the atmosphere is one of the key factors affecting pollutant dispersion. Atmospheric stability regulates the amount of vertical and horizontal air exchange, or mixing, that can occur within a given air basin.

2 Western U.S. Climate Historical Summaries. Western Regional Climate Center. http://www.wrcc.dri.edu/Climsum.html. Accessed October 2018.

Horizontal mixing is a result of winds, as discussed above, but vertical mixing also affects the degree of stability in the atmosphere. An interruption of vertical mixing is called an inversion.

In the atmosphere, air temperatures normally decrease as altitude increases. However, the presence of the Pacific High-Pressure Cell can cause elevated air to warm to a temperature higher than that of the air below. This highly stable atmospheric condition, termed a subsidence inversion, can act as a nearly impenetrable lid to the vertical mixing of pollutants. The strength of these inversions makes them difficult to disrupt. Consequently, they can persist for one or more days, causing air stagnation and the buildup of pollutants. Highest or worst-case ozone levels are often associated with the presence of this type of inversion.

Imperial County experiences surface inversions almost every day of the year. Due to strong surface heating, these inversions are usually broken, allowing pollutants to disperse more easily. Weak, surface inversions are caused by radiational cooling of air in contact with the cold surface of the earth at night. In valleys and low-lying areas, this condition is intensified by the addition of chilly air flowing down slope from the hills and pooling on the valley floor.

3.3 Regulatory Setting

Federal, state, and local agencies have set ambient air quality standards for certain air pollutants through statutory requirements and have established regulations and various plans and policies to maintain and improve air quality, as described below.

3.3.1 Air Pollutants of Concern[3]

As required by the Federal Clean Air Act (FCAA), the U. S. Environmental Protection Agency (USEPA) has identified criteria pollutants and established National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. NAAQS have been established for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide, suspended particulate matter (PM), and lead. Suspended PM includes both PM with an aerodynamic diameter of 10 micrometers or less (respirable PM, or PM_{10}) and PM with an aerodynamic diameter of 2.5 micrometers or less (fine PM, or $PM_{2.5}$). The California Air Resources Board (ARB) has established separate standards for the state; i.e., the California Ambient Air Quality Standards (CAAQS). The ARB established CAAQS for all the federal pollutants, plus sulfates, hydrogen sulfide, and visibility-reducing particles.

For some of the pollutants, the identified air quality standards are expressed in more than one averaging time to address the typical exposures found in the environment. For example, CO is expressed as a one-hour averaging time and an eight-hour averaging time. Regulations have set NAAQS and CAAQS limits in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$). **Table 3.3-1** summarizes the state and federal ambient air quality standards for all criteria pollutants. Criteria pollutants of concern in Imperial County are ozone and PM, since the standards for other criteria pollutants are either being met or are unclassified in the county, and the latest pollutant trends suggest that these standards will not be exceeded in the foreseeable future.

3 This section discusses only criteria pollutants. Greenhouse gases are defined and discussed in **Section 5.**

Table 3.3-1
AMBIENT AIR QUALITY STANDARDS FOR CRITERIA AIR POLLUTANTS

Air Pollutant	Averaging Time	California Standard	National Standard
Ozone (O_3)	1 hour 8 hour	0.09 ppm 0.070 ppm	— 0.070 ppm *
Respirable particulate matter (PM_{10})	24 hours Mean	50 µg/m³ 20 µg/m³	150 µg/m³ —
Fine particulate matter ($PM_{2.5}$)	24-hour Annual Arithmetic Mean	— 12 µg/m³	35 µg/m³ 12.0 µg/m³
Carbon monoxide (CO)	1 hour 8 hour	20 ppm 9.0 ppm	35 ppm 9 ppm
Nitrogen dioxide (NO_2)	1 hour Mean	0.18 ppm 0.030 ppm	100 ppb 0.053 ppm
Sulfur dioxide (SO_2)	1 hour 24 hour	0.25 ppm 0.04 ppm	75 ppb —
Lead	30-day Rolling 3-month	1.5 µg/m³ —	— 0.15 µg/m³
Sulfates	24 hour	25 µg/m³	**No National Standards**
Hydrogen sulfide	1 hour	0.03 ppm	
Vinyl chloride	24 hour	0.01 ppm	
Visibility-reducing particles	8 hour	Extinction coefficient of 0.23 per kilometer, visibility of ten miles or more due to particles when relative humidity is less than 70%.	

* On October 1, 2015, the national 8-hour ozone standard was lowered from 0.075 to 0.070 ppm.

Abbreviations:
ppm = parts per million
µg/m³ = micrograms per cubic meter
ppb = parts per billion
Mean = Annual Arithmetic Mean
30-day = 30-day average

Ozone (O_3) is not emitted directly to the atmosphere but is formed by photochemical reactions between reactive organic gases (ROG), or volatile organic compounds[4] (VOC), and oxides of nitrogen (NO_X) in the presence of sunlight. The long, hot, humid days of summer are particularly conducive to ozone formation; thus, ozone levels are of concern primarily during May through September. Ozone is a strong chemical oxidant that adversely impacts human health through effects on respiratory function. It can also damage forests and crops. Tropospheric[5] ozone is formed by a complex series of chemical reactions involving nitrogen oxides, the result of combustion processes and evaporative ROGs such as industrial solvents, toluene, xylene, and hexane; as well as the various hydrocarbons that are evaporated from the gasoline used by motor vehicles or emitted through the tailpipe following combustion. Additionally, ROGs are emitted by natural sources such as trees and crops. Ozone formation is promoted by strong sunlight, warm temperatures, and winds. High concentrations tend to be a problem in Imperial County only during the hot summer months when these conditions frequently occur.

Reactive Organic Gases (ROG) are defined as any compound of carbon, excluding CO, carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participate in atmospheric photochemical reactions. It should be noted that there are no state or national ambient air quality standard for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formulation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility.

Nitrogen Oxides (NO_X) serve as integral participants in the process of photochemical smog production. The two major forms of NO_X are nitric oxide (NO) and nitrogen dioxide (NO_2).[6] NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown irritating gas formed by the combination of NO and oxygen. NO_X is an ozone precursor. A precursor is a directly-emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an Ambient Air Quality Standard (AAQS) has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQSs. When NO_X and ROG are released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone.

Particulate Matter (PM) is a general term used to describe a complex group of airborne solid, liquid, or semi-volatile materials of various size and composition. Primary PM is emitted directly into the atmosphere from both human activities (including agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air) and non-anthropogenic activities (such as windblown dust and ash resulting from forest fires). Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides and NO_X, and ROGs. The overwhelming majority of airborne PM in Imperial

4 Emissions of organic gases are typically reported only as aggregate organics, either as Volatile Organic Compounds (VOC) or as Reactive Organic Gases (ROG). These terms are meant to reflect what specific compounds have been included or excluded from the aggregate estimate. Although the USEPA defines VOC to exclude both methane and ethane, and the ARB defines ROG to exclude only methane, in practice it is assumed that VOC and ROG are essentially synonymous.

5 The troposphere is the atmospheric layer closest to the Earth's surface. Ozone produced here is an air pollutant that is harmful to breathe, and it damages crops, trees and other vegetation.

6 Another form of NO_X, nitrous oxide (N_2O), is a greenhouse gas and is discussed below.

County is primary PM. The major source of primary PM is fugitive windblown dust, with other contributions from entrained road dust, farming, and construction activities.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have established two types of PM air quality standards, as shown in **Table 3.3-1**. PM_{10} corresponds to the fraction of PM no greater than 10 micrometers in aerodynamic diameter and is commonly called respirable particulate matter, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 micrometers, which is commonly called fine particulate matter.

PM air pollution has undesirable and detrimental environmental effects. PM affects vegetation, both directly (e.g. deposition of nitrates and sulfates may cause direct foliar damage) and indirectly (e.g. coating of plants upon gravitational settling reduces light absorption). PM also accumulates to form regional haze, which reduces visibility due to scattering of light.

3.3.2 Ammonia

Ammonia (NH_3) is addressed in the 2013 $PM_{2.5}$ SIP[7] due to its role as a precursor to PM_{10}, specifically the wintertime violations. The cooler temperatures and higher humidity of the winter months are conducive to ammonium nitrate (NH_4NO_3) formation through a complex process involving NO_x, NH_3, and ROGs. This occurs both at the surface and aloft, via both daytime and nighttime chemistry. Understanding the interactions amongst these precursors is needed to design an appropriate and effective approach to reduce NH_4NO_3. The 2020 Imperial County Emission Inventory[8] shows that about 48% of the NH_3 is generated from farming operations (primarily feedlots) and another 46% is from the use of pesticides and fertilizers.

3.3.3 Applicable Regulations

3.3.3.1 Federal Regulations

The federal Clean Air Act (FCAA), passed in 1970, established the national air pollution control program. The basic elements of the FCAA are the National Ambient Air Quality Standards (NAAQS) for criteria air pollutants (discussed above), hazardous air pollutants standards, state attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions.

Data collected at permanent monitoring stations are used by the USEPA to classify regions as "attainment" or "nonattainment," depending on whether the regions met the requirements stated in the primary NAAQS. In addition, the FCAA uses a classification system to design cleanup requirements appropriate for the severity of the pollution and set realistic deadlines for reaching cleanup goals. If an air basin is not in federal attainment for a particular pollutant, the Basin is classified as a marginal, moderate, serious, severe, or extreme nonattainment area, based on the

7 Imperial County 2013 SIP for the 2006 24-hr PM2.5 Moderate Nonattainment Area. Imperial County Air Pollution Control District. December 2, 2014.

8 Almanac Emissions Projection Data. California Air Resources Board. http://www.arb.ca.gov/app/emsinv/. Accessed May 2017.

estimated time it would take to reach attainment. Nonattainment areas must take steps towards attainment by a specific timeline. This is discussed further in **Section 3.4**.

Although new source performance standards have been set for a wide variety of air pollution emissions sources, no federal regulations govern emissions from livestock operations.

3.3.3.2 State Regulations

The State of California began to set CAAQS in 1969 under the mandate of the Mulford-Carrell Act. There were no attainment deadlines for the CAAQS originally. However, the State Legislature passed the California Clean Air Act (CCAA) in 1988 to establish air quality goals, planning mechanisms, regulatory strategies, and standards of progress to promote their attainment. The ARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for ensuring implementation of the CCAA, responding to the FCAA, and for regulating emissions from motor vehicles and consumer products.

The CCAA requires attainment of CAAQS by the earliest practicable date. The state standards are generally more stringent than the corresponding federal standards. Attainment plans are required for air basins in violation of the state ozone, PM_{10}, CO, SO_2, or NO_2 standards. Responsibility for achieving state standards is placed on the ARB in cooperation with local air pollution control districts/air quality management districts. District plans for nonattainment areas must be designed to achieve a 5% annual reduction in emissions. Preparation of and adherence to attainment plans are the responsibility of the local air pollution districts or air quality management districts. CAAQS are included in **Table 3.3-1**.[9]

Senate Bill 700 (Chapter 479, Statutes of 2003)

SB 700 deals with agricultural air pollution and specifies how California will conform to federal and state air pollution laws. Prior to the adoption of SB 700, California law had exempted agricultural sources from requirements to obtain air permits. This had resulted in a conflict between state and federal law, and California faced sanctions if it failed to correct the problem. SB 700 defined "agricultural source," removed the restriction from state law that prevented air districts from requiring permits for agricultural sources, required emission-control regulations in areas that have not attained NAAQS for PM_{10} and required permits and emissions mitigation for confined animal facilities.[10]

3.3.4 Air Quality Plans

3.3.4.1 Ozone Plan

On December 3, 2009, the USEPA issued a final ruling determining that the Imperial County "moderate" 8-hour ozone non-attainment area attained the 1997 8-hour NAAQS for ozone. The determination by the USEPA was based upon complete, quality-assured, and certified ambient air monitoring data for 2006 through 2008. This determination effectively suspended the requirement for the state to submit an attainment demonstration, an RFP plan, contingency measures, and other planning requirements for so long as Imperial County continues to attain the 1997 8-hour ozone

9 Ambient Air Quality Standards. California Air Resources Board. https://www.arb.ca.gov/research/aaqs/aaqs2.pdf. May 4, 2016. Accessed October 2018.

10 Health and Safety Code Sections 39011.5, 39023.3, 40724-40724.7, 40731, 42301.16-, 42301.18, 42310 and 44559.9.

NAAQS. However, this determination did not constitute a re-designation to attainment; therefore, the classification and designation status for Imperial County remain as a "moderate" non-attainment area of the 1997 8-hour ozone NAAQS. Imperial County was required to submit for USEPA approval a 2009 8-Hour Ozone "Modified" Air Quality Management Plan (Modified AQMP), which was approved July 13, 2010.

The Modified AQMP served as a comprehensive planning document intended to provide guidance to the ICAPCD, the County, and other local agencies on how to continue maintaining the 1997 8-hour ozone NAAQS. The Modified AQMP includes control measures consisting of three components: 1) the ICAPCD's Stationary Source Control Measures; 2) Regional Transportation Control Measures; and 3) the State Strategy. These measures primarily rely on the traditional command and control approach and provide the framework for ICAPCD rules that reduce ROG and NO_X emissions.

The current designation for the PM_{10} standard remains nonattainment as of September 30, 2018.[11] The ICAPCD is in the process of requesting an attainment redesignation and maintenance plan.[12] However, Imperial County's 2017 Ozone SIP[13], demonstrates that Imperial County is in attainment of the 2008 8-hour ozone standard but for emissions emanating across the international border. In addition, a weight-of-evidence analysis has been included to show that Imperial County will maintain this status of attainment through the July 2018 attainment date.

As of November 2017, after consideration of the ARB's recommendations, the USEPA "is designating Imperial County, CA as nonattainment for the 2015 ozone NAAQS."[14]

3.3.4.2 PM_{10} Plan

The ICAPCD District Board of Directors adopted the PM_{10} SIP for Imperial County on August 11, 2009.[15] The PM_{10} SIP meets USEPA requirements to demonstrate that the County will attain the PM_{10} standard as expeditiously as practicable. The PM_{10} SIP was required to address and meet the following elements, required under the FCAA of areas classified to be in serious nonattainment of the NAAQS:

- Best available emission inventories.
- A plan that enables attainment of the PM_{10} federal air quality standards.
- Annual reductions in PM_{10} or PM_{10} precursor emissions that are of not less than 5% from the date of SIP submission until attainment.
- Best available control measures and best available control technologies for significant sources and major stationary sources of PM_{10}, to be implemented no later than four years after reclassification of the area as serious.

11 Green Book PM-10 (1987) Area Information. United States Environmental Protection Agency. https://www.epa.gov/green-book/green-book-pm-10-1987-area-information. Accessed October 2018.

12 Draft Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter. Imperial County Air Pollution Control District. September 2018.

13 2017 Imperial County State Implementation Plan for the 2008 8-Hour Ozone Standard. Imperial County Air Pollution Control District, September 12, 2017.

14 California – Final Area Designations for the 2015 Ozone National Ambient Air Quality Standards, Technical Support Document. United States Environmental Protection Agency. November 16, 2017.

15 2009 Imperial County State Implementation Plan for Particulate Matter Less Than 10 Microns in Aerodynamic Diameter. Imperial County Air Pollution Control District. July 10, 2009.

- Transportation conformity and motor vehicle emission budgets in accord with the attainment plan.
- Reasonable further progress and quantitative milestones.
- Contingency measures to be implemented (without the need for additional rulemaking actions) if the control measure regulations incorporated in the plan cannot be successfully implemented or fail to give the expected emission reductions.

The PM_{10} SIP updated the emission inventory to incorporate revised cattle emissions, revised windblown dust model results, revised Southern California Association of Governments (SCAG) activity data, and updated entrained and windblown unpaved road dust estimates. The adjustments made to the emission inventory fell in two categories: (1) adjustments to incorporate new methodology and updated information (e.g. throughputs, activity data, etc.); and (2) adjustments to incorporate emission reductions arising from the implementation of new control measures.

Additionally, the PM_{10} SIP demonstrates that Imperial County attained the Federal PM_{10} NAAQS, but for international emissions from Mexico, based on 2006–2008 monitoring data. Attainment was due, in part, to ICAPCD's November 2005 adoption and subsequent implementation of Regulation VIII fugitive dust rules; those rules were based on the related 2005 Best Available Control Measure (BACM) analysis.

Since the reclassification of Imperial County to serious nonattainment for PM_{10} occurred in August 2004, control of fugitive PM_{10} emissions from the significant source categories that meets BACM stringency identified in the PM_{10} SIP began in January 2006.

Major stationary sources are required to implement Best Available Control Technology (BACT) to control PM_{10} emissions (Rule 207) and they are required to comply with the 20% opacity rule (Rule 403). In addition, stationary sources will be required to mitigate fugitive dust emissions from access roads, construction activities, handling and transferring of bulk materials, and track-out/carry-out according to the requirements of Regulation VIII.

Because Imperial County is shown in the PM_{10} SIP to have attained the 24-hour PM_{10} NAAQS but for international transport of Mexicali, Mexico emissions in 2006–2008, reasonable further progress and milestone requirements are unnecessary, and specifically the 5% yearly emission reductions requirement does not apply to future years. As documented in the PM_{10} SIP, all remaining SIP requirements applicable to the 2009 Imperial County PM_{10} Plan have been successfully addressed.

3.3.4.3 $PM_{2.5}$ Plan

The ICAPCD District Board of Directors adopted the $PM_{2.5}$ SIP for Imperial County on December 2, 2014.[16] The $PM_{2.5}$ SIP fulfills the requirements of the CAA for those areas classified as "moderate" nonattainment for $PM_{2.5}$. It incorporates updated emission inventories, and analysis of Reasonable Available Control Measures (RACM), an assessment of Reasonable Further Progress (RFP), and a discussion of contingency measures. Analyses in the $PM_{2.5}$ SIP included assessing emission inventories from Imperial County and Mexicali; evaluating the composition and elemental makeup of samples collected on Calexico violation days; reviewing the meteorology associated with high concentration measurements; and performing directional analysis of the sources potentially

16 Imperial County 2013 SIP for the 2006 24-hr PM2.5 Moderate Nonattainment Area. Imperial County Air Pollution Control District. December 2, 2014.

impacting the Calexico $PM_{2.5}$ monitor. As is demonstrated in the $PM_{2.5}$ SIP, the primary reason for elevated $PM_{2.5}$ levels in Imperial County is transport from Mexico. Essentially, the $PM_{2.5}$ SIP demonstrated attainment of the 2006 $PM_{2.5}$ NAAQS "but for" transport of international emissions from Mexicali, Mexico.

3.3.5 Local Regulations

3.3.5.1 Air Quality

The ICAPCD also has the authority to adopt and enforce regulations dealing with controls for specific types of sources, emissions of hazardous air pollutants, and New Source Review. The ICAPCD Rules and Regulations are part of the SIP and are separately enforceable by the EPA. The following ICAPCD rules potentially apply to the project.

Rules 800 (General Requirements for Control of Fine Particulate Matter [PM-10]), **801** (Construction and Earthmoving Activities), **802** (Bulk Materials), **803** (Carry-out and Track-out), **804** (Open Areas), and **805** (Paved and Unpaved Roads) are intended to reduce the amount of PM_{10} entrained in the ambient air as a result of emissions generated by anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate PM_{10} emissions. These rules include opacity limits, control measure requirements, and dust control plan requirements that apply to activities at a facility.

Rule 217 (Large Confined Animal Facilities [LCAF] Permits Required) requires owners/operators of any confined animal facility considered large in operation, including beef feedlots that maintain at least 3,500 head of beef cattle, to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) for the facility. The rule includes a comprehensive set of "mitigation measures" to reduce ammonia emissions.

Rule 420 (Beef Feedlots) requires any person using or operating an LCAF to include in the submission for a permit set forth in Rule 217, a written plan designed to effectively control dust. The Dust Control Plan is to contain (1) procedures for assuring that manure is at all times maintained at a moisture factor between 20% and 40%, in the top three inches in occupied pens and (2) an outline of manure management practices, including standards and time tables for manure removal, designed to effectively control dust and to prevent adverse public health conditions.

3.3.5.2 Right-to-Farm Ordinance

In recognition of the role of agriculture in the county, Imperial County has adopted a right-to-farm ordinance. A "right-to-farm" ordinance creates a legal presumption that ongoing, standard farming practices are not a nuisance to adjoining residences. It requires a disclosure to owners and purchasers of property near agricultural land operations, or areas zoned for agricultural purposes. The disclosure advises persons that discomfort and inconvenience from odors, fumes, dust, smoke, and chemicals resulting from conforming and accepted agricultural operations are normal and necessary aspects of living in the agricultural areas of the county.

3.4 Regional Air Quality

Table 3.4-1 shows the area designation status of Imperial County for each criteria pollutant for both the NAAQS and the CAAQS.

Table 3.4-1
FEDERAL AND STATE ATTAINMENT STATUS FOR IMPERIAL COUNTY

Pollutant	State Designation	Federal Designation (Classification)
Ozone	Nonattainment	Nonattainment
Respirable PM (PM_{10})	Nonattainment	Nonattainment (Serious) *
Fine PM ($PM_{2.5}$)	Attainment***	Nonattainment (Moderate) **
Carbon Monoxide (CO)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide	Attainment	Attainment
Sulfates	Attainment	**No Federal Standard**
Lead	Attainment	
Hydrogen Sulfide	Unclassified	
Visibility reducing Particles	Unclassified	

* Designation for Imperial Valley Planning Area only, which is most of Imperial County save for a small stretch of land on the County's eastern end.
** Designation is only for the urban areas within Imperial County. Same attainment status for 24-hour and annual arithmetic mean standards.
*** Designation for the whole of Imperial County except the City of Calexico.
Source: Area Designations and Maps – 2013. California Air Resources Board. October 2018.

On April 30, 2004, Imperial County was classified as a "marginal" nonattainment area for 8-Hour Ozone NAAQS under the FCAA. On March 13, 2008, the USEPA found that Imperial County failed to meet attainment for the 8-Hour Ozone NAAQS by June 15, 2007 and was reclassified as "moderate" nonattainment. However, on November 17, 2009, EPA announced that Imperial County has met the 1997 federal 8-hour ozone standard—demonstrating improved air quality in the area. The announcement is based on three years of certified clean air monitoring data for the years 2006-2008. However, on November 16, 2017 the USEPA designated Imperial County as nonattainment for the 2015 ozone NAAQS.[17]

In response to the opinion of the US Court of Appeals for the Ninth Circuit in Sierra Club v. United States Environmental Protection Agency, et al., in August 2004, the USEPA found that the Imperial Valley PM_{10} nonattainment area had failed to attain by the moderate area attainment date of December 31, 1994, and as a result reclassified under the FCAA the Imperial Valley from a moderate to a serious PM_{10} nonattainment area. Also, in August 2004, the USEPA proposed a rule to find that the Imperial area had failed to attain the annual and 24-hour PM_{10} standards by the serious area deadline of December 31, 2001. The USEPA finalized the rule on December 11, 2007, citing as the basis for the rule that six Imperial County monitoring stations were in violation of the 24-hour standard during 1999-2001. The USEPA's final rule action requires the state to submit to the USEPA by December 11, 2008 (within one year of the rule's publication in the Federal Register) an air quality

17 California – Final Area Designations for the 2015 Ozone National Ambient Air Quality Standards, Technical Support Document. United States Environmental Protection Agency. November 16, 2017.

plan that demonstrates that the County will attain the PM_{10} standard as expeditiously as practicable. The County is in the process of requesting designation of attainment for PM_{10}.[18]

On November 13, 2009, EPA published Air Quality Designations for the 2006 24-Hour Fine Particle ($PM_{2.5}$) National Ambient Air Quality Standards[19] wherein Imperial County was listed as designated nonattainment for the 2006 24-hour $PM_{2.5}$ NAAQS. On April 10, 2014, the ARB Board gave final approval to the 2013 Amendments to Area Designations for CAAQSs. For the state $PM_{2.5}$ standard, effective July 1, 2014, the Calexico area was designated nonattainment, while the rest of the SSAB was designated attainment. The project lies outside the Calexico nonattainment area.

3.5 Local Air Quality

Ambient air concentrations and historical trends and projections in the project area are documented by measurements made by the ICAPCD and the ARB. Imperial County began its ambient air monitoring in 1976; however, monitoring of ozone began in 1986 at the El Centro monitoring station. Since that time, monitoring has been performed by the ICAPCD, ARB, and private industry. There are six monitoring sites in Imperial County, from Niland to Calexico.

The nearest monitoring station to the project site is in Niland, approximately 4.2 miles north-northeast of the site. The Niland station is located at 7711 English Road and only monitors ozone and PM_{10}. The nearest site that monitors $PM_{2.5}$ is in Brawley, approximately 11.7 miles south of the site. **Table 3.5-1** summarizes 2016 through 2018 published monitoring data from the ARB's Aerometric Data Analysis and Management System (iADAM) for the project vicinity.[20]

The monitoring data show that the Niland Station did not exceed any federal or state ozone standard in all three years. State and federal PM_{10} standards were exceeded at the Niland Station and the federal $PM_{2.5}$ standard was exceeded at the Brawley Station for all three years. It should be noted that some extreme data values presented in iADAM may be Fire data[21] presented by the CDFFA.

18 Letter from Curtis Blondell, Environmental Coordinator, Imperial County Air Pollution Control District, El Centro, CA to Jim Minnick, Planning & Development Services Director, County of Imperial, El Centro, CA. December 11, 2018.

19 Air Quality Designations for the 2006 24-Hour Fine Particle ($PM_{2.5}$) National Ambient Air Quality Standards. United States Environmental Protection Agency. Federal Register. Vol. 74, No. 218. November 13, 2009.

20 iADAM Air Quality Data Statistics. California Air Resources Board. http://www.arb.ca.gov/adam/welcome.html. Accessed August 2019.

21 Incident Archive. California Department of Forestry and Fire Protection. https://www.fire.ca.gov/incidents/. Accessed August 2019.

Table 3.5-1
AMBIENT CRITERIA POLLUTANT CONCENTRATION DATA FOR PROJECT VICINITY

Air Pollutant	Standard/Exceedance	2016	2017	2018
Ozone (O_3) – Niland	Max. 1-hour Concentration (ppm)	0.079	0.072	0.060
	Max. 8-hour Concentration (ppm)	0.066	0.061	0.055
	# Days > Federal 8-hour Std. of 0.070 ppm	0	0	0
	# Days > California 1-hour Std. of 0.09 ppm	0	0	0
	# Days > California 8-hour Std. of 0.070 ppm	0	0	0
Respirable Particulate Matter (PM_{10}) - Niland	Max. 24-hour Concentration (µg/m³)	**255.7**	**345.8**	**331.5**
	#Days > Fed. 24-hour Std. of 150 µg/m³	1	4	11
	#Days > California 24-hour Std. of 50 µg/m³	14	ND	ND
	Annual Average(µg/m³)	**40.9**	**36.3**	**47.3**
Fine Particulate Matter ($PM_{2.5}$) - Brawley	Max. 24-hour Concentration (µg/m³)	**57.9**	**46.1**	**55.1**
	State Annual Average (µg/m³)	11.3	9.4	10.4
	#Days > Fed. 24-hour Std. of 35 µg/m³	2	1	2
	Federal Annual Average (µg/m³)	11.2	9.4	10.4

Source: California Air Resources Board, "iADAM Air Quality Data Statistics." Internet URL: http://www.arb.ca.gov/adam/ (October 2018)
Bold Potential exceedances (not official pending further processing for extreme events)
ND There were insufficient (or no) data available to determine the value.

4.0 AIR QUALITY IMPACTS ANALYSIS

This analysis was prepared in accordance with the ICAPCD CEQA Air Quality Handbook and with Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Air quality impacts are typically divided into short-term and long-term impacts. Short-term impacts are associated with construction activities, such as site grading, excavation and building construction of a project. Long-term impacts are associated with the operation of a project upon its completion.

4.1 CEQA Impact Review Criteria

In accordance with *State CEQA Guidelines* Appendix G, implementation of the project would result in a potentially significant impact if it were to:

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

Where available, the significance criteria established by the applicable air quality management district (AQMD) or air pollution control district (APCD) may be relied upon to make the significance determinations. As will be discussed in the next section, the ICAPCD has developed a CEQA Air Quality

Handbook to provide a protocol for air quality analyses that are prepared under the requirements of CEQA.

4.2 Imperial County APCD Thresholds of Significance

Under the ICAPCD guidelines, an air quality evaluation must address the following:

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

4.2.1 Construction Impacts

As will be discussed in **Section 4.5.2**, this is a "Tier I" project. In general, projects whose *operational* emissions qualify them as Tier I do not need to quantify their construction emissions; instead they adopt the standard mitigation measures for construction (**See Section 6.1**). The CEQA Guidelines states the "approach of the CEQA analyses for construction particulate matter impacts should be qualitative as opposed to quantitative."

4.2.2 Operational Impacts

To evaluate long-term air quality impacts due to operation of a project, the ICAPCD recommends the significance criteria shown in **Table 4.2-1.**

Table 4.2-1
THRESHOLDS OF SIGNIFICANCE FOR PROJECT OPERATIONS[22]

Pollutant	Emissions (lbs/day)	
	Tier I	Tier II
Carbon Monoxide (CO)	< 550	≥ 550
Reactive Organic Gases (ROG)	< 137	≥ 137
Nitrogen Oxides (NO_X)	< 137	≥ 137
Sulfur Oxides (SO_X)	< 150	≥ 150
Particulate Matter (PM_{10})	< 150	≥ 150
Particulate Matter ($PM_{2.5}$)	< 550	≥ 550
Level of Significance	Less Than Significant	Significant Impact
Level of Analysis	Initial Study	Comprehensive Air Quality Report
Environmental Document	Negative Declaration	Mitigated Negative Declaration or Environmental Impact Report

22 Imperial County Air Pollution Control District. 2017. CEQA Air Quality Handbook. November, p. 10.

4.3 CO "Hotspots" Thresholds

Exhaust emissions from motor vehicles can potentially cause a direct, localized hotspot impact at or near proposed developments or sensitive receptors. The optimum condition for the occurrence of a CO hotspot would be cool and calm weather at a congested major roadway intersection with sensitive receptors nearby, and where vehicles are idling or moving at a stop-and-go pace.

The significance of localized project impacts depends on whether project-related emissions result in a violation of state and/or federal CO standards. A significant impact would occur if the CO hotspot analysis of vehicular intersection emissions exposes sensitive receptors to concentrations that are more than the following thresholds:

- 20 parts per million (ppm) for 1-hour average, and/or
- 9 ppm for 8-hour average.

The ICAPCD *CEQA Air Quality* Handbook does not specify criteria for significance when ambient CO levels already exceed a state or federal standard. For that case, we used the South Coast Air Quality Management District's specification that project impacts are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more.[23]

4.4 Methodology

Regional and local emissions of criteria air pollutants and precursors, and GHGs during project operations were assessed in accordance with the methodologies described below. ICAPCD suggests that the "approach of the CEQA analyses for construction PM_{10} impacts should be qualitative as opposed to quantitative"[24] but that any projects which are greater than the level of significance for construction may have a significant impact on local and, under certain circumstances, regional air quality. This analysis does not include construction PM_{10}.

Operational emissions were estimated for employees and hauling trucks using methodologies incorporated in the widely used and recommended California Emissions Estimator Model® (CalEEMod)[25,26] and presented in **Attachment 1.**

4.5 Air Quality Impacts

4.5.1 Short-Term Impacts

Project construction activities will generate short-term air quality impacts. Project construction is estimated to take 18 months. The starting date is unknown as of this writing. For evaluation purposes, it is estimated to be early January 2020. The major construction phases, some of which will be at least partially concurrent, will be clearing of existing crop cover; site grading; excavation of runoff storage pond; grading of perimeter road and feed alleys; laying of road base; and construction of confinement pens that will be used to house an additional 30,000 head of cattle.

23 South Coast Air Quality Management District. 1993. CEQA Air Quality Handbook. April.
24 CEQA Air Quality Handbook: Guidelines for the Implementation of the California Air Quality Act of 1970, and amended. Imperial County Air Pollution Control District, November 2007.
25 California Emission Estimator Model (CalEEMod)®, Version 2016.3.2. California Air Pollution Control Officers Association. November 2017.
26 The CalEEMod software itself was not used.

Use of diesel-fueled construction equipment such as excavators and graders will result in exhaust emissions of criteria pollutants and air toxics (mainly diesel particulate matter) and will generate fugitive dust emissions.

However, since the project proponent must comply with all the requirements of the ICAPCD's rules and regulations, specifically those of Regulation VIII, which applies to any activity or man-made condition capable of generating fugitive dust and requires the use of reasonably available control measures to suppress fugitive dust emissions, the impact will be less than significant.

4.5.2 Long-Term Impacts

4.5.2.1 Mobile Sources

The project will generate long-term air quality impacts associated with the exhaust emissions from increased truck traffic and employee commuting. Emission factors for employee vehicles and trucks were obtained from the EMFAC2017 Web Database[27] for Imperial County in calendar year 2019. In addition to generating exhaust emissions, the vehicles generate fugitive dust emissions by causing silt on roadways to become entrained in the air. The ICAPCD assumes that 50 percent of travel in Imperial County is on unpaved roads. Estimated unmitigated emissions from mobile sources are shown in **Table 4.5-1.** Detailed calculations are provided in **Attachment 1.**

Table 4.5-1
DAILY PROJECT OPERATIONAL MOBILE EMISSIONS (UNMITIGATED)

Emissions Source	Pollutant (maximum lbs/day)				
	ROG	CO	NO_X	PM_{10}	$PM_{2.5}$
Exhaust from Incoming Stock Trucks	0.03	0.16	0.87	0.22	0.18
Exhaust from Outgoing Stock Trucks	0.03	0.15	0.83	0.21	0.17
Exhaust from Feed Supply Trucks	0.00	0.00	0.02	0.01	0.00
Exhaust from Employee Vehicles	0.00	0.30	0.02	0.01	0.01
Entrained Road Dust	–	–	–	206.5	20.0
Max Daily Emissions	**0.1**	**0.6**	**1.7**	**207.0**	**20.4**
Thresholds for Tier II	*137*	*550*	*137*	*150*	*550*
Tier	**I**	**I**	**I**	**II**	**I**

Source: Calculated by OB-1 Air Analyses.

As indicated in **Table 4.5-1**, the project would generate mobile source operational PM_{10} emissions that would exceed the corresponding ICAPCD threshold for Tier II. To ensure that PM_{10} emissions are reduced to a less than significant level, mitigation measure **MM AQ-1** (see **Section 6.1**) will be implemented.

Mitigated emissions are shown in **Table 4.5-2**. After implementation of **MM AQ-1**, emissions of all criteria pollutants will be less than significant.

27 EMFAC2017 Web Database. California Air Resources Board. (https://www.arb.ca.gov/emfac/2017/). Accessed August 2019.

Table 4.5-2
DAILY PROJECT OPERATIONAL MOBILE EMISSIONS (MITIGATED)

Emissions Source	Pollutant (maximum lbs/day)				
	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$
Exhaust from Incoming Stock Trucks	0.03	0.16	0.87	0.22	0.18
Exhaust from Outgoing Stock Trucks	0.03	0.15	0.83	0.21	0.17
Exhaust from Feed Supply Trucks	0.00	0.00	0.02	0.01	0.00
~~Exhaust from Employee Vehicles~~	~~0.00~~	~~0.30~~	~~0.02~~	~~0.01~~	~~0.01~~
Entrained Road Dust	–	–	–	74.2	5.23
Max Daily Emissions	**0.1**	**0.6**	**1.7**	**74.7**	**5.6**
Thresholds for Tier II	*137*	*550*	*137*	*150*	*550*
Tier	**I**	**I**	**I**	**I**	**I**

4.5.2.2 Stationary Sources

The project would fit the definition of a large confined animal facility (LCAF)[28] pursuant to requirements set out in SB 700. ARB has defined beef cattle LCAFs as any facility in an ozone nonattainment area "that maintains on any one day" 3,500 or more beef cattle and 7,000 or more beef cattle in attainment areas.[29] As such, the project would be subject to ICAPCD Rule 217 and require an ATC/PTO.

4.5.2.3 PM_{10}

LCAFs can contribute directly to primary PM_{10} through several mechanisms, including animal activity, animal housing fans, and air entrainment of mineral and organic material from soil, manure, and water droplets generated by high-pressure liquid sprays. Whereas the main purpose of Rule 217 is to reduce to limit emissions of VOC's and ammonia from LCAFs, to get an ATC an LCAF must submit a dust control plan that the Air Pollution Control Officer (APCO) believes is reasonably designed to effectively control dust. Therefore, required compliance with Rule 420 would reduce the impacts of fugitive dust to less than significant.

4.5.2.4 VOCs and Ammonia (NH_3)

The nitrogen in animal manure can be converted to NH_3 and be emitted in large quantities from animal housing and manure management systems and is an indirect precursor to the greenhouse gas nitrous oxide (N_2O) emissions as well as an environmental concern. NH_3 can contribute to reduced air quality when it reacts with SO_2 or NO_2 in the atmosphere to form ammonium sulfate and ammonium nitrate, respectively; both are forms of $PM_{2.5}$. In addition, animal manure emits VOCs through the processes of anaerobic and aerobic decomposition. Through the ICAPCD's permitting process, emissions of VOC and NH_3 will be reduced and controlled to the extent feasible; therefore, impacts related to the project's VOC and NH_3 emissions are considered less than significant. Cumulative impacts of ammonia emissions are discussed in **Section 4.5.6.**

28 Final Statement of Reasons for Rulemaking for Large Confined Animal Facility Definition. California Air Resources Board. Adopted June 23, 2005.

29 Title 17, California Code of Regulations, Division 1, Chapter 1, Subchapter 2.7, commencing with section 86500.

4.5.3 Sensitive Receptors

Sensitive receptors are persons who would be more susceptible to air pollution than the general population, such as children, athletes, the elderly, and the chronically ill. Examples of land uses where substantial numbers of sensitive receptors are often found are schools, daycare centers, parks, recreational areas, medical facilities, nursing homes, and convalescent care facilities. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended times, resulting in sustained exposure to pollutants. The closest sensitive receptor to the project site currently is a rural residence about 0.9 mile to the southeast. (See **Figure 3.1-1.**) The nearest school is Calipatria High School, located at 601 W Main St, Calipatria, about 2.5 miles southeast of the project.

4.5.4 Objectionable Odors

Odor implications of NH_3 are localized to regions near the LCAF. NH_3 is easily recognized by its smell but is seldom associated with nuisance odor complaints near LCAFs any more than other manure constituents such as cresols, sulfides, or volatile fatty acids. NH_3 readily disperses from open-lot feed yards, which helps reduce its odor intensity to below human detection thresholds. NH_3 odors tend to be more noticeable inside animal barns than in open lots[30] and are greater on or near LCAFs than at more distant offsite locations.[31]

4.5.5 Conformity with Air Quality Management Plan

The ICAPCD *CEQA Air Quality Handbook* calls for a consistency analysis with the regional clean air plans, namely ozone and PM_{10} attainment demonstration plans, for large residential and commercial developments that are required to develop an EIR. Projects that are projected to exceed ICAPCD thresholds of significance for its operations are considered large developments and are required to demonstrate consistency with regional air quality plans.

4.5.6 Cumulative Impacts of Ammonia Emissions

Cattle feeding is a major agricultural activity in Imperial County, although it has declined in recent years. In 2017, almost 350,000 head of cattle, having a gross value of about $387 million, were raised in feedlots in the county.[32] In combination, the many feedlots potentially emit a significant amount of ammonia. Besides being an air pollutant itself, NH_3 is a precursor to the criteria pollutant $PM_{2.5}$. However, as discussed in **Section 3.3.5**, all feedlots above a certain size must comply with ammonia mitigation measures prescribed by Rule 217 and must obtain a permit to operate from the ICAPCD and. The ICAPCD would not issue a permit to operate to a facility whose operations are not compatible with air quality management plans.[33] Cumulative NH_3 emissions from the proposed new

30 For odor generation and dispersal, an open lot and a large confined animal facility (LCALF) are equivalent.

31 Ammonia Emissions from Cattle Feeding Operations. Sharon L. M. Preece, N. Andy Cole, Richard W. Todd, and Brent W. Auvermann. December 2012. https://aglifesciences.tamu.edu/baen/wp-content/uploads/sites/24/2017/01/E-632.-Ammonia-Emissions-from-Cattle-Feeding-Operations.pdf.

32 2017 Imperial County Agricultural Crop and Livestock Report. Office of the Agricultural Commissioner. July 10, 2018. https://www.co.imperial.ca.us/ag/docs/spc/crop_reports/2017_Imperial_County_Crop_and_Livestock_Report.pdf.

33 Personal communication from Monica Soucier, Imperial County Air Pollution Control District, El Centro, CA to Michael Rogozen, UltraSystems Environmental, Inc, Irvine, CA and Matthew Harmon, DuBose Design Group, El Centro, CA. January 23, 2019.

Moiola facility, along with those of the other feedlots in the county, would not be cumulatively significant.

5.0 GREENHOUSE GAS EMISSIONS ANALYSIS

5.1 Climate Change and Greenhouse Gases

If the earth had no atmosphere, almost all of the energy received from the sun would be re-radiated out into space. Our atmosphere helps retain a major portion of the solar radiation through "the greenhouse effect." Short-wavelength solar radiation passes through the atmosphere and is absorbed by the earth's surface. The earth re-radiates the heat up into the atmosphere, at a longer wavelength. GHG in the atmosphere absorb the longer-wavelength heat and then radiate it back downward. In general, as concentrations of GHG in the atmosphere increase, global temperatures increase.

For many centuries, atmospheric GHG concentrations were relatively stable. As combustion of fossil fuels for industrial activities and transportation increased, concentrations of CO_2 in the atmosphere increased dramatically. The result has been an observed increase in average global temperature. The current consensus among scientists is that continued increases in atmospheric GHG will not only raise the average global temperature but will also lead to changes in climate. While air temperatures will mainly rise, temperatures may decrease in some areas. Rainfall distribution and storm patterns will be affected. As polar ice melts, sea levels may rise, inundating coastal areas.

GHG is defined under the California Global Warming Solutions Act of 2006 (AB 32) as CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC) and sulfur hexafluoride (SF_6). Associated with each GHG species is a "global warming potential" (GWP), which is defined as the ratio of degree of warming to the atmosphere that would result from the emission of one mass unit of a given GHG compared with one equivalent mass unit of CO_2 over a given period of time. By this definition, the GWP of CO_2 is always 1. The GWP of CH_4 and N_2O are 25 and 298, respectively.[34] "carbon dioxide equivalent" (CO_2e) emissions are calculated by weighting each GHG compound's emissions by its GWP and then summing the products.

Carbon dioxide (CO_2) is a clear, colorless, and odorless gas. Fossil fuel combustion is the main human-related source of CO_2 emissions; electricity generation and transportation are first and second in the amount of CO_2 emissions, respectively. Carbon dioxide is the basis of GWP, and thus has a GWP of 1.

Methane (CH_4) is a clear, colorless gas, and is the main component of natural gas. Anthropogenic sources of CH_4 are fossil fuel production, biomass burning, waste management, and mobile and stationary combustion of fossil fuel. Wetlands are responsible for the majority of the natural methane emissions.[35] As mentioned above, CH_4, within a 100-year period, is 25 times more effective in trapping heat than is CO_2.

Nitrous oxide (N_2O) is a colorless, clear gas, with a slightly sweet odor. N_2O has both natural and human-related sources, and is removed from the atmosphere mainly by photolysis, or breakdown by sunlight, in the stratosphere. The main human-related sources of N_2O in the United States are

34 Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. 2007.

35 U.S. Environmental Protection Agency, "Methane." Climate Change Web Site. Internet URL: http://www.epa.gov/methane/. Updated April 1, 2011.

agricultural soil management (synthetic nitrogen fertilization), mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production.[36] Nitrous oxide is also produced from a wide range of biological sources in soil and water. Within a 100-year span, N_2O is 298 times more effective in trapping heat than is CO_2.[37]

5.2 Regulatory Background

5.2.1 Federal Climate Change Regulation

The federal government has been involved in climate change issues at least since 1978, when Congress passed the National Climate Program Act (92 Stat. 601), under authority of which the National Research Council prepared a report predicting that additional increases in atmospheric CO_2 would lead to non-negligible changes in climate. At the "Earth Summit" in 1992 in Rio de Janeiro, President George H.W. Bush signed the United Nations Framework Convention on Climate Change (UNFCCC), a nonbinding agreement among 154 nations to reduce atmospheric concentrations of carbon dioxide and other greenhouse gases. The treaty was ratified by the U.S. Senate. However, when the UNFCCC signatories met in 1997 in Kyoto, Japan, and adopted a protocol that assigned mandatory targets for industrialized nations to reduce greenhouse gas emissions, the U.S. Senate expressed its opposition to the treaty. The Kyoto Protocol was not submitted to the Senate for ratification.

The federal government is taking several steps to address the challenge of climate change. The USEPA collects several types of GHG emissions data. These data help policy makers, businesses, and USEPA track GHG emissions trends and identify opportunities for reducing emissions and increasing efficiency. USEPA has been collecting a national inventory of GHG emissions since 1990 and in 2009 established mandatory reporting of GHG emissions from large GHG emissions sources.

The United States Department of Agriculture (USDA) is taking steps to create modern solutions to the challenge of climate change. They have identified the real threat changing climate poses to U.S. agricultural production, forest resources, and rural economies. These threats have significant implications not just for farmers, ranchers, and forest landowners, but for all Americans. Land managers across the country are already feeling the pressures of a changing climate and its effects on weather. As these risks continue and amplify, producers will be faced with the challenges of adapting.

To mitigate climate-related risks, USDA has established seven regional hubs[38] for risk adaptation and mitigation to climate change. These Hubs will deliver science-based knowledge and practical information to farmers, ranchers and forest landowners on a regional basis to support decision-making related to changing climate.

36 U.S. Environmental Protection Agency, "Nitrous Oxide." Climate Change Web Site. Internet URL: http://www.epa.gov/nitrousoxide/. Updated June 22, 2010.
37 Ibid.
38 USDA Climate Hubs Webpage, United States Department of Agriculture. https://www.climatehubs.oce.usda.gov/.

5.2.2 California Climate Change Regulation

Since 2005, through legislation, regulations, and executive orders, the State of California has actively pursued a goal of substantially reducing public and private sector GHG emissions in the state. The following are the major actions taken to date.

Executive Order S-3-05 (GHG Emissions Reductions). Executive Order #S-3-05, signed by Governor Arnold Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80% reduction in GHG emissions to below 1990 levels by 2050.

The California Global Warming Solutions Act of 2006 (AB 32). In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Global Warming Solutions Act of 2006 (Health and Safety Code § 38500 et seq.), into law. AB 32 was intended to effectively end the scientific debate in California over the existence and consequences of global warming. In general, AB 32 directs the ARB to do the following:

- On or before June 30, 2007, publicly make available a list of discrete early action GHG emission reduction measures that can be implemented prior to the adoption of the statewide GHG limit and the measures required to achieve compliance with the statewide limit.
- By January 1, 2008, determine the statewide levels of GHG emissions in 1990, and adopt a statewide GHG emissions limit that is equivalent to the 1990 level (an approximately 25% reduction in existing statewide GHG emissions).
- On or before January 1, 2010, adopt regulations to implement the early action GHG emission reduction measures.
- On or before January 1, 2011, adopt quantifiable, verifiable, and enforceable emission reduction measures by regulation that will achieve the statewide GHG emissions limit by 2020, to become operative on January 1, 2012, at the latest. The emission reduction measures may include direct emission reduction measures, alternative compliance mechanisms, and potential monetary and non-monetary incentives that reduce GHG emissions from any sources or categories of sources as the ARB finds necessary to achieve the statewide GHG emissions limit.
- Monitor compliance with and enforce any emission reduction measure adopted pursuant to AB 32.

On December 11, 2008, the ARB approved the *Climate Change Scoping Plan*[39] pursuant to AB 32. The Scoping Plan recommends a wide range of measures for reducing GHG emissions, including (but not limited to):

- Expanding and strengthening of existing energy efficiency programs.

39 California Air Resources Board, Climate Change Scoping Plan, a Framework for Change, Pursuant to AB32, the California Global Warming Solutions Act of 2006 (December 11, 2008).

- Achieving a statewide renewables energy mix of 33 percent.
- Developing a GHG emissions cap-and-trade program.
- Establishing targets for transportation-related GHG emissions for regions throughout the state, and pursuing policies and incentives to meet those targets.
- Implementing existing state laws and policies, including California's clean car standards, goods movement measures and the Low Carbon Fuel Standard.
- Targeted fees to fund the state's long-term commitment to administering AB 32.

Executive Order S-01-07 (Low Carbon Fuel Standard). Executive Order #S-01-07 (January 18, 2007) establishes a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020 through establishment of a Low Carbon Fuel Standard. Carbon intensity is the amount of CO_2e per unit of fuel energy emitted from each stage of producing, transporting and using the fuel in a motor vehicle. On April 23, 2009 the ARB adopted a regulation to implement the standard.

Senate Bill 97. Senate Bill 97 was signed by the governor on August 24, 2007. The bill required the Office of Planning and Research (OPR), by July 1, 2009, to prepare, develop and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption. On April 13, 2009 OPR submitted to the Secretary for Natural Resources its proposed amendments to the State CEQA Guidelines for greenhouse gas emissions. The Resources Agency adopted those guidelines on December 30, 2009, and they became effective on March 18, 2010. The amendments treat GHG emissions as a separate category of impacts; i.e. they are not to be addressed as part of an analysis of air quality impacts.

Section 15064.4, which was added to the CEQA Guidelines, specifies how the significance of impacts from GHGs is to be determined. First, the lead agency should "make a good faith effort" to describe, calculate or estimate the amount of GHG emissions resulting from a project. After that, the lead agency should consider the following factors when assessing the impacts of the GHG emissions on the environment:

- The extent to which the project may increase or reduce GHG emissions, relative to the existing environmental setting;
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions.

The governor's OPR asked the ARB to make recommendations for GHG-related thresholds of significance. On October 24, 2008, the ARB issued a preliminary draft staff proposal for *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases*

under the California Environmental Quality Act.[40] After holding two public workshops and receiving comments on the proposal, ARB staff decided not to proceed with threshold development.[41] Quantitative significance thresholds, if any, are to be set by local agencies.

Senate Bill 605. Senate Bill 605 was signed into law on September 21, 2014. The bill required the ARB to develop a comprehensive strategy to reduce statewide emissions of short-lived climate pollutants (SLCPs), such as methane. The bill specifically required the ARB to inventory the sources and emissions of these pollutants, identify research gaps, identify existing and potential reduction measures, prioritize the development of new measures, and develop a comprehensive strategy for dealing with SLCPs.

Senate Bill 1383. Senate Bill 1383 was signed into law on September 19, 2016. The bill required the adoption of a comprehensive SLCP Strategy that included SLCP reduction targets, including a 40% reduction in statewide methane emissions below 2013 levels by 2030. The SLCP Strategy, which was adopted by the ARB on March 23, 2017, addresses methane emissions in particular.

5.2.3 Local Significance Thresholds

It is widely recognized that no single project could generate enough GHG emissions to change the global climate temperature noticeably. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, project-specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change.

Since the County of Imperial has not established a threshold of significance for GHGs, the ICAPCD recommends that the significance of GHG emissions from a project be evaluated by determining the extent to which they could practicably be reduced by measures that the state is considering for reducing enteric fermentation and manure management emissions from livestock operations.[42]

5.3 Project Greenhouse Gas Emissions Inventory

The project will cause emissions of GHG from mobile sources, enteric fermentation, and manure management. In addition, elimination of Bermuda grass cultivation from the site will decrease natural carbon sequestration, in effect increasing GHG emissions. Specific details are presented in **Attachment A.**

5.3.1 Mobile Source Emissions

The project's mobile source GHG emissions were determined using the methodologies presented in **Section 4.5.2.1.**

40 California Air Resources Board. Preliminary Draft Staff Proposal. Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act. Planning and Technical Support Division, Sacramento, California (October 24, 2008).

41 Personal communication from Douglas Ito, California Air Resources Board, Sacramento, California, to Michael Rogozen, UltraSystems Environmental Inc., Irvine, California. March 29, 2010.

42 Personal communication from Monica Soucier, APC Division Manager, Imperial County, California, to Joe O'Bannon, OB-1 Air Analyses. November 1, 2018.

5.3.2 Enteric Emissions

The microbial fermentation that occurs in the digestive system of some animals is called enteric fermentation. It is a normal digestive process during which microbes break down indigestible carbohydrates and reprocess them into nutrients that can be absorbed by the animal. This microbial fermentation process produces CH_4 as a by-product, which is then exhaled, eructated or passed out as gas by the animal. Among domesticated animal species, ruminants (e.g., cattle, buffalo, sheep, and goats) are the main emitters of CH_4. Emission factors used to estimate NH_3 emissions were obtained from the ARB's GHG inventory methodology.[43]

5.3.3 Emissions from Manure Management

Other major sources of GHG emissions are NH_3 and N_2O related to manure management. Manure is generated on feedlots as a by-product of raising animals. This manure need not be merely a waste product; instead, it is a valuable resource full of nutrients and is treated as such by farmers. Manure has many different uses (e.g., fertilizer, soil amendment, compost feedstock, biogas feedstock, etc.) that can be used individually or in combination depending on the farm and types of potential beneficial end uses. It can be applied as a liquid or a solid to onsite fields to meet crop nutrient needs; or it can be transported offsite to meet crop nutrient needs at a different facility, among other options. The beneficial use of the manure is very site-specific and may vary from farm to farm. Emission factors for NH_3 and N_2O were obtained from the ARB's GHG inventory methodology.

5.3.4 Total Unmitigated Greenhouse Gas Emissions

Table 5.3-1 gives a detailed breakdown of the results of the GHG emissions analysis.

Table 5.3-1
UNMITIGATED ANNUAL GHG EMISSIONS 2018 AND BEYOND
(Emissions in tonnes)

Source	GHG (tonnes)			
	CO_2	CH_4	N_2O	CO_2e
Mobile Emissions	179.9	0.001	0.026	188
Enteric Emissions	---	1,260	---	31,502
Emissions from Manure Management	---	65.13	59.73	19,428
Annual Totals	**180**	**1,325**	**59.8**	**51,118**

43 Documentation of California's Greenhouse Gas Inventory -11th Edition. California Air Resources Board. Last updated June 22, 2018. https://www.arb.ca.gov/cc/inventory/doc/doc_index.php.

5.4 Impact Analysis

UltraSystems used the following factors from § 15064.4(b) of the CEQA Guidelines to assess the significance of impacts from greenhouse gas emissions on the environment:[44]

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

5.4.1 Increase in Greenhouse Gas Emissions

As seen in **Table 5.3-1**, the project will generate about 51,118 tonnes per year of CO_2e emissions, primarily of CH_4 and N_2O from enteric and manure management sources.

In the first AB 32 Scoping Plan,[45] CH_4 and N_2O emissions from the agricultural sector were addressed only through voluntary measures and suggestions for further research, such as manure digester systems at dairies and fertilizer N_2O emissions. The 2014 First Update[46] to the Scoping Plan expanded on the agricultural strategies but singled out short-lived climate pollutants (SLCPs), such as black carbon, CH_4, and some HFCs, since their relatively short lifetimes but inordinate contributions to climate forcings[47] from anthropogenic sources would produce more immediate effect when mitigated. In California, the largest anthropogenic sources of CH_4 are enteric fermentation (belching by animals), manure management, landfills, natural gas transmission, and wastewater treatment. Enteric fermentation and manure management contribute 29% and 26% of total California CH_4 emissions, respectively.

In 2017 the ARB proposed a strategy that lays out a range of options to accelerate SLCP emission reductions in California, including regulations, incentives, and other market-supporting activities to address SLCPs.[48] Reductions in enteric fermentation and manure management emissions are recommended as further actions and are actively being pursued technologically and legislatively. Senate Bill (SB) 1383 directs the ARB to develop a manure management strategy that will reduce dairy and livestock sector methane emissions by up to 40 percent from 2013 levels by 2030. Reduction measures from manure management being considered by the ARB, the California Department of Food and Agriculture (CDFA), and stakeholders include switching from flush water lagoon systems; pasture-based dairy management; and installing anaerobic digestion systems. SB 1383 requires the state to support efforts to accelerate project development and help the industry reduce emissions before regulatory requirements take effect, such as to support improved manure management practices through financial incentives, collaboration to overcome barriers, and other market support. Strategies that have been investigated to reduce enteric fermentation include increasing production efficiencies to reduce the amount of methane produced for a given amount of

44 CEQA Guidelines §§ 15064.4(b)(1) through 15064.4(b)(3).
45 Climate Change Scoping Plan; a framework for change. California Air Resources Board. December 2008.
46 First Update to the Climate Change Scoping Plan: Building on the Framework. California Air Resources Board. May 2014.
47 "Climate forcings" are defined by the Environmental Literacy Council (https://enviroliteracy.org), as "processes within our atmosphere that can force changes in climate include changes in ocean circulation or in the composition of the atmosphere."
48 Short-Lived Climate Pollutant Reduction Strategy. California Air Resources Board. March 14, 2017.

product, breeding animals for lower methane production, gut microbial interventions, and changes to nutrition and animal management.

The science and technological and economic feasibility of the above-mentioned measures are in the early stages of development and industry stakeholders are active participants in the process. In fact, some mitigation will be implemented through the ICAPCD permitting process, with an Emissions Mitigation Plan that would demonstrate that the facility would reduce emissions of VOCs and NH_3. The Plan could also affect the GHG emissions related to manure management and enteric emissions. Feed mitigation measures could improve the quality of the food, lessening the quantity of enteric emissions. Animal housing mitigation could be effective in reducing the GHG emissions from manure.

Additionally, the applicant currently practices manure management with the composting operations located in the existing operation area and the project will be added to the operations.

5.4.2 Compliance with Greenhouse Gas Reduction Plans

There are currently no regional or local climate action plans or general or specific plan provisions to reduce GHG emissions in the study area.

6.0 MITIGATION MEASURES

6.1 Standard Mitigation Measures for Construction

Attachment 2 contains the standard mitigation measures for construction emissions recommended in the ICAPCD's CEQA Air Quality Handbook.

6.2 Mitigation for Criteria Pollutant Impacts

MM AQ-1 The operator will require that cattle trucks drive only on paved roads when they are driving between feedlots. They may drive on unpaved surfaces within feedlots to the extent necessary for delivery, loading and unloading.

6.3 Mitigation for Climate Change Impacts

None available, other than GHG emission reductions resulting from implementation of permit conditions based upon Rule 217 requirements.

ATTACHMENTS

ATTACHMENT 1

EMISSION CALCULATION DETAILS

Project GHG Emissions

Source	GHG (tonnes/year)			
	CO_2	CH_4	N_2O	CO_2e
Mobile Emissions	179.9	0.001	0.026	188
Enteric Emissions	0	1,260	0	31,502
Emissions from Manure Management	0	65.13	59.73	19,428
Annual Totals	**180**	**1325.2**	**59.8**	**51,117**

ARB GHG Emission Inventory Emission Factors

(grams per head of cattle)

Sector	Activity	CH_4	N_2O
3A1 - Enteric Fermentation	Livestock population - Steer feedlot	42,002	0
3A2 - Manure Management	Dry Lot - Feedlot steers 500+ lbs	2,171	1,991

Project Size = 30.000 head

Criteria Emissions Summary

Unmitigated

Emissions Source	Pollutant (maximum lbs/day)				
	ROG	CO	NO_X	PM_{10}	$PM_{2.5}$
Trucks incoming transport	0.03	0.16	0.87	0.22	0.18
Trucks outgoing transport	0.03	0.15	0.83	0.21	0.17
Trucks feed supply	0.00	0.00	0.02	0.01	0.00
Employees	0.00	0.30	0.02	0.01	0.01
Entrained Road Dust	-	-	-	206.5	20.0
Max Daily Emissions	**0.1**	**0.6**	**1.7**	**207.0**	**20.3**

Mitigated

Emissions Source	Pollutant (maximum lbs/day)				
	ROG	CO	NO_X	PM_{10}	$PM_{2.5}$
Trucks stock transport	0.03	0.16	0.87	0.22	0.18
Trucks feed supply	0.03	0.15	0.83	0.21	0.17
Employees	0.00	0.00	0.02	0.01	0.00
Entrained Road Dust	-	-	-	74.23	5.23
Max Daily Emissions	**0.1**	**0.3**	**1.7**	**74.7**	**5.6**

Operational On-road Emissions

Activity

Expanded Activity	# Vehicles per Day	1 way Trip Length	VMT per day	VMT per year
Trucks incoming transport *	3	35	210	113,880
Trucks outgoing transport	10	10	200	62,571
Trucks feed supply	10	0.25	5	1,564
Employees	4	18.3	146	45,677
TOTAL	***27***		***561***	***223,693***

** Daily VMT based on round trip worst-case scenario of 3 trucks per week all occuring on same day, travel mileage in Imperial Co only. Annual VMT basd on three 3 trucks per week traveling 365 miles from and to Tulare Californa (3 x 326 x 52 x 2)*

Criteria Emissions

Expanded Activity	Pounds per day				
	ROG	CO	NO_X	PM_{10}	$PM_{2.5}$
Trucks incoming transport	0.03	0.16	0.87	0.22	0.18
Trucks outgoing transport	0.03	0.15	0.83	0.21	0.17
Trucks feed supply	0.00	0.00	0.02	0.01	0.00
Employees	0.00	0.30	0.02	0.01	0.01
Totals	***0.1***	***0.6***	***1.7***	***0.5***	***0.4***

GHG Emissions

Expanded Activity	Tonnes per Year			
	CO_2	CH_4	N_2O	CO_2e
Trucks incoming transport	106.63	0.0004	0.0168	111.6
Trucks outgoing transport	58.59	0.0002	0.0092	61.3
Trucks feed supply	1.46	0.0000	0.0002	1.5
Employees	13.23	0.0002	0.0003	13.3
Totals	***179.9***	***0.001***	***0.026***	***187.8***

EMFAC2017 (v1.0.2)

2022 Estimated Annual Emission Rates

EMFAC2011 Vehicle Categories

Imperial COUNTY

Vehicle Info			Emission Factor (grams/mile)											
Type	Fuel	VMT	ROG	CO	NO_x	PM_{10}			$PM_{2.5}$			CO_2	CH_4	N_2O
						Exhaust	TW+BW	Total	Exhaust	TW+BW	Total			
LDA	GAS	5,743,563	0.0100	0.7283	0.0425	0.0013	0.0448	0.0462	0.0012	0.0178	0.0191	270.2	0.0026	0.0047
LDA	DSL	53,970	0.0149	0.1769	0.0963	0.0094	0.0448	0.0582	0.0089	0.0178	0.0306	190.2	0.0007	0.0299
LDT1	GAS	618,128	0.0412	1.9451	0.1770	0.0023	0.0448	0.0478	0.0021	0.0178	0.0206	320.0	0.0092	0.0120
LDT1	DSL	267	0.2104	1.2534	1.2610	0.1736	0.0448	0.1592	0.1661	0.0178	0.1273	390.5	0.0098	0.0614
LDT2	GAS	1,918,189	0.0225	1.2211	0.1194	0.0014	0.0448	0.0463	0.0013	0.0178	0.0192	341.6	0.0053	0.0087
LDT2	DSL	12,140	0.0132	0.0997	0.0505	0.0062	0.0448	0.0502	0.0060	0.0178	0.0230	255.1	0.0006	0.0401
Weighted Avg for Employees			***0.0152***	***0.9272***	***0.0705***	***0.0014***	***0.0448***	***0.0465***	***0.0013***	***0.0178***	***0.0193***	***289.7***	***0.0037***	***0.0062***
T6 instate small	DSL	20,696	0.0700	0.3389	1.8746	0.0800	0.1423	0.4842	0.0765	0.0589	0.3860	936.3	0.0033	0.1472

Notes: - Criteria and CO_2 factors come from EMFAC2017 for Candar Year 2022 and represent Estimated Annual Emission Rates for Imperial County

Entrained Road Dust

Entrained road dust emissions are generated by vehicles traveling on both paved and unpaved roads. These equations are based on the paved and unpaved roads emission factors found in Section 5.3 of Appendix A, CalEEMod Users Guide, version 2016.3.2 and AP-42 Sections 13.2.1 and 13.2.2.

Emission Factors - Paved Roads

EF PM_{10} = $[k * (sL^{0.91}) * (W^{1.02})] * (1 - P/4N)$ = 0.00065 lbs PM_{10}/VMT

EF $PM_{2.5}$ = 0.00016 lbs $PM_{2.5}$/VMT

Constant	Description	Value
k =	PM_{10} particle size multiplier for particle size range and units of interest	0.0022
	$PM_{2.5}$ particle size multiplier for particle size range and units of interest	0.00054
sL =	road surface silt loading in g/m^2 (allowable range is 0.02 to 400 g/m^2)	0.1
W =	average weight of the vehicles traveling the road in tons (mean average fleet vehicle weight ranging from 1.5 - 3 tons)	2.4
P =	number of "wet" days with at least 0.01 in)ches of precipitation during the averaging period	35
N =	number of days in the averaging period (e.g., 365 for annual, 91 for seasonal, 30 for monthly)	365

Emission Factors - Unpaved Roads

EF PM_{10} = $(k * (s/12)^1 * (S/30)^{0.5} / (M/0.5)^{0.2} - C) * (1 - P/365)$ = 0.7178 lbs PM_{10}/VMT

EF $PM_{2.5}$ = 0.0715 lbs $PM_{2.5}$/VMT

Constant	Description	Value
k =	PM_{10} particle size multiplier for particle size range and units of interest	1.8
	$PM_{2.5}$ particle size multiplier for particle size range and units of interest	0.18
s =	surface material silt content (%) (allowable range 1.8 - 35 %)	4.3
M =	surface moisture content (%) (allowable range 0.03 – 13 %)	0.5
S =	the average vehicle speed (mph) (allowable range [10 - 55 mph])	40
C =	PM_{10} emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear	0.00047
	$PM_{2.5}$ emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear	0.00036
P =	number of "wet" days with at least 0.254 mm (0.01 in) of precipitation during the averaging period *	13

* Data from Western Regional Climate Center. Brawley Period of Record General Climate Summary - Precipitation. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca1048

Entrained Road Dust Emissions - Operation

Unmitigated

Phase/Category	VMT/d		Paved Roads (lbs/d)		Unpaved Roads (lbs/d)		Total Roads (lbs/d)	
	(paved)	(unpaved)	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
~~Trucks incoming transport~~	~~105~~	~~105~~	~~0.068~~	~~0.017~~	~~75.37~~	~~7.51~~	~~75.44~~	~~7.52~~
Trucks outgoing transport	100	100	0.065	0.016	71.78	7.15	71.84	7.16
Trucks feed supply	1	10	0.000	0.000	6.82	0.04	6.82	0.04
Employees	73	73	0.047	0.012	52.40	5.22	52.45	5.23
Total	**279**	**288**	**0.18**	**0.04**	**206.4**	**19.9**	**206.5**	**20.0**

Notes: Per ICAPCD, vehicular travel in Imperial County is 50% on unpaved roads.
All feed supply trucks are on unpaved roads 95% of the time

Mitigated

Phase/Category	VMT/d		Paved Roads (lbs/d)		Unpaved Roads (lbs/d)		Total Roads (lbs/d)	
	(paved)	(unpaved)	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Trucks incoming transport	200	11	0.129	0.032	7.54	14.26	7.67	14.29
Trucks outgoing transport	190	10	0.123	0.030	7.18	13.58	7.30	13.61
Trucks feed supply	1	10	0.000	0.000	6.82	0.04	6.82	0.04
Employees	73	73	0.047	0.012	52.40	5.22	52.45	5.23
Total	**463**	**103**	**0.30**	**0.07**	**73.9**	**33.1**	**74.2**	**33.2**

Notes: Mitigation is all transport trucks required to drive on paved roads 95% of the time

Travel Distance Assumptions

Truck Mileages

Activity		Imper Co	Total
		1-way	1-way
Calves in	Tulare, CA	35	360
Cattle out		10	N/A

Truck Mileages

Activity	1-way
Feed Supply	0.5

Feed source from Brandt Farms

Employee Mileages

Source		1-way
75%	Brawley	15
25%	El Centro	28
Weighted Average		***18.25***

ATTACHMENT 2

STANDARD MITIGATION MEASURES FOR CONSTRUCTION EQUIPMENT AND FUGITIVE PM_{10}

Below are a number of fugitive dust mitigation measures, which have been shown to significantly reduce emissions. The following examples are not considered all inclusive. Use of alternative mitigation measures may also be considered if the appropriate documentation is provided.

In no way does compliance with Regulation VIII, Fugitive Dust Control measures alleviate or otherwise preclude a project from compliance with any and all other applicable laws, ordinances, resolutions, rules, statutes or other local, state or federal regulations or requirements.

REGULATION VIII - FUGITIVE DUST CONTROL MEASURES (Most recently adopted) – All construction sites, regardless of size, must comply with the requirements contained within Regulation VIII. Although compliance with Regulation VIII does not constitute mitigation under the reductions attributed to environmental impacts its main purpose is to reduce the amount of PM_{10} entrained into the atmosphere as a result of anthropogenic (man-made) fugitive dust sources. Therefore, under all preliminary modeling a presumption is made that all projects are in compliance with Regulation VIII.

Standard Mitigation Measures for Fugitive PM_{10} Control

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

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

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

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

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

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

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

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

Discretionary Mitigation Measures for Fugitive PM_{10} Control

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

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

c. Automatic sprinkler system installed on all soil piles

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

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

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

Although the preceding discussion of construction impacts and mitigation measures are primarily focused on PM_{10} emissions from fugitive dust sources, Lead Agencies should also seek to reduce emissions from construction equipment exhaust. Because of the availability of new control devices, required in the manufacturing of PM oxidation catalysts and NOx absorbers, substantial reductions in PM and NOx emissions from diesel engines is achievable. These new retrofit kits and in some cases new original equipment require the use of ultra low sulfur diesel in order to be effective.

Standard Mitigation Measures for Construction Combustion Equipment

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

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

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

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

To help provide a greater degree of reduction of PM emissions from construction combustion equipment the ICAPCD recommends the following enhanced measures.

Enhanced Mitigation Measures for Construction Equipment

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

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

7.2 Standard Mitigation Measures for Project Operations

These standard air quality mitigation measures have been separated according to land use and mitigation type.

According to Table 1, Tier I, projects generating less than 137 lbs/day of NOx or ROG; less than 150 lbs/day of PM_{10} or SOX; or less than 550 lbs/day of CO or $PM_{2.5}$, the Initial Study should require implementation of all the Standard Mitigation Measures in order to help mitigate or reduce the air quality impacts to a level of insignificance. However, simple implementation of the mitigation measures does not guarantee that the project will be insignificant. The insignificance must be determined by the results of the Initial Study.