

**A-1**

**Notice of  
Preparation /  
Public  
Comments  
Received**

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**Imperial County  
Planning & Development Services Department  
NOTICE OF PREPARATION OF DRAFT EIR FOR THE  
GLAMIS SPECIFIC PLAN PROJECT  
NOTICE OF PUBLIC SCOPING MEETING**

The Imperial County Planning & Development Services Department intends to prepare an Environmental Impact Report (EIR) for the proposed Glamis Specific Plan Area Project (Project), as described below. A public scoping meeting for the proposed EIR will be held by the Imperial County Planning & Development Services Department at 6:00 PM on October 29, 2020. The scoping meeting will be held at the Board of Supervisors Chambers, 2<sup>nd</sup> Floor, County Administration Center located at 940 Main Street, El Centro, CA 92243. Comments regarding the scope of the EIR will be accepted at this meeting. Additionally, comments may be sent to the Planning & Development Services Department, 801 Main Street, El Centro, California 92243, attention Jim Minnick, Director.

**SUBJECT:** Glamis Specific Plan Area Project

**BOARD OF SUPERVISORS CONSIDERATION:** Fall 2021.

**PROJECT LOCATION:** The Project Area is located in the unincorporated community of Glamis, a remote area in the central portion of Imperial County. The project site is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea. The Project site is located in Section 33, Range 18 East, Township 13 South within the U.S. Geological Survey (USGS) Glamis, California 7.5-minute topographic quadrangle (assessor parcel numbers [APN] 039-310-017, 039- 310-022, 039-310-023, 039-310-026, 039-310-027, 039-310-029, and 039-310-030).

**PROJECT DESCRIPTION:** The Project Area is contained within the County's designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The GSPA allows for the development of a Specific Plan in accordance with the design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. The proposed Glamis Specific Plan (GSP) would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicles and mobile home parks, and community facilities (Imperial County General Plan Land Use Element).

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

The GSP would consist of eight proposed Planning Areas. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3). Planning Areas 5 and 6 are proposed for designation as Commercial-Recreation 1 (CR-1). Planning Area 7 is proposed for designation as Commercial-Recreation 2 (CR-2). Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation.

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

**DESIGNATED AREA PLAN:** The general area of the Glamis Beach Store is zoned as C-2, while the remainder of the Project Area is zoned as S-2.

**BOARD OF SUPERVISORS DISTRICT:** District 5, Supervisor, Raymond Castillo.

**ANTICIPATED SIGNIFICANT EFFECTS:** The EIR will analyze potential impacts associated with the following: Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Greenhouse Gas Emissions, Hazards/Hazardous Materials, Hydrology/Water Quality, Transportation/Traffic, Tribal Cultural Resources and Utilities and Service Systems.

**COMMENTS REQUESTED:** The Imperial County Planning & Development Services Department would like to know your ideas about the effects this project might have on the environment and your suggestions as to alternatives, mitigation or ways the project may be revised to reduce or avoid any significant environmental impacts. Your comments will guide the scope and content of environmental issues to be examined in the EIR. Your comments may be submitted in writing to: Jim Minnick, Director, Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA 92243. Available project information may be reviewed at [ICPDS.com](http://ICPDS.com). Due to the limits mandated by State law, your response must be sent at the earliest possible date but no later than 35 days after receipt of this notice.

**NOTICE OF PREPARATION REVIEW PERIOD:** October 20, 2020 through November 24, 2020.



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
PHONE (619) 688-6075  
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a California Way of Life.*

**Governor's Office of Planning & Research**

**Nov 24 2020**

**STATE CLEARINGHOUSE**

November 24, 2020

11-IMP-78

PM 41.06

Polaris Glamis Specific Plan  
NOP/DEIR/SCH# 2020100348

Ms. Patricia Valenzuela  
Planner IV  
County of Imperial  
Community Development Department  
Planning and Zoning Division  
1275 West Main Street  
El Centro, CA 92243

Dear Ms. Valenzuela:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Polaris Glamis Specific Plan Notice of Preparation (NOP) Draft Environmental Impact Report (DEIR) (SCH# 2020100348) and for the Draft Initial Study & Environmental Analysis on this project located in Glamis near State Route 78 (SR-78) in Imperial County. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

**Environmental**

Caltrans appreciates the opportunity to comment on this NOP for the Polaris Glamis Specific Plan DEIR. The analysis presented may impact on Caltrans Right-of-Way (R/W) in the future. Future projects should be based upon the changes enacted from the Program EIR have elements and/or mitigation measures change to effect Caltrans R/W, Caltrans would welcome the

opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

### **Traffic Engineering and Analysis**

- In accordance with Senate Bill (SB) 743 public agencies are required to use Vehicle Miles Traveled (VMT) to evaluate transportation impacts associated with development. Please provide a traffic impact study using the Caltrans-Vehicles Miles Traveled-Focused-Transportation Impact Study Guide -May 20, 2020. Provide a Vehicle Miles Traveled (VMT) analysis for the Polaris Glamis Specific Plan Traffic Study. Caltrans guidance on VMT studies for local development has been released for use (Transportation Impact Study Guide, TISG). The TISG details how the Caltrans Local Development-Intergovernmental Review (LD-IGR) program reviews a land-use project's vehicle miles traveled. See <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>
- For additional guidance, Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.
- Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at Glamis Main Street on Figure 8 of the Draft Study & Environmental Analysis of the Glamis Specific Plan dated October 2020.

## **Comments for the Glamis Specific Plan – Draft Initial Study & Environmental Analysis**

Page 7 - Description of Project – There is a brief description of the proposed land uses listed. The report does not account for other land uses that are mentioned in the project trip generation. Please revise the project trip generation “Table A” (provided by Polaris’ Consultant) to include the below development which is mentioned and listed on page 7:

- a) Fuel station, rental facilities, entertainment and hospitality uses, sporting goods stores, adventure center, amusement facilities, movie theater, obstacle courses, fireworks and light display area and racetrack.

Page 43 - Section XVII Transportation/Traffic – Caltrans does not concur that the impacts from the Polaris development will result in Less Than Significant impacts. The full environmental process and determination of impacts under CEQA will describe the project impacts and mitigations.

Page 44 - Discussion c) Less than Significant Impact. Add sentences to mention the Intersection Control Evaluation (ICE) requirements in addition to the proposal of a signal at the intersection.

## **Comments for the Glamis Specific Plan – First Screen Check Draft EIR**

Page 3-1 - Sections 1.0 and 2.0 appear to be missing.

Page 4-2 - Section 4.2 - Proposed Project Section – Paragraph 2 - “This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands.” Does Bureau of Land Management (BLM) support large variety of commercial uses adjoining Federal lands?

Page 4-4 - Hospitality – “With an average annual attendance of 200,000 visitors to the Glamis area.” According to the Visitation Data provided by LLG Engineers, the annual attendance for 2019 was over 600,000 for this area.

Page 4-7 – Section 4.3 - Project Components – “In compliance with CEQA, only those components of the proposed Glamis Specific Plan that would have the

potential to result in potential environmental effects are addressed in this EIR." Impacts to the transportation network need to be addressed as well.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 stated "There are a total of 6 proximate vehicular access points to the project vicinity with a gateway feature on SR-78 (Figure 4-3)". The entire stretch for vehicular access west of the proposed signalized intersection will be required to have a fence installed along SR-78. Justify the need to have additional accesses if the proposed signalized Glamis Mainstreet intersection is not enough for Area 1. Each of these requested accesses will need to be evaluated as they could potentially create illegal crossings of SR-78.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 1 - "There are a total of 6 proximate vehicular access point to the project vicinity with a gateway feature on SR-78 (Figure 4-3)." Clarify the type of gateway and the installation location. Non-essential highway appurtenances like a gateway will need to be 52 feet from the edge of travel way.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 2 - "...To accommodate the anticipated vehicular traffic flow, the applicant has proposed a conceptual intersection plan with proposed cross-sections subject to final design and approval from Caltrans (Figure 4-4)." Any proposed intersection expansion or modification will require an Intersection Control Evaluation (ICE) report as required by the Caltrans Traffic Operations Policy Directive #13-02. Submit an ICE report for the proposed intersection at this intersection for review. Operations Policy Directive #13-02 can be provided upon request.

"The Glamis Specific Plan proposes a transportation concept showing the portion of SR-78 traversing through the project vicinity being expanded from two thru lanes with an ultimate R/W width of 40 feet to a total of five (5) lanes with an ultimate R/W width of 72 feet. The segment of SR-78, west of the proposed intersection would have three easterly lanes - one thru lane, one left turn lane and one right turn lane - and two westerly lanes with one thru lane and an acceleration lane terminating approximately 1,000 feet from the intersection. The segment of SR-78 east of the intersection is of a similar configuration of the western segment with the number of lanes in each direction reversed and the acceleration lane terminating approximately 600 feet from the intersection." This concept proposes a significant level of

expansion of the State Highway System, and close coordination with Caltrans will be required. Caltrans has made no determination on the proposed concepts.

Page 4-8 - Section 4.3.3- Circulation Plan - Paragraph 3 - All proposed accesses along SR-78 for the proposed development Area 1-8 will need to be improved to meet Caltrans latest driveway standards with acceleration and deceleration lane based on the proposed development phasing (safety).

Page 4-11 Circulation Plan - "The project vicinity includes the Sand Highway that runs parallel to SR-78 along the northwestern edge of Planning Area 1." Is there a plan for separating the "Sand Highway" from SR-78 using physical barriers such as K-rail, fencing, or other means?

Please specify location of signs and under whose authority signs will be posted.

Page 4-26 - Table 4-2 "Anticipated Land Use Changes Through 2051/2071. Please include the growth rate used for the proposed traffic ADT in the report. Also, include this future growth volume in the future project traffic trips scenario in the Traffic Impact Analysis (TIA).

Page 4-27 – Section 4.4 Project Phasing - "... the earliest construction beginning in late 2021. No uses would be opened prior to 2022 (opening year). The build-out year would be 2051 /2071." What are the phases of the project to be constructed between 2021 and 2051?

## **Design**

1. The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments.
2. In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances.
3. The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections.
4. Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17.

5. If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation.
6. New access points along the right of way may need to be evaluated based on access controlled guidance.
7. If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the HDM.

### **Hydraulics**

- 1) Provide a letter from the Floodplain Administrator stating that this project has no rise or a letter showing coordination with the Floodplain Administrator.
- 2) Per the draft IS/EA, Page 19, Figure 9 is insufficient:
  - a) Provide existing topographic information with labels (typically 0.1' contours in the desert areas).
  - b) Provide proposed topographic information with labels (typically 0.1' contours in the desert areas).
  - c) Both maps/exhibits must clearly show the drainage patterns along SR-78, which in the current figure is not visible at all.
- 3) Coordinate with Caltrans' Survey Branch to obtain Caltrans R/W and SR-78 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing SR-78.
- 4) Provide information on the maps/exhibits to show how the conceptual offsite drainage will cross the Ted Kipf Road along Sr-78. This is vital as additional runoff discharge coming from the culvert at northeast side of the site will have potential impact to the existing Caltrans drainage inlet located at the southwestern side of the project.
- 5) Hydrology and Hydraulics Study may be required to determine the effect of the proposed project to the existing drainage system in the area.

Ms. Patricia Valenzuela  
November 24, 2020  
Page 7

### **Active Transportation**

- US Bicycle Route System (USBRS) designates SR-78 as part of the “Southern Tier Route” in this area. Cyclists are present and use this road for regional and cross-country trips.
- As the Glamis Specific Plan develops and is implemented, consider how cyclists and off-highway vehicles may interact. Namely when off-highway vehicles take the shoulder of SR-78, where cyclists may be present.
- The document mentions “Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures.” Please specify the locations of sidewalks and bike lanes, and other complete streets elements.

If you have any questions, please contact Mark McCumsey, of the Caltrans LD-IGR Branch, at (619) 985-4957 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

**electronically signed by**

MAURICE EATON, Branch Chief  
Local Development and Intergovernmental Review Branch

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



Governor's Office of Planning & Research

**Nov 20 2020**

## STATE CLEARINGHOUSE

November 20, 2020  
*Sent via email*

Maria Scoville  
Imperial County Planning and Development Services  
801 Main Street  
El Centro, CA 92243  
[mariascoville@co.imperial.ca.us](mailto:mariascoville@co.imperial.ca.us)

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Glamis Specific Plan Project  
State Clearinghouse No. 2020100348

Dear Ms. Scoville:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from Imperial County (County) for the Glamis Specific Plan Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## **PROJECT DESCRIPTION SUMMARY**

The Project Area is located in the unincorporated community of Glamis, a remote area in the central portion of Imperial County. The Project site consists of approximately 143 acres, and is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea.

The Project Area is contained within the County's designated Glamis Specific Plan Area (GSPA), which allows for the development of a Specific Plan in accordance with design criteria, objectives, and policies that are consistent with the County's General Plan Land Use Element. The proposed Glamis Specific Plan (GSP) would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including commercial and retail development, motel accommodations, recreational vehicles and mobile home parks, and community facilities.

The GSP would consist of eight proposed Planning Areas. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3), intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands. Planning Areas 5 and 6 are proposed for designation as Commercial-Recreation 1 (CR-1), intended to allow small scale, low density development of projects such as employee housing, research and development facilities, or RV park. Planning Area 7 is proposed for designation as Commercial-Recreation 2 (CR-2), intended to accommodate recreation-related commercial opportunities and projects that will support the OHV and recreational uses of the area at a higher density and allowable uses than CR-1 but still be limited to specific uses that are less intense and more occasional than those allowed in CR-3. This could include small repair shops, limited housing, or RV park. Planning Area 8 would be rezoned to the County's existing Open Space/Recreation (S-1) designation, which is primarily characterized by low intensity human utilization and small-scale recreation related uses.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

CDFW recommends that the forthcoming DEIR address the following:

### Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009<sup>2</sup>). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point

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<sup>2</sup> Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018<sup>3</sup>).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

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<sup>3</sup> California Department of Fish and Wildlife (CDFW). 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. State of California, Natural Resources Agency. Available for download at: <https://wildlife.ca.gov/Conservation/Plants>

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Alternatives Analysis**

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would “feasibly attain most of the basic objectives of the Project,” and would avoid or substantially lessen any of the Project’s significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a “no project” alternative (CEQA Guidelines § 15126.6[e]).

### **Mitigation Measures for Project Impacts to Biological Resources**

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the project area, including, but not limited to: flat-tailed horned lizard and burrowing owl.
4. *Mitigation*: CDFW considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San*

*Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

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

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

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

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.



## **California Endangered Species Act**

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (Fish & G. Code, § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

## **Lake and Streambed Alteration Program**

Based on review of material submitted with the NOP and review of aerial photography, the Project may be subject to Notification to CDFW pursuant to Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW’s issuance of an LSA Agreement is a “project” subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the

Maria Scoville  
Imperial County  
November 20, 2020  
Page 10 of 11

proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Glamis Specific Plan Project (SCH No. 2020100348) and recommends that Imperial County address the CDFW's comments and concerns in the forthcoming DEIR. If you should have any questions pertaining to the comments provided in this letter, please contact Rose Banks, Environmental Scientist, at [Rose.Banks@wildlife.ca.gov](mailto:Rose.Banks@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
8091B1A9242F49C...

Scott Wilson  
Environmental Program Manager

Maria Scoville  
Imperial County  
November 20, 2020  
Page 11 of 11

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# NATIVE AMERICAN HERITAGE COMMISSION

11/24/2020

October 21, 2020

Governor's Office of Planning &amp; Research

**Oct 23 2020****STATE CLEARINGHOUSE**

Patricia Valenzuela  
Imperial County Planning & Development Services Department  
801 Main Street  
El Centro, CA 92243

**Re: 2020100348, Glamis Specific Plan Project, Imperial County**

Dear Ms. Valenzuela:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a.** A brief description of the project.
  - b.** The lead agency contact information.
  - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
  - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a.** Alternatives to the project.
  - b.** Recommended mitigation measures.
  - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a.** Type of environmental review necessary.
  - b.** Significance of the tribal cultural resources.
  - c.** Significance of the project's impacts on tribal cultural resources.
  - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

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**A-2**

**Environmental  
Initial Study**

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**DRAFT**  
**Initial Study & Environmental Analysis**

**For:**

**Glamis Specific Plan (SP 19-0001)**  
**Zone Change (19-0006)**  
**Conditional Use Permit (#19-0027)**  
**Initial Study (IS) #19-0030)**



*Prepared By:*

**COUNTY OF IMPERIAL**

**Planning & Development Services Department**

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**October 2020**

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## SECTION I. INTRODUCTION

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### A. PURPOSE

This document is a  policy-level;  project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Glamis Specific Plan Project.

### B. CEQA REQUIREMENTS AND THE IMPERIAL COUNTY “GUIDELINES AND REGULATIONS TO IMPLEMENT CEQA AS AMENDED”

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County’s “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), Mitigated Negative Declaration, Negative Declaration, or other environmental document, 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 is 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.

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## **C. INTENDED USES OF INITIAL STUDY**

This Initial Study is an informational document which is 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 prepared for the project will be circulated for a period of 35 days 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**

This Initial Study is organized as described below 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 ENVIRONMENTAL 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.

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**IV. PERSONS AND ORGANIZATION CONSULTED** identifies those persons consulted and involved in preparation of this Initial Study.

**V. REFERENCES** lists bibliographical materials use in the preparation of this document.

**VI. FINDINGS**

**SECTION 4**

**VIII. RESPONSE TO COMMENTS (IF ANY)**

**IX. MITIGATION MONITORING AND REPORTING PROGRAM (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. **Potentially Significant Unless 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 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.

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## **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]).

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 is available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243, phone (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; phone (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 1993 County of Imperial General Plan Final EIR is SCH #93011023.
  - The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]).

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## SECTION II. ENVIRONMENTAL CHECKLIST

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1. **Project Title:** Glamis Specific Plan
2. **Lead Agency Name and Address:** Imperial County Planning & Development Services Department
3. **Contact Person and Phone Number:** Patricia Valenzuela, Planner IV, 442-265-1749
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** PatriciaValenzuela@co.imperial.ca.us
6. **Project Location:** The proposed Specific Plan Area is located in the unincorporated community of Glamis, a remote area in the eastern portion of Imperial County. The Specific Plan Area is located approximately 27 miles east of the City of Brawley; approximately 32 miles northeast of the City of El Centro; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea (**Figures 1 and 2**). The Specific Plan Area consists of approximately 143 acres located within Section 33, Range 18 East, Township 13 South within the U.S. Geological Survey (USGS) Glamis, California 7.5-minute topographic quadrangle (Assessor Parcel Numbers [APNs] 039-310-017, 039- 310-022, 039-310-023, 039-310-026, 039-310-027, 039-310-029, and 039-310-030).
7. **Project Sponsor's Name and Address:** Polaris Industries Inc.
8. **General Plan Designation:** Glamis Specific Plan Area (GSPA)
9. **Zoning:** The existing zoning designations within the Specific Plan Area are Open Space/Preservation (S-2) and General Commercial (C-2) (**Figure 3**).

### 10. Description of Project:

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

The GSP consists of eight (8) Planning Areas, depicted on **Figure 4**. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3). This designation is intended to accommodate a large variety of commercial uses that are generally supportive of OHV activities and provide for large scale events to be held both on private property as well as adjoining federal lands.

Planning Areas 5 and 6 are designated Commercial-Recreation 1 (CR-1). This designation is intended to allow small scale, low density development of projects. These projects will be designed to deter the use of OHVs on

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public highways or roads. These projects could include employee housing, research and development (R & D) facilities, RV park with restrictions and the like.

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

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

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

The following is a brief description of the proposed land uses within the GSP (**Figure 5**).

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

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

**Storage** - OHV and RV storage is an existing land use within the Specific Plan Area. The GSP will provide for storage for OHVs and RVs to allow visitors to store their vehicles at Glamis year around.

**Entertainment** - The Glamis area has long been known as the premier destination for OHV enthusiasts to enjoy their recreational activities within the world-renowned ISDRA. The GSP will allow for a range of entertainment land uses whose purpose is to enhance the visitors experience to the Glamis Area. Entertainment uses could include an adventure center, amusement facilities, movie theater, obstacle courses, a fireworks and light display area, and racetrack.

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

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



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Renewable Energy - Due to the remote location of the GSP, renewable energy facilities will be developed to provide electricity to the Specific Plan Area. The GSP will allow for the development of a solar and wind energy generation facilities (including battery storage) located throughout the GSP, shown on **Figure 5**.

Infrastructure Improvements - In order to properly accommodate the large volume of visitors to the Specific Plan Area, existing water and wastewater facilities will need to be improved along with the development of additional infrastructure. The GSP will allow for the development of utility buildings, utility substation(s), renewable energy generating facilities and battery storage facilities, as well as water/wastewater treatment facilities and pipelines. Water needs for the Specific Plan and local fire safety requirements would be supplied from an existing well that would be modified as part of the Project. This water is unsuitable for consumption without treatment. Therefore, the Applicant proposes to install a water treatment (e.g. reverse osmosis system) to so that it would be potable for use.

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

## **11. Surrounding Land Uses and Setting:**

The Specific Plan Area is surrounded by open desert land that is managed almost entirely by the BLM. Directly northwest of the Specific Plan Area, is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use, however, camping is allowed. The Specific Plan Area is directly adjacent to the ISDRA to the southwest, south and southeast. The ISDRA is the largest mass of sand dunes in the State of California. North of the NADW is the Chocolate Mountain Aerial Gunnery Range (CMAGR) which is a live-fire training range used for developing and training Marine Corps and Navy aviators. The area to the north east of the Specific Plan Area is BLM land but is not part of the ISDRA. **Figure 11, Surrounding Land Use**, shows the relationship between the Specific Plan Area and surrounding vicinity with the ISDRA located immediately to the southwest, the NADW immediately to the northwest, and the Chocolate Mountains and the CMAGR located to the north.

The Specific Plan Area is located on private land that is directly between the ISDRA and the North Algodones Dunes Wilderness in an unincorporated area of Imperial County. The Specific Plan Area contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store. The Specific Plan Area includes seven project parcels. The Specific Plan Area is regionally accessible via SR-78 (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists. Ted Kipf Road, a County-maintained dirt road, serves as a secondary form of access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The Specific Plan Area is also crossed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the Specific Plan Area and Wash Road which parallels the UPRR south of SR-78.

The Specific Plan Area can be characterized as an area of open desert with several adjoined one- and two-story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store. Additionally, there is a separate seasonal OHV repair business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower is located at the southeast portion of the Specific Plan Area. Due south is a single-family residence,



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large RV storage garage, and other related equipment storage buildings. Additionally, a pre-fabricated residential structure is located on the southeast corner of the Specific Plan Area. To the west, across SR-78 and opposite the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Last, on the northeast side of the Specific Plan Area, crossing the UPRR, there are two triangular parcels that are currently vacant. The topography of the Specific Plan Area can be characterized as relatively flat. The only minor changes in topography are found along the northeast portion of the property (northeast side of the UPRR), which can be attributed to existing elevated flood control earthen dikes and a slight, gradual southwest to northeast trending slope contour. Overall, the elevation of the Specific Plan Area ranges from 325 feet above mean sea level (msl) at the southwest corner to 344 feet above msl at the northeast corner. Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the Specific Plan Area.

Special events, such as Camp RZR, are permitted within the Specific Plan Area through the issuance of discretionary temporary event permits and Conditional Use Permits (CUPs) by the County. Currently, special and temporary events are permitted under CUP #08-0025. Events such as Camp RZR are required to undergo review and approval of event operations and protocols with the County and key stakeholder agencies.

**12. Other Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement):**

To approve a Specific Plan and a Zone Change. Other agency permits and approvals are listed below:

- Approval of the General Plan Amendment: A General Plan Amendment would be necessary to change the entire Specific Plan area from the current General Plan land use designation on the City's General Plan Land Use Map.
- Approval of the Specific Plan: The Glamis Specific Plan has been prepared to realize the objectives of the Project as defined in the Specific Plan. The Specific Plan would be adopted by resolution by the County of Imperial Board of Supervisors, with the Development Standards chapter adopted by ordinance.
- Approval of a Zone Change: A zone change would be necessary to change the zoning within the Specific Plan area from the current "Open Space (S-2) and "C-2" to "Glamis Specific Plan" on the County's zoning map.
- Section 404 Permit: United States Army Corps of Engineers, Clean Water Act (CWA) Section 404 Permit may be required, as necessary. Section 401 Permit: Santa Ana Regional Water Quality Control Board CWA Section 401 Permit may be required, as necessary.
- Streambed Alteration Agreement: California Department of Fish and Wildlife Streambed Alteration Agreement under Section 1602 of the California Fish and Game Act may be required, as necessary.
- Encroachment Permit: Caltrans Encroachment permit.
- Imperial County Air Pollution Control District: Authority to Construct and Permit to Operate.
- State Water Resources Control Board: National Pollutant Discharge Elimination System General Permit.
- Regional Water Quality Control Board (Region 8): Waste Discharge Requirements.

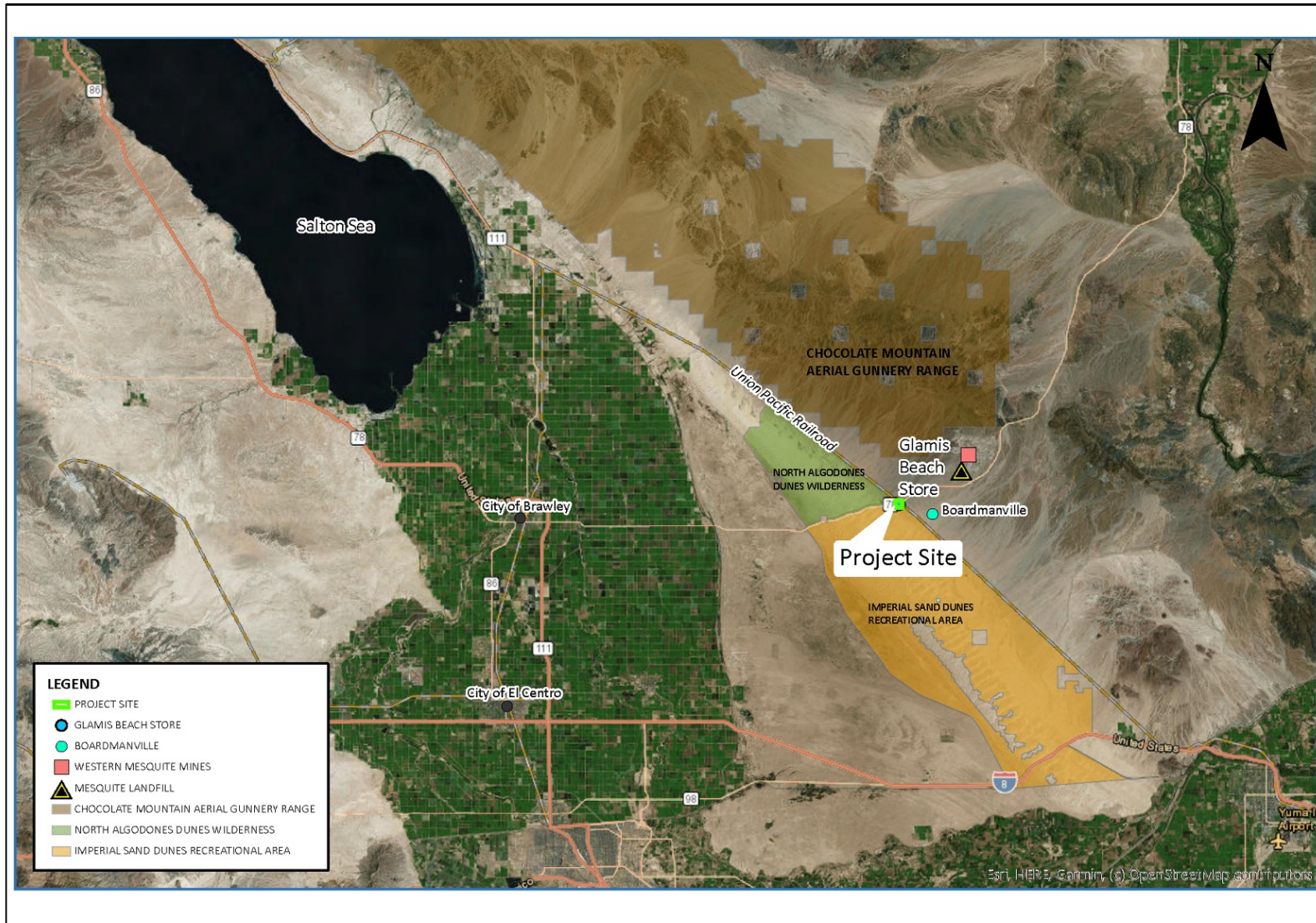
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**13. Native American Consultation: Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1?**

In compliance with Senate Bill 18 (SB 18; Government Code Section 65352.3), the Imperial County Planning & Development Services Department (ICPDSD) sent letters to 14 federally recognized California Native American Tribes and 6 tribal representatives on February 11, 2020, providing notification of the Project and an invitation to participate in consultation. By law, tribes have 90 days from the date of receipt of the notice to request consultation (Government Code 65352.3(a)(2)).

In compliance with Assembly Bill 52 (Chapter 532, Statutes 2014), the ICPDSD sent letters to one (1) California Native American Tribe on February 7, 2020, providing notification of the Project and an invitation to participate in consultation. Under AB-52, California Native American Tribes have 30 days from the date of receipt of the notice to request consultation.

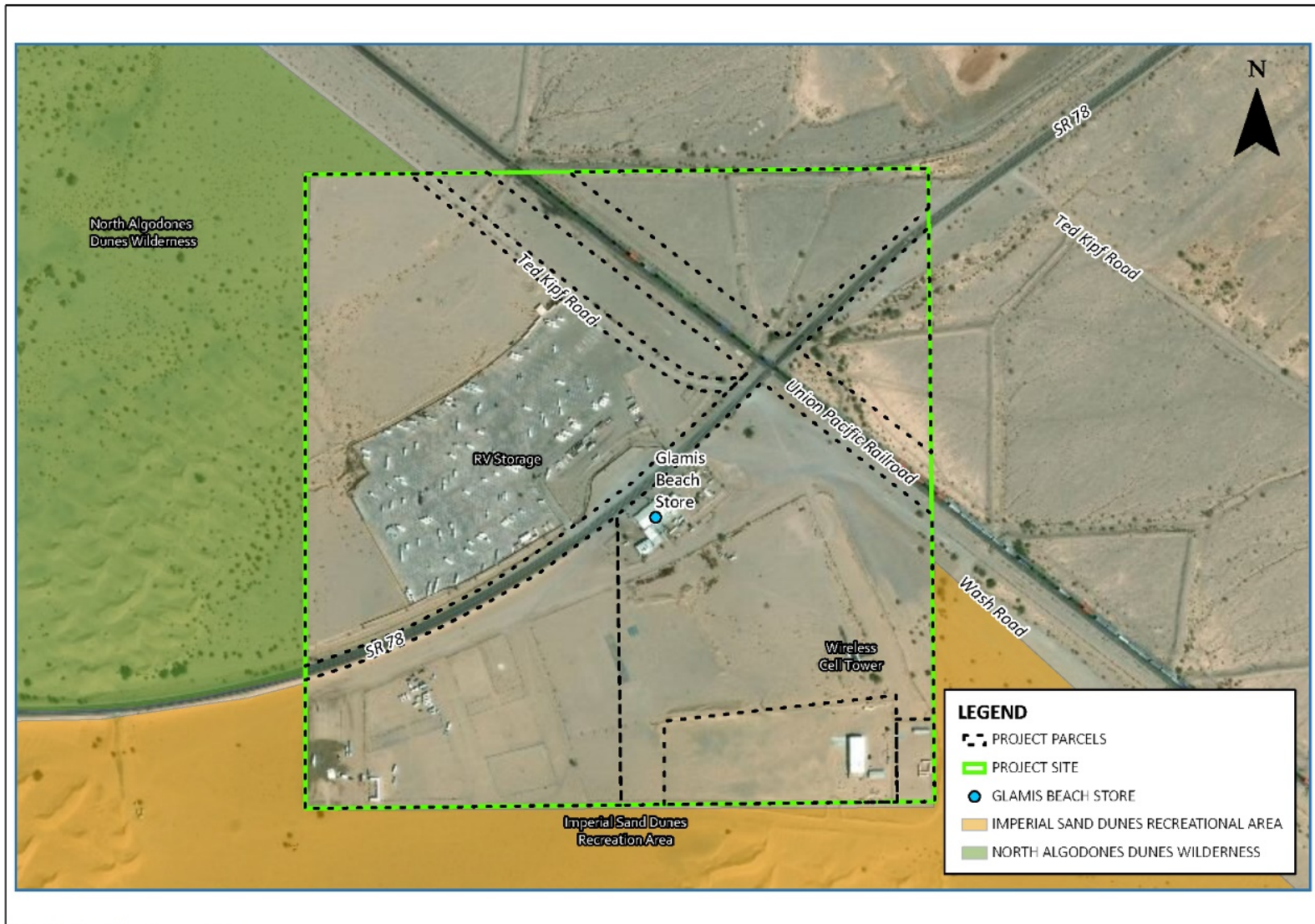
As of the date of this Initial Study, no consultation requests have been received.



SOURCE: The Altum Group, 2020

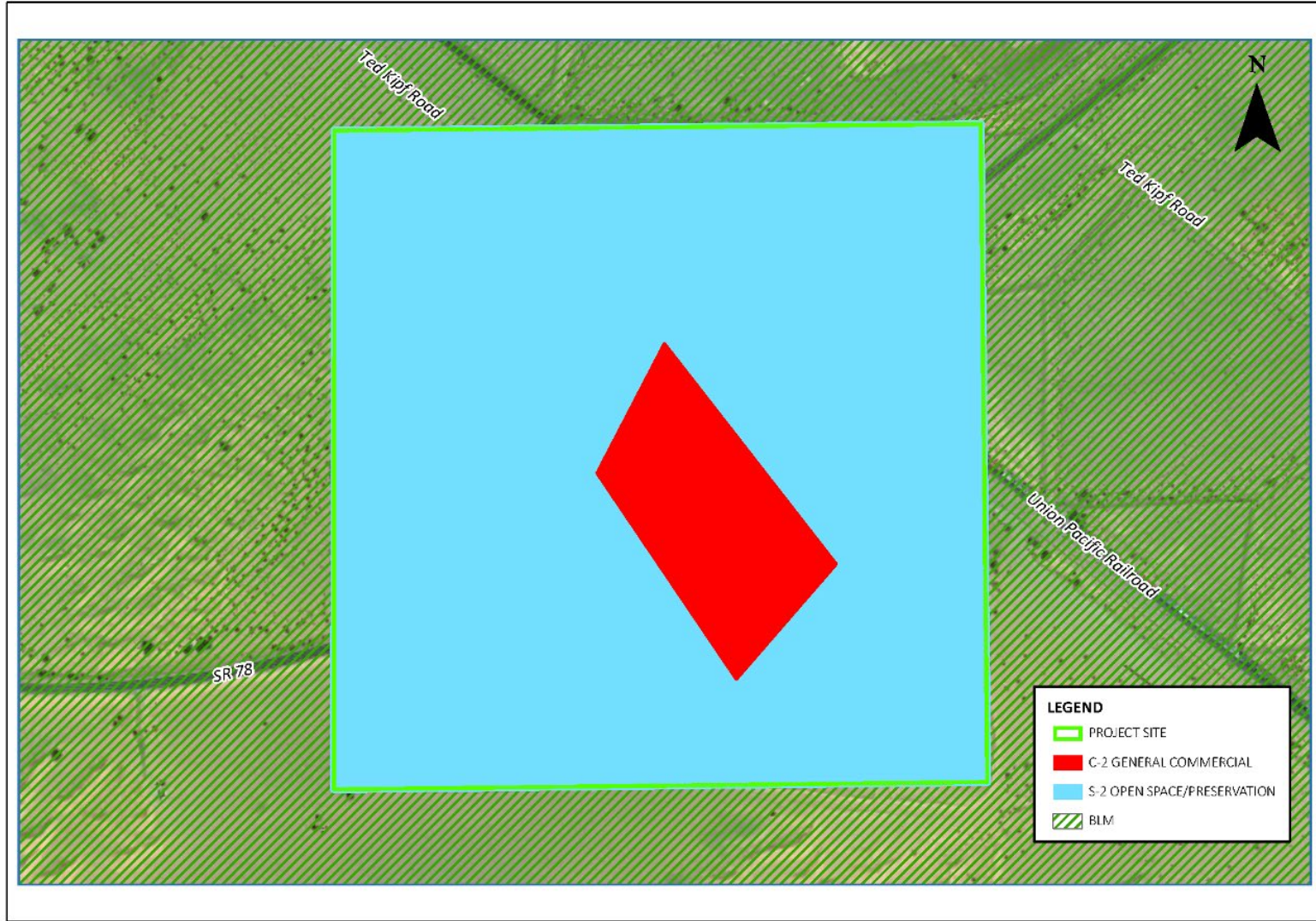
Regional Location  
 Glamis Specific Plan  
 Figure 1





SOURCE: The Altum Group, 2020

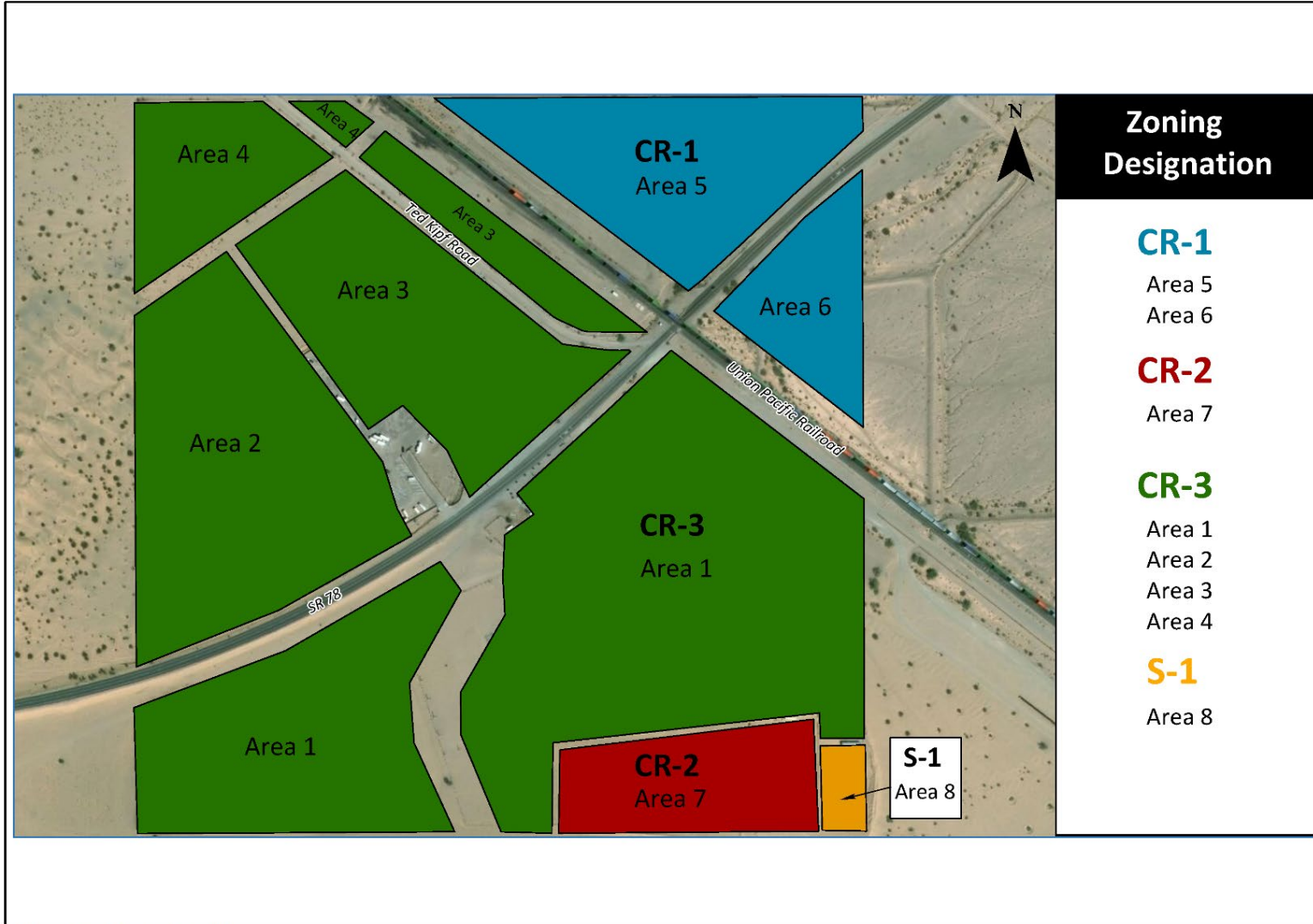
Project Location  
 Glamis Specific Plan  
 Figure 2



SOURCE: The Altum Group, 2020

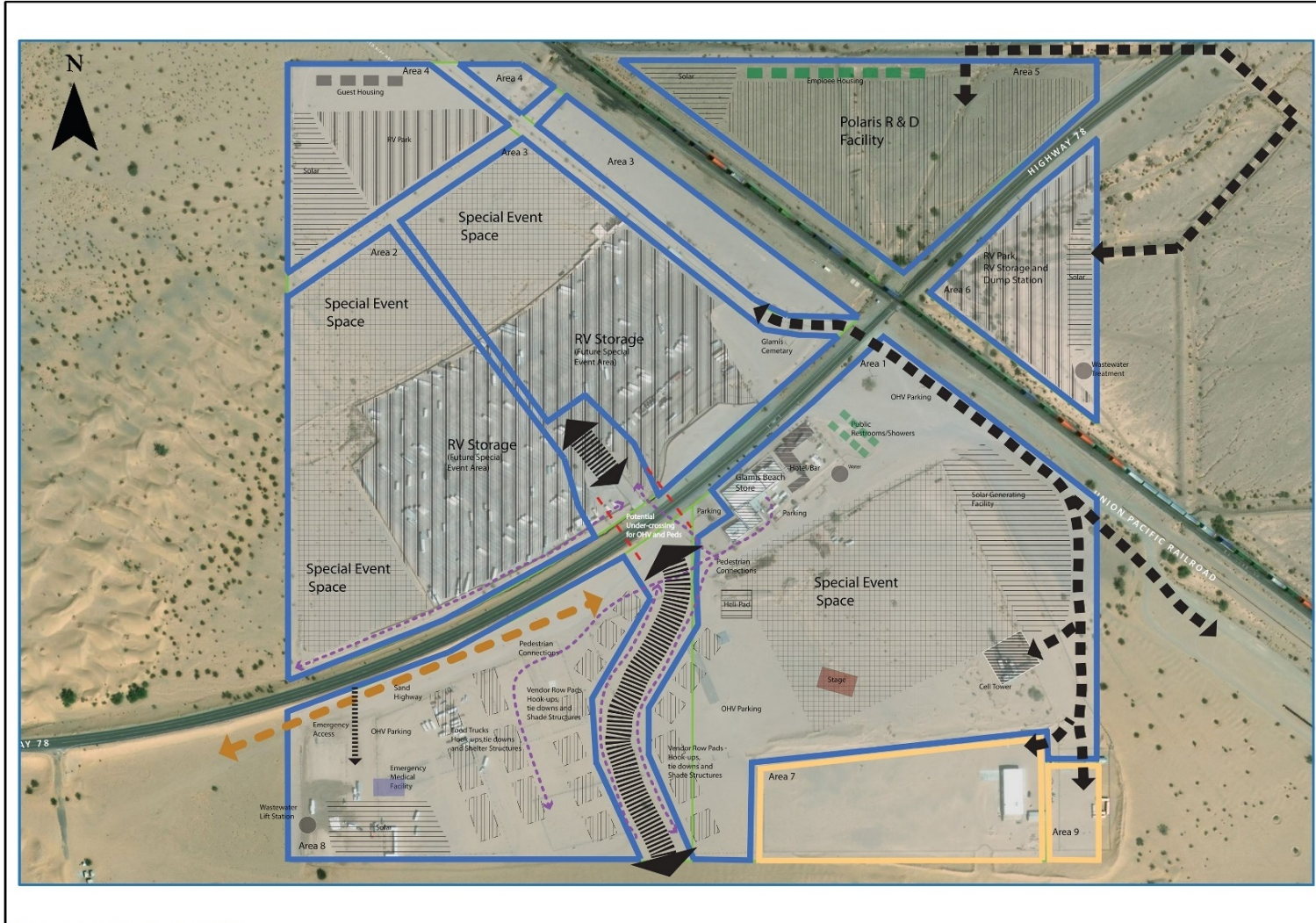
Existing Zoning  
 Glamis Specific Plan  
 Figure 3





SOURCE: The Altum Group, 2020

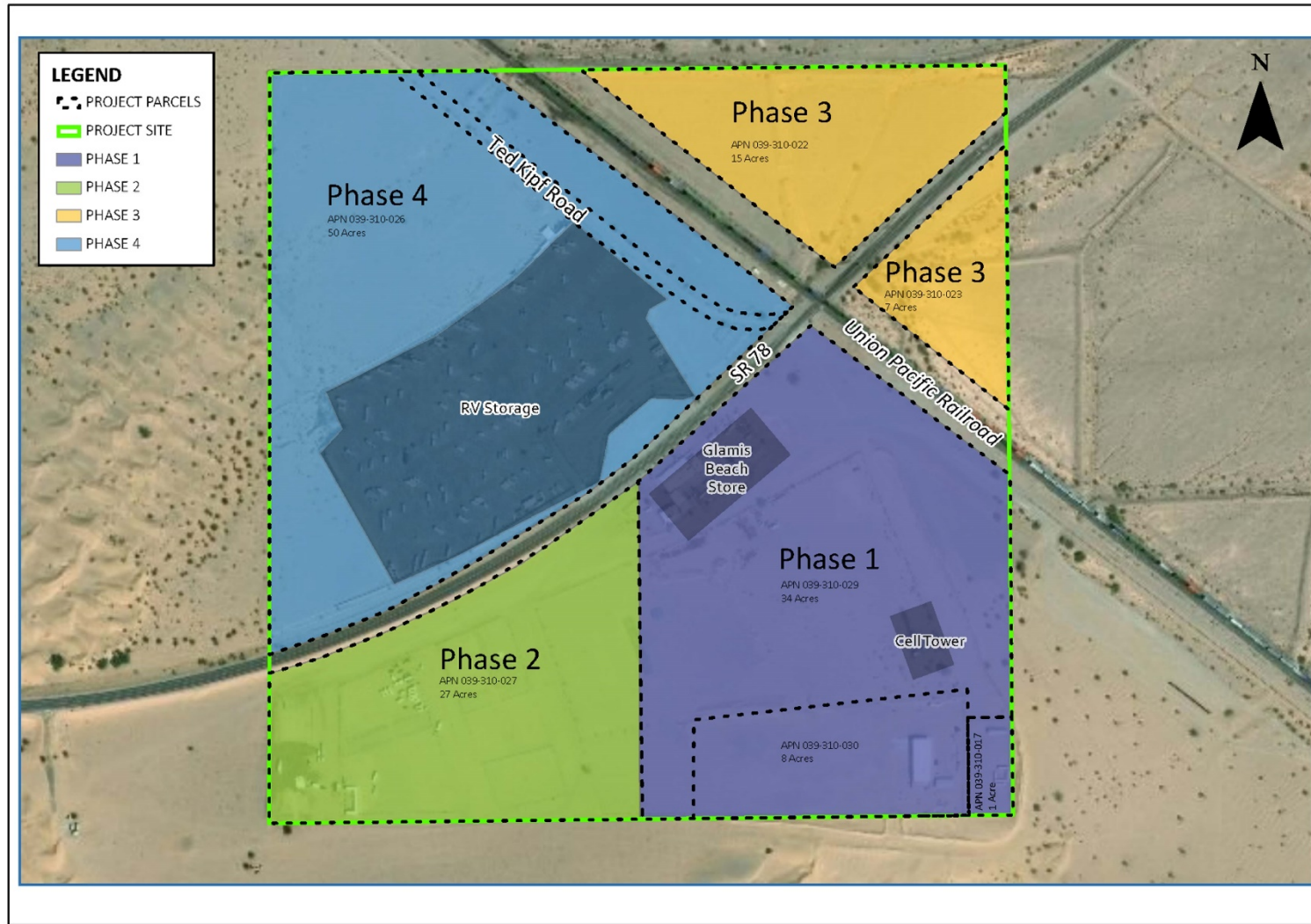
Proposed Planning Areas and Zoning Designations  
 Glamis Specific Plan  
 Figure 4



SOURCE: The Allum Group, 2020

Conceptual Site Plan  
 Glamis Specific Plan  
 Figure 5

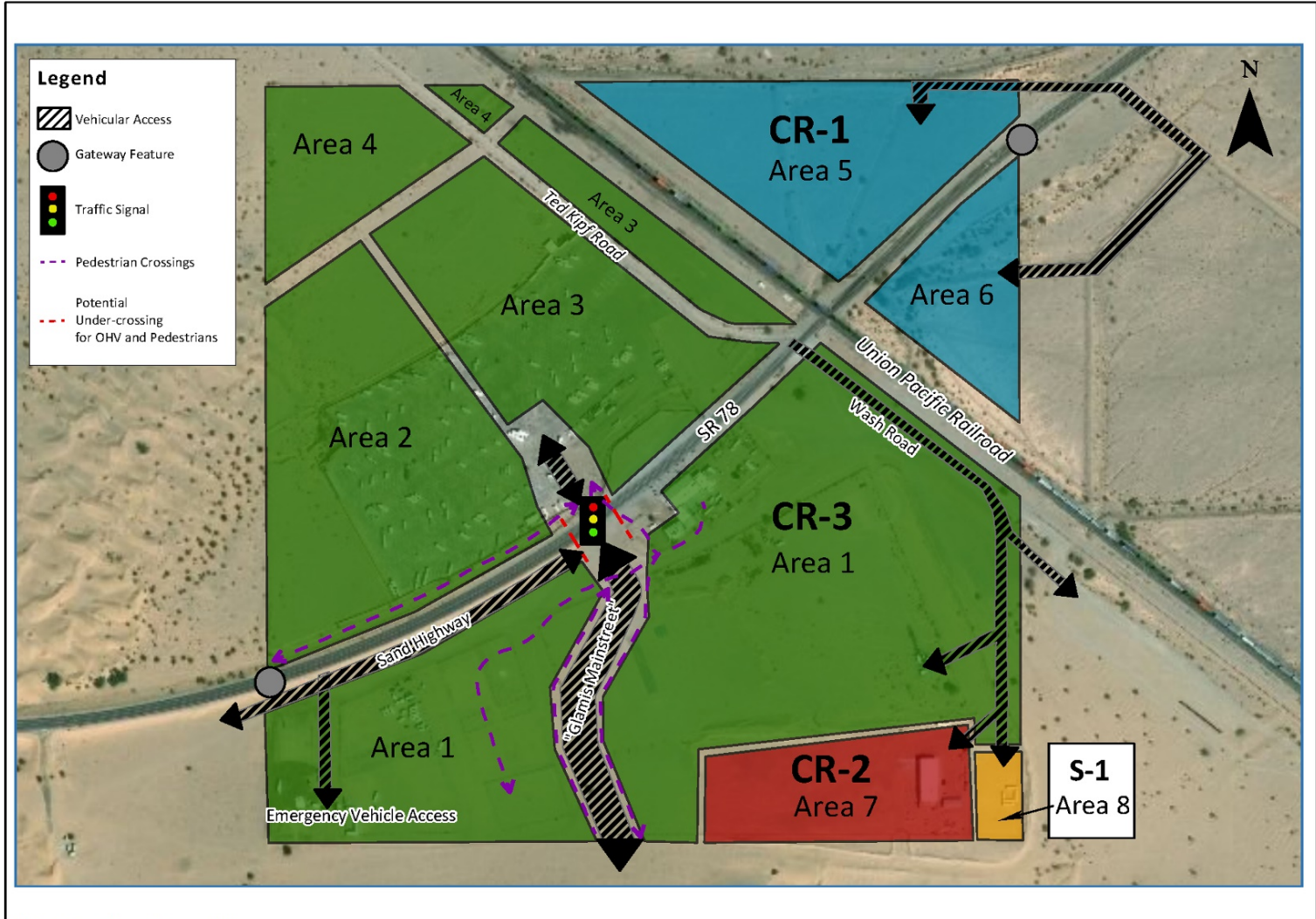




SOURCE: The Altum Group, 2020

Proposed Phasing Plan  
Glamis Specific Plan  
Figure 6





SOURCE: The Altum Group, 2020

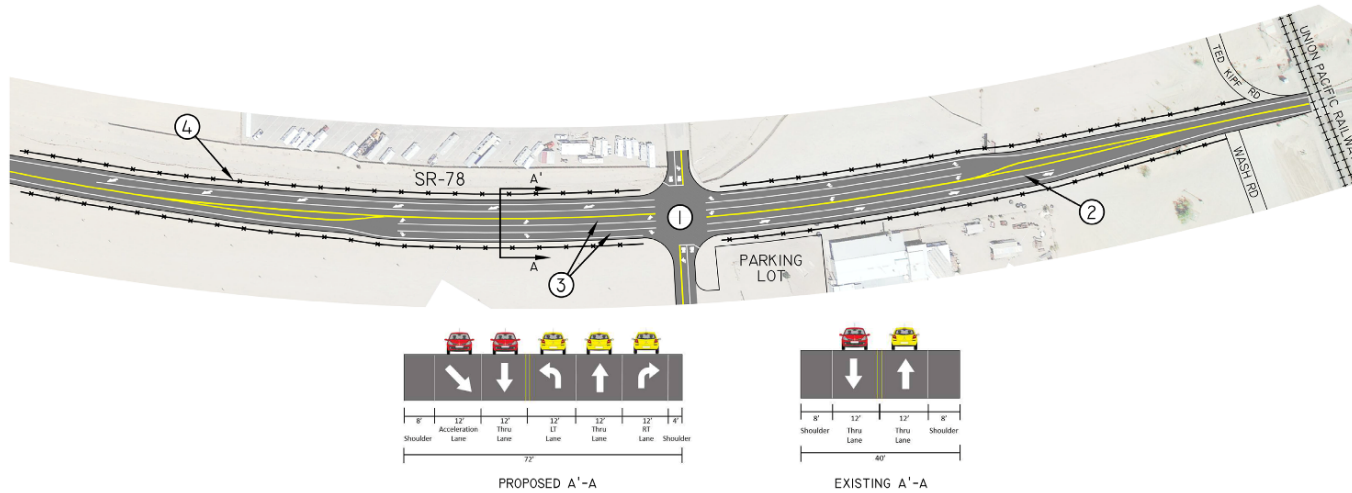
Conceptual Circulation Plan  
 Glamis Specific Plan  
 Figure 7

GENERAL NOTES:

- A TRAFFIC STUDY IS NEEDED TO DETERMINE SEVERAL DESIGN ELEMENTS
- EXTENSIVE COORDINATION WITH CALTRANS AND THE COUNTY IS NEEDED TO DETERMINE THE FINAL DESIGN ELEMENTS
- ANY DEVIATIONS TO DESIGN STANDARDS REQUIRE PROCESSING AND APPROVAL BY CALTRANS HEADQUARTERS
- TRAFFIC MANAGEMENT PLAN IS NEEDED DURING LARGE SPECIAL EVENTS (I.E. CAMP RZR)

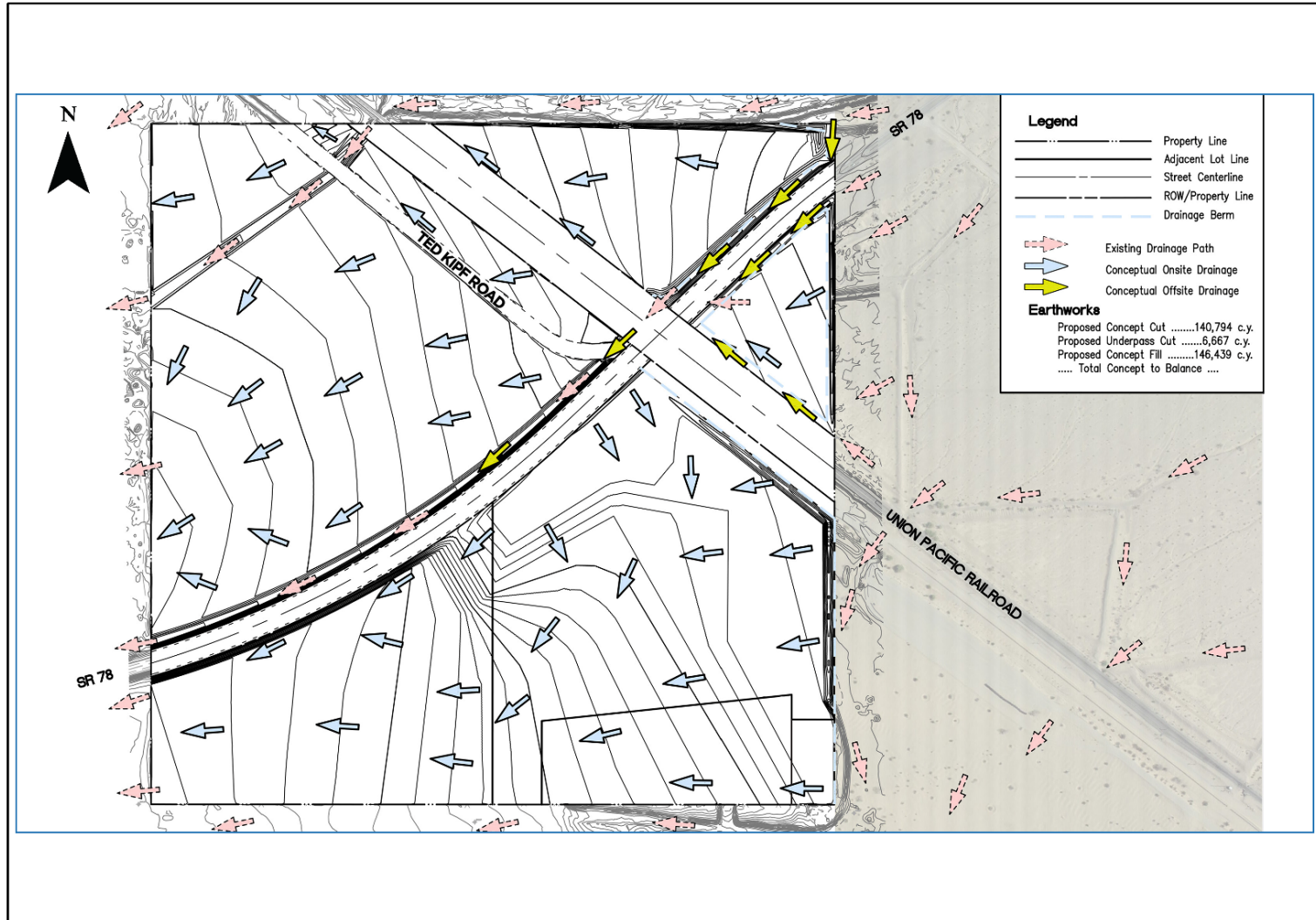
NOTES:

- ① PROVIDE A TRAFFIC SIGNAL IF WARRANTED. IF A TRAFFIC SIGNAL IS WARRANTED, ACCELERATION LANES MAY NOT BE NEEDED.
- ② 600 FEET OF ACCELERATION LANE LENGTH IS DEPICTED. TO PROVIDE THE RECOMMENDED 960 FEET OF ACCELERATION LANE LENGTH, COORDINATION IS NEEDED WITH THE UNION PACIFIC.
- ③ 100 FEET OF LEFT AND RIGHT TURN LANE STORAGE IS ASSUMED. THE ASSUMED STORAGE LENGTH PLUS 485 FEET OF DECELERATION LENGTH IS DEPICTED.
- ④ PHYSICAL BARRIER ALONG PROJECT FRONTAGE.



SOURCE: The Altum Group, 2020

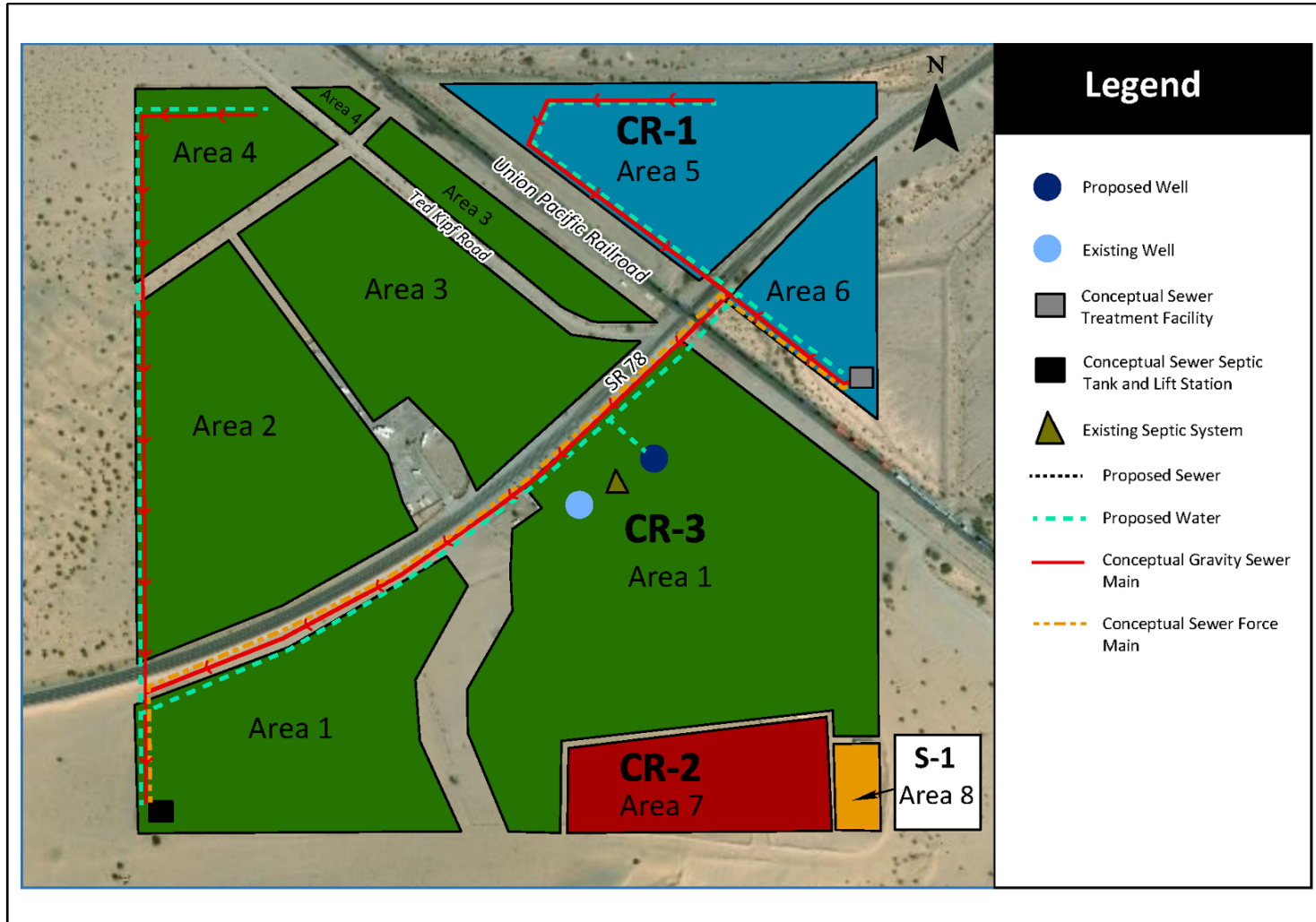
Conceptual Intersection Plan  
 Glamis Specific Plan  
 Figure 8



SOURCE: The Altum Group, 2020

Conceptual Grading and Drainage  
 Glamis Specific Plan  
 Figure 9





SOURCE: The Allum Group, 2020

Conceptual Water and Sewer Plan  
 Glamis Specific Plan  
 Figure 10

## 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.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                             | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources        | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology /Soils              | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials                 |
| <input type="checkbox"/> Hydrology / Water Quality              | <input type="checkbox"/> Land Use / Planning                | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                                  | <input checked="" type="checkbox"/> Population / Housing    | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                             | <input checked="" type="checkbox"/> Transportation/Traffic  | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> 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 Final EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Final EIR, 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

<u>EEC VOTES</u>	<u>YES</u>	<u>NO</u>	<u>ABSENT</u>
PUBLIC WORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH SVCS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OFFICE EMERGENCY SERVICES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
APCD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SHERIFF DEPARTMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ICPDS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Jim Minnick, Director of Planning/EEC Chairman

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Date:

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## PROJECT SUMMARY

### Project Location

The Specific Plan Area is located in the unincorporated community of Glamis, a remote area in the central portion of Imperial County. The project site is located approximately 27 miles east of the City of Brawley; approximately 27 miles east of the City of Brawley; approximately 20 miles north of Interstate 8; and approximately 35 miles southeast of the Salton Sea (**Figures 1 and 2**). The Project site is located in Section 33, Range 18 East, Township 13 South within the U.S. Geological Survey (USGS) Glamis, California 7.5-minute topographic quadrangle (Assessor Parcel Numbers [APNs] 039-310-017, 039-310-022, 039-310-027, 039-310-023, 039-310-029, 039-310-026, and 039-310-030).

### Project Summary

The Specific Plan Area is contained within the County's designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The GSPA allows for the development of a Specific Plan in accordance with the design criteria, objectives and policies that are consistent with the County's General Plan Land Use Element. The proposed Glamis Specific Plan (GSP) would implement the County's objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities (Imperial County General Plan Land Use Element 2015).

### Environmental Setting

The Planning Area is located on private land that is directly adjacent to the ISDRA and the NADW in an unincorporated area of Imperial County. The Planning Area contains the small unincorporated community of Glamis which is centered around the Glamis Beach Store (**Figure 6, Project Site**). The Planning Area includes seven project parcels. The Specific Plan Area is regionally accessible via SR-78 (a.k.a. Ben Hulse Highway), which serves as the primary form of access for motorists and bisects the area in a general east-west direction. Ted Kipf Road, a County-maintained dirt road serves as a secondary form of vehicular access extending northwesterly for approximately 17 miles to Niland-Glamis Road from SR-78. The Planning Area is also traversed by the Union Pacific Railroad (UPRR) which runs north and south through the eastern half of the Specific Plan Area and Wash Road which parallels the UPRR south of SR-78.

### General Plan Consistency

The Project is located within the unincorporated area of Imperial County. The existing General Plan land use designation is "Glamis Specific Plan Area." The existing zoning for the majority of the Planning Area is Open Space/Preservation (S-2) and a very small area is designated General Commercial (C-2). The GSP would consist of eight proposed Planning Areas. Planning Areas 1, 2, 3, and 4 are proposed for designation as Commercial-Recreation 3 (CR-3). Planning Areas 5 and 6 are proposed for designation as Commercial-Recreation 1 (CR-1). Planning Area 7 is proposed for designation as Commercial-Recreation 2 (CR-2). Planning Area 8 would be re-zoned to the County's existing S-1 (Open Space/Recreation) designation.

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## 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)
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**I. AESTHETICS.**

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

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

**a) Less than Significant.** Visual Impact Assessment (VIA) was prepared for the Specific Plan in March 2020 (Altum Group, 2020). The VIA found that no designated scenic vistas as identified by the County are located within visible distance of the Specific Plan Area. Per the List of Officially Designated County Scenic Highways from Caltrans, the Specific Plan Area is not located along a County designated scenic route. The Specific Plan Area is located in a relatively flat area and does not have any rock outcroppings and contains very few trees. The Specific Plan Area, as viewed from multiple vantage points, is already developed with commercial and infrastructure uses. The southwest portion of the Specific Plan Area contains an existing RV Storage facility, directly northwest of the Glamis Beach Store. The SR-78 and the UPRR bisect each other, running northeast and northwest respectively. The Specific Plan Area is bordered by the ISDRA to the south, the NADW to the west, and BLM land to the north and east. Immediate surrounding views from the project site consist of the NADW to the northwest, and the Chocolate Mountains Aerial Gunnery Range to the north and east. The NADW is managed by the Bureau of Land Management (BLM) as Visual Resource Management (VRM) Class I. VRM Class I objectives are to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. None of the activities associated with implementation of the specific plan would occur on the NADW or on BLM lands, thus, the proposed project would not result in a substantial adverse effect on a scenic vista and a less than significant impact would occur. While impacts to scenic vistas are anticipated to be less than significance, this impact will be analyzed in the EIR.

**b) Less than Significant.** According to the California Scenic Highway Mapping System (Caltrans, 2020), within Imperial County a portion of SR -78, between the Anza Borrego State Park Road and SR-86 near Salton City, is eligible for designation as a state scenic highway. However, that portion of SR-78 within the Specific Plan Area



Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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and its immediate vicinity is not designated as a state scenic highway nor is it eligible for designation. The Specific Area is not located along a County designated scenic route. The Specific Plan Area does not contain any rock outcroppings and has very few trees. According to the Class III Cultural Resources Inventory Report prepared for the Specific Plan, the Glamis Beach Store is not considered a historical resource (ASM Affiliates, 2019). As such, implementation of the Specific Plan is not anticipated to substantially damage scenic resources. Impacts would be less than significant and this issue will be discussed in the EIR.

**c) Less than Significant.** The Specific Plan Area is rural in character with a few visual encroachments, including existing commercial and residential structures, a wireless communications tower, and railroad infrastructure. It is located in an area that has been extensively used by OHVs due to the recreational nature of the NADW and ISDRA that surrounds it. The Specific Plan’s Conceptual Open Space and Recreational Plan provides for the inclusion of open space within Planning Areas 1, 2 and 3 to preserve their existing open space character. The Specific Plan also recommends that new structures be sited to provide public views from SR-78, Ted Kipf Road and other publicly accessible vantage points. Implementation of the Specific Plan is not anticipated to substantially degrade the existing visual character or quality of public views of the Specific Plan Area or its surroundings. Using BLM Visual Resources Inventory (VRI) classes system, the EIR will evaluate changes to visual character or quality of public views from implementation of the Specific Plan.

**d) Less than Significant.** Implementation of the Specific Plan is not expected to create a substantial new source of nighttime lighting or day-time glare and would provide external safety lighting for both normal and emergency conditions at the primary access points. Lighting will be designed to provide the minimum illumination needed to achieve safety and security in the and will be downward facing and shielded in order to focus the illumination in the immediate area. Additionally, Specific Plan implementation activities would be required to comply with Imperial County Ordinance 90301 which regulates glare, outdoor lighting, and night sky protection. All lighting associated with implementation of the Specific Plan will be subject to County approval and compliance with Imperial County Requirements (Altum Group 2020). Therefore, implementation of the Specific Plan is anticipated to result in less than significant lighting impacts and this issue will be addressed in the EIR.

The Specific Plan includes the development of solar arrays and solar generating facilities as a permitted use to provide onsite power to the Glamis area. Although there would be some level of potential reflectivity from the operation of solar panels, upon final design, solar panels would be selected that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands. Solar arrays would be designed to not orient the panels towards any known air travel routes for private, commercial, or military airplanes. A full glint/glare analysis will be completed and potential impacts will be analyzed in the EIR.

## II. AGRICULTURAL 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

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

**a) No Impact.** According to the 2016 Farmland Mapping and Monitoring Program Map for Imperial County, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance(California Department of Conservations 2016a)). No impacts related to the conversion of FMMP farmlands to non-agricultural use would occur. This environmental parameter is not proposed for further analysis in the EIR.

**b) No Impact.** The existing General Plan land use designation is " Glamis Specific Plan Area" and the existing zoning is Open Space/Preservation (S-2) and Medium Commercial (C-2). Agricultural uses are not allowed in the C-2 zone. While the storage of agricultural products and other agricultural activities are an allowable use within the S-2 Zone, there are no agricultural activities ongoing with the Specific Plan Area. Additionally, the Specific Plan Area is not covered under a Williamson Act contract (California Dept. of Conservation, 2016b). For these reasons, the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

**c) No Impact.** Neither the Specific Plan Area nor surrounding areas are used for timber production or are defined as forest lands. The proposed project would not conflict with any zoning designations designed to preserve timber

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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or agricultural resources. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

**d) No Impact.** There are no existing forest lands either on-site or in the immediate vicinity of the Project Area. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur under this threshold. This environmental parameter is not proposed for further analysis in the EIR.

**e) No Impact.** The proposed project does not include changes in the existing environment which, due to their location or nature, would result in the conversion of neighboring farmland to non-agricultural use. The Specific Plan Area is surrounded by open desert and the nearest agricultural lands occur approximately one mile to the north, across State Route 86/Highway 86. The proposed project would not result in the conversion of farmlands off-site to non-agricultural uses. No impacts are identified for this issue area. This environmental parameter is not proposed for further analysis in the EIR.

### 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 make the following determinations. Would the project:

- |   |                                     |                          |                          |                          |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

#### Discussion:

**a) Potentially Significant Impact.** The Specific Plan Area is located within the jurisdiction of the Imperial County Air Pollution Control District, in the Salton Sea Air Basin (SSAB). The SSAB is classified by the State as a nonattainment area for ozone (O3) as well as a nonattainment area for the State standards pertaining to particulate matter less than 10 microns (PM10). In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard.

Project construction activities would generate ozone precursor (i.e., oxides of nitrogen [NOX] and reactive organic gases [ROG]) emissions as well as CO, PM2.5, and PM10 emissions that could result in significant impacts on regional air quality. Emissions sources would include heavy equipment used for excavation and grading, cranes, tractors, loaders, backhoes, pavers and on-road motor vehicles for equipment and material deliveries as well as construction workers' vehicles. Specific Plan implementation activities (Camp RZR, etc.) are other emissions

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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sources. Grading and activities on unpaved roads would contribute to fugitive PM10 and PM2.5 emissions. These impacts could be potentially significant. Further analysis of air quality impacts is warranted to determine whether the project would conflict with or obstruct implementation of the applicable plans for attainment and, if so, the reasonable and feasible mitigation measures that could be adopted to reduce such impacts. These issues will be evaluated in the EIR.

**b) Potentially Significant.** SSAB is classified by the State as a nonattainment area for ozone (O3) as well as a nonattainment area for the State standards pertaining to particulate matter less than 10 microns (PM10). In addition, the SSAB is classified as a serious nonattainment area for the PM10 standard.

ICAPCD rules and regulations would apply to all cumulative project activities within the SSAB. Construction emissions will be analyzed in the EIR as well as short- and long-term emissions from implementation of the Specific Plan. Cumulative contributions of emissions to the SSAB would be considered potentially significant and will be evaluated further in the EIR.

**c and d) Potentially Significant.** At present, the Specific Plan Area does not contain a substantial number of persons or sensitive receptors. Construction and operational activities would result in fugitive dust and diesel exhaust and emissions that could adversely affect air quality and/or be a source of odors. Mitigation measures recommended by the ICAPCD for diesel equipment and dust control will be evaluated as part of the EIR to avoid or reduce impacts; however, these impacts are considered potentially significant and will be evaluated in the EIR.

#### 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

**a) Potentially Significant Unless Mitigation Incorporated.** The Project has the potential to adversely affect candidate, sensitive, or special status species including flat-tailed horned lizard (FTHL) (Barrett Biological 2019). FTHL could potentially occur within the softer sands (within and around the washes, and along the roadsides) in the creosote bush scrub on-site. There is an abundance of prey (ants) that could support FTHL presence. There is potential that there would be direct and/or indirect impacts to this species if construction occurs during the active period of mid-February to mid-November. Ground disturbance from heavy equipment, which may potentially impact the FTHL, would be considered significant and would require mitigation.

**b) No Impact.** There is no riparian habitat found on site, therefore this project will not have a substantial adverse effect on any riparian habitat.

**c) No Impact.** A stormwater channel runs through a small portion of the northeast which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes were observed on site. It is recommended that the ACOE and CDFW be consulted to determine permitting requirements (Barrett Biological 2019). There are no wetlands found on site; therefore this project will have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

**d) Less Than Significant Impact.** This project is in a predominately developed and fenced community. The Site is bisected on by SR-78, Ted Kipf Road and Union Pacific railroad and as a result of these existing barriers, the projects will not interfere substantially with the currently restricted movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Thus, the impact would be less than significant.

**e) Potentially Significant Unless Mitigation Incorporated.** The Imperial County General Plan Open Space and Conservation Element (County of Imperial 2016) contains an Open Space Conservation Policy that requires detailed investigations to be conducted to determine the significance, location, extent, and condition of natural

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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resources in the County, and to notify any agency responsible for protecting plant and wildlife before approving a project which would impact a rare, sensitive, or unique plant or wildlife habitat. As noted above, implementation of the Specific Plan has the potential to result in significant impacts to candidate, sensitive, or special status species, and washes and ephemeral streams. Such impacts could conflict with Open Space and Conservation Element and are considered potentially significant.

**f) No Impact.** The Specific Plan is not located within an area that is subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

**V. CULTURAL RESOURCES.**

Would the project:

- |  |                                     |                          |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

**a, b, and c) Potentially Significant Impact.** A Phase III Cultural Resources Inventory Report was prepared for the Specific Plan by ASM Affiliates in July 2019(ASM Affiliates, 2019). A total of approximately 141 acres was subject to 100 percent intensive Class III pedestrian survey. Prior to the survey, a cultural resources records search was completed at the South Coastal Information Center (SCIC) of the project area of potential effect (APE). Seven cultural resources were identified within the APE. Three of these were discovered during survey while the remaining four were previously recorded. A single isolated prehistoric artifact was identified within a disturbed context, while historic cultural resources include refuse deposits, roads, a railroad, and a cemetery.

Project-related ground disturbing activities could cause a substantial adverse change in a historical or archaeological resource. Although unlikely, there is a potential for unknown human remains to be unearthed during earthwork activities. Therefore, a potentially significant impact is identified for these resources. The findings of the cultural resources report will be included in the EIR analysis.

**VI. ENERGY.**

Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

**a) Less Than Significant.** The existing use requires diesel generators to supply power. These generators would be phased out once the project has been connected to a constant electricity source. Upgrades to the electrical system could include construction and installation of a power line (transmission line and/or distribution line) by Imperial Irrigation District (IID) to extend power from the nearest substation (approximately 7.2 miles to the northeast). A second and potentially more viable option would be to develop a small commercial solar photovoltaic (PV) system, with a backup battery storage component or another green power system. A third option may be wind generation. No wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would occur. This is considered a less than significant impact and will be further evaluated in the EIR.

**b) No Impact.** Implementation of the Specific Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impacts would occur under this criteria.

**VII. GEOLOGY AND SOILS.**

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994),	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
creating substantial direct or indirect risks to life or property?				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

**a.1) Less Than Significant Impact.** The Specific Plan is located in southern California, an area known to be geologically active and which is subject to seismic events. The project site does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone. Well-delineated fault lines cross through this region as shown on California Geological Survey [CGS] maps; however, no active faults are mapped in the immediate vicinity of the site. Therefore, active fault rupture is unlikely to occur at the project site. While fault rupture would most likely occur along previously established fault traces, future fault rupture could occur at other locations. Aerial photographs from 1961 to 2016 were reviewed and no naturally occurring lineaments were observed within or adjacent to the site. Anthropogenic linear features associated with drainage control are common in the site vicinity (Earth Systems Pacific 2019). Thus, there would be a less than significant impact from rupture of a known earthquake fault.

**a.2) Less Than Significant Impact** Approximately 15 active faults or seismic zones lie within 70 miles of the Specific Plan area. The primary seismic hazard to the site is strong ground shaking from earthquakes along regional faults including the Brawley and Imperial faults. The Brawley segment of the San Andreas fault is located approximately 24 miles west of the site. The Imperial segment of the San Andreas fault is located approximately 27 miles west of the site. The site is located within a very active seismic area in southern California where large numbers of earthquakes are recorded each year. Approximately 31 magnitude 5.5 or greater earthquakes have occurred within 60 miles of the site since 1852. Significant local Imperial Valley earthquakes have included the 1940 Imperial Valley (6.9), 1942 Fish Creek Mountains (6.6), 1968 Borrego Mountain (6.6), 1979 Imperial (6.4), 1987 Elmore Ranch and Superstition Hills (6.6), and 2010 Baja (7.2) earthquakes (Earth Systems Pacific 2019).

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

While accurate earthquake predictions are not possible, various agencies have conducted statistical risk analyses. In 2013, the CGS and the United States Geological Survey [USGS] presented new earthquake forecasts for California (USGS UCERF3). The recent Working Group of California Earthquake Probabilities estimated a 35 to 41 percent conditional probability that a magnitude 6.7 to 7.0 or greater earthquake may occur in 30 years (2014 as base year) along the nearby Coachella segment of the San Andreas fault, 37 to 45 percent for the Brawley



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seismic zone, 30 to 41 percent for the Imperial fault, and about 5 to 7 percent for the San Jacinto (Superstition Hills section) fault. The revised estimate for an 8+ magnitude earthquake along the local San Andreas fault is about 7%. The primary seismic risk at the site is a potential earthquake along the Brawley seismic zone and San Andreas, San Jacinto, and Imperial faults that are northwest and west of Glamis. Geologists believe that the San Andreas fault has characteristic earthquakes that result from rupture of each fault segment. The estimated characteristic earthquake is magnitude 8.1 for a multi-segment San Andreas rupture event. The San Jacinto fault is historically be one of the most active faults in southern California, especially in the southern Imperial Valley and San Jacinto Valley. Multi-segment magnitudes for a San Jacinto fault rupture is approximately 7.9. A geotechnical report was prepared for the Project (Earth Systems Pacific 2019) and will be discussed in the EIR.

**a.3 and a.4) Less Than Significant.** Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. Liquefaction describes a phenomenon in which saturated soil loses shear strength and deforms as a result of increased pore water pressure induced by strong ground shaking during an earthquake. Dissipation of the excess pore pressures will produce volume changes within the liquefied soil layer, which can cause settlement. Shear strength reduction combined with inertial forces from the ground motion may also result in lateral migration (lateral spreading). Factors known to influence liquefaction include soil type, structure, grain size, relative density, confining pressure, depth to groundwater (typically occurs in the upper 50 feet), and the intensity and duration of ground shaking. Soils most susceptible to liquefaction are saturated, loose sandy soils and low plasticity clay and silt. Groundwater depth at the project site is more than 50 feet below the ground surface and therefore liquefaction potential is low. (Earth Systems Pacific 2019). Due to the flat topography of the site the potential for a landslide is very low. Thus, the impact would be less than significant.

Non-seismic hazards within the Specific Plan area will be addressed in the EIR.

**b) Potentially Significant Impact.** The proposed Project would result in changes to the current topography because of grading and site preparation activities. Although these changes will be designed to meet stringent regulatory requirements, there is a potential for soil erosion, loss of topsoil, and geologic instability. The EIR will evaluate these potentially significant adverse impacts.

**c) Less Than Significant Impact.** As discussed in c. 3 and 4, the proposed project risk for on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse are expected to be less than significant. These issues will be addressed in the EIR.

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

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should be observed or tested during grading to confirm or modify these findings (Earth Systems Pacific 2019). The EIR will evaluate the potential impacts related to expansive soils.

**e) No Impact.** Soils in the Specific Plan Area currently support the existing septic system and leach field that provide the small amount of wastewater needed for Glamis Beach Store employees. This same infrastructure would be used for the proposed Project. No impacts are expected.

**f) Less Than Significant Impact.**

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

**VIII. GREENHOUSE GAS EMISSIONS.**

Would the project:

- |  |                                     |                          |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

**a) Potentially Significant.** Greenhouse gases (GHGs) emitted by human activity are implicated in global climate change or global warming. The principal GHGs are Carbon Dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>), Nitrous Oxide (N<sub>2</sub>O), and Fluorinated Gases. The transportation sector (e.g., on-road motor vehicles, off-highway vehicles, aircraft) is the single largest source of GHG emissions and accounts for one-half of GHG emissions globally. Short-term greenhouse gas emissions from construction could come from construction equipment, construction support vehicles, material truck trips, and worker vehicle trips. Long-term emissions would come from combustion of natural gas and diesel fuel (producing greenhouse gas emissions of CO<sub>2</sub> and CH<sub>4</sub>), as well as from fugitive emissions (a component of fugitive emissions is methane). Indirect emissions associated with electrical generation and with worker and truck transportation offsite could also result. An air quality and greenhouse gas emission analysis will be prepared for the Project and potentially significant impacts related to GHG emissions will be addressed in the EIR.

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**b) Potentially Significant.** The Specific Plan would be considered to have a significant impact if it would be in conflict with State plans, policies or regulations adopted for the purpose of reducing GHG emissions. GHG emissions and the Specific Plan’s consistency with applicable GHG plans, policies, and regulations will be evaluated in the EIR.

**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?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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 Specific Plan Area? | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Discussion:**

**a) Less Than Significant.** The Specific Plan Area is characterized as an area of open desert consisting of several adjoined one and two story metal building structures representing the Glamis Beach Store, and metal corrugated water tanks situated directly behind the store. Additionally, there is a separate seasonal OHV repair

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business connected to the Glamis Beach Store. A wood fence for delineated parking/vendor areas is located directly west of the store. A communications facility tower is located at the southeast portion of the property. Due south is a single family residence, large recreational vehicle storage garage, and other related equipment storage buildings. Additionally, a dilapidated pre-fabricated residential structure is located on the southeast corner of the project site. To the west, on the opposite side of the Glamis Beach Store, there is an existing RV storage area as well as vacant desert land. There is also an existing 20-acre paved RV storage area for Glamis Dunes Storage and Luv 2 Camp RV Trailer Rentals, and the existing historical cemetery located at the southwest corner of SR-78 and Ted Kipf Road. Lastly, on the northeast side of the GSP, crossing the Union Pacific Railroad, there are two triangular parcels that are currently vacant. The proposed project would not require the limited transport, storage, and use of fuels, polymer-based sealants, and other fluids for the fueling/servicing of construction equipment. These practices are already in place for current operations and the Project would not substantially increase the transport or use of hazardous materials above current levels.

Transportation, storage, and disposal/recycling of such products are extensively regulated at the local, state and federal levels. Current and future construction and operations are, and will be, required to be in compliance with these regulations. The current inventory of chemicals on site are not expected to increase markedly as a result of the proposed project. Because operations would be similar to current operations, impacts would be less than significant and will be evaluated in the EIR.

**b) No Impact.** Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site and is not listed on the Cortese Knox list. According to the State Water Resources Control Board, there are no Underground Storage Tanks in the vicinity of the landfill. This environmental parameter is not proposed for further analysis in the EIR.

**c) No Impact.** Implementation of the Specific Plan would not emit hazardous emissions, handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school (Magnolia Union Elementary School) is located 21 miles west of the Project site. No impacts would occur, and this environmental parameter is not proposed for further analysis in the EIR.

**d) No Impact.** Based on a search of the Government Code Section 65962.5 “Cortese” list, the Glamis Beach Store is not listed as a hazardous materials site. No impacts would occur, and this environmental parameter is not proposed for further analysis in the EIR.

**e) No Impact.** The Project is not located within the Airport Land Use Compatibility Plan for Imperial County Airports (County of Imperial, 1996) or within two miles of a public airport or public use airport. The nearest public use airport, Holtville Airport, is located 14 miles southwest the project vicinity. For these reasons, the proposed project would not result in a safety hazard or expose people residing or working in the area to excessive noise levels. No impacts have been identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

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**f) Potentially Significant Impact Unless Mitigation Incorporated.** Implementation of the Specific Plan would generate construction trips and the potential for temporary roadway lane closures during construction of proposed traffic improvements, which could temporarily affect an emergency response or evacuation plan. This impact is considered potentially significant and will be addressed in the EIR.

**g) Less than Significant.** The Project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial, n.d.). This is considered a less than significant impact and will be addressed in the EIR

**X. HYDROLOGY AND WATER QUALITY.**

Would the project:

- |   |                          |                                     |                                     |                          |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?                                 | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would: |                          |                                     |                                     |                          |
| 1) Result in substantial erosion or siltation on- or off-site;  | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;  | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or                            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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**Discussion:**

**a) Potentially Significant.** A stormwater channel runs through a small portion of the northeast section of the Specific Plan which is channeled under the railroad track. On the southeast portion, a wash is piped under SR-78. Several established washes and ephemeral washes also occur within the Specific Plan Area (Barrett Biological 2019). Potential discharges could be wastewater generated by the Glamis Beach Store, restaurant and bar which is currently being discharged into an existing septic tank located near to those buildings and potential discharges related to the water and wastewater treatment systems.

Future wastewater treatment needed (i.e., secondary and tertiary treatment) will be determined by the amount of wastewater forecasted to be generated by each phase of structural improvement. Free groundwater was not encountered in borings or test pits during explorations conducted in January of 2019. Boring depths exceeded 50 feet from the ground surface. Moisture contents observations of the soils indicate the soils are dry to moist. By definition, perched ground water conditions were not observed during exploration. Observations did not indicate “wet” soils meaning free water was noted on the soil. Impermeable type soils (generally clay) were not found at depths ranging from the ground surface to 50 feet bgs. Moisture contents performed in the lab indicated values between 1 percent and 9 percent, which indicates degrees of saturation less than approximately 50 percent (Earth Systems Pacific 2019). Thus, the introduction of these materials into groundwater resources through percolation or inundation would result in less than significant water quality impacts. Impacts to water quality could also occur through sedimentation of local runoff associated with erosion, and the discharge of substances indirectly related to Project construction or operation (e.g., diesel or automobile fuels).

The potential to create substantial erosion and siltation or violate any water quality standards or waste discharge requirements is considered significant and will be discussed in the EIR.

**b) Less than Significant.** Non-potable water for the existing RV Park and Glamis Beach Store is provided via an existing on-site water well, which would be modified as part of the Specific Plan’ implementation. A water supply assessment for the Project is being prepared and would evaluate potential impacts to water resources. Potential impacts to groundwater resources are expected to be less than significant and will be addressed in the EIR.

**c.1), c.2) and c.3) Less Than Significant Impact.** A stormwater channel runs through a small portion of the northeast which is channeled under the railroad track. On the southeast portion, a wash is piped under SR 78. Several established washes and ephemeral washes were observed on site (Barrett Biological 2019). According to the Conceptual Drainage and Grading Plan Element of the Specific Plan, the existing topography and drainage of the project site generally drains from the northeast to the southwest via existing earthen channels and berms. The northeast portion of the project site (Planning Areas 5 & 6) are openly affected by offsite flows and are directed towards three existing concrete culverts that pass under the UPRR. The drainage flows from these three concrete culverts underneath the UPRR, flow through and/or around portions of the existing project site (Planning Areas 1, 2, 3, 4, 7 and 8) towards the southwest, which are located north and south of SR-78. All planning areas southwest of the UPRR, where future land uses are proposed, are protected by earthen channels and berms. The remaining open areas, throughout the entire site, have areas that are protected by existing earthen channels and berms.

Grading for the proposed project would provide flood protection for future land uses within the entire project site and release the drainage to the southwest in an overall equivalent historical pattern of natural drainage courses



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consistent with California drainage law. The on-site design northeast of the UPRR will provide flood protection (Planning Areas 5 and 6) by continuing the off-site flows with modifications to each of the earthen drainage berms and channels. These modifications will re-direct the drainage around each of the planning areas to the southwest towards the three existing concrete culverts that pass under the UPRR. The modified existing earthen berm north of Planning Area 5 will continue to redirect flows north and west as will a new earthen berm to the southeast for planning area 6, to the south and west. The remainder of the drainage will be directed into the modified existing earthen channels along each side of SR 78. Each of these earthen channels and berms will be constructed on-site and will re-direct the existing flows in a manner consistent with the surrounding drainage patterns and practices. The manner and release of the drainage flows will be equivalent to the existing capture, conveyance and release to the Southwest under the UPRR, via existing concrete culverts. Drainage impacts are anticipated to be less than significant and will be addressed in the EIR.

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

The Specific Plan lies within two designated FEMA Flood Zones: A and X Zone “A” is defined as “Without Base Flood Elevation” and Zone “X” is defined as “Areas of 0.2% annual chance floodplain; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas of less than 1 square mile; and areas protected by levees from 1% annual chance flood.” These zones are defined on FEMA Map Number 06025C1125C and 06025C1475C both effective 9/26/2008. The project site is in an area where sheet and concentrated flow and erosion could occur. Appropriate project design by the civil engineer, construction, and maintenance can minimize the sheet flooding potential (Earth Systems Pacific 2019).

The site is far inland, so the hazard from tsunamis is non-existent.

Potential impacts from floods and seiches would be less than significant.

**e) Less than Significant.** The Project site located within the Ocotillo-Clark Valley Groundwater Basin (Basin Number 7-25), as defined by the California Department of Water Resources. The Ocotillo-Clark Valley Groundwater Basin does not fall within the basin classification that requires implementation of a sustainable groundwater management plan (also known as a groundwater sustainability plan, or GSP, under the Sustainable Groundwater Management Act definitions). However, in April 2017 the County amended a comprehensive Groundwater Management Ordinance to preserve, protect and manage groundwater resources. The Groundwater Ordinance, codified as Division 22 of Title 9 of the Imperial County Code, aims to avoid or minimize impacts on existing and proposed groundwater extraction activities and groundwater resources. The Groundwater Ordinance requires that existing extraction facilities be permitted and registered with the County. New extraction facilities must also obtain a permit from the County. The Project would apply for an extraction permit for the new well, in compliance with the Groundwater Ordinance, and less than significant impacts are expected. These issues will be evaluated in the EIR.



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**XI. LAND USE AND PLANNING.**

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Discussion:**

**a) No Impact.** Implementation of Specific Plan would not divide an established community. No impact would occur.

**b) No Impact.** The Specific Plan Area is contained within the County’s designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development of a Specific Plan in accordance with design criteria, objectives and policies that are consistent with the County’s General Plan Land Use Element. Polaris Inc. (the Applicant) is proposing a Specific Plan for the development of the GSPA. The proposed Glamis Specific Plan (GSP) would implement the County’s objectives for the development of this area which is to accommodate recreation supporting land uses including retail and service commercial, motel accommodations, recreational vehicle and mobile home parks, and community facilities (Imperial County General Plan Land Use Element). Thus, the proposed project would be consistent with the County’s General Plan Land Use Element and there would be no impact.

**XII. MINERAL RESOURCES.**

Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Discussion:**

**a, b) No Impact.** A number of mineral resources are currently being extracted in Imperial County including gold, gypsum, sand, gravel, lime, clay, stone, kyanite, limestone, sericite, mica, tuff, salt, potash, and manganese. According to the Existing Mineral Resources Map (Figure 8) in the Conservation and Open Space Element of the County of Imperial General Plan (2016), no known mineral resources occur within the Project vicinity nor are there any mapped mineral resources within the boundary of the Project site (County of Imperial, 2016). Thus, no impacts related to the loss of availability of a known mineral resource would occur.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**XIII. NOISE.**

Would the project result in:

- |   |                                     |                          |                          |                                     |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Generation of excessive groundborne vibration or groundborne noise levels?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 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? | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Discussion:**

**a and b) Potentially Significant.** Construction activities for Specific Plan activities could result in temporary or periodic increases in noise and groundborne vibration. Construction activities include site preparation and soil compaction; roadway improvements/paving, pipeline trenching, etc. Operation activities could result in short- and long-term increases in noise vibration. Although implementation of the Specific Plan t is not expected to expose people to excessive noise or vibration levels, further analysis is warranted, and impacts are considered potentially significant. A noise report will be prepared for the Project and included in the EIR.

**c) No Impact.** The proposed project is not located within the vicinity of a private airstrip and the nearest privately-owned/public use airport, Salton Sea Airport, is located 13 miles northwest the Project Site. Additionally, the Project is not located within the Imperial County Airport Land Use Compatibility Plan (County of Imperial, 1996). For these reasons, the Project would not expose people residing or working in the area to excessive noise levels; therefore, no impact would occur.

**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 businesses) or indirectly (for example, through extension of road or other infrastructure)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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**Discussion:**

**a) Potentially Significant Unless Mitigation Incorporated.** The proposed project could result in a seasonal population growth (October through May) through the expansion of commercial and recreational activities within the Specific Plan Area. These activities would result in the development of new businesses and would require employee housing to be constructed. The proposed project allows for some limited permanent residential land uses within the project site, which consist mostly of employee housing. The proposed zoning changes allow for the development of condominiums. Thus, the proposed project could result in significant impacts from unplanned population growth, however, this population growth would be seasonal (October through May).

**b) No Impact.** There are no year-round residents within the Specific Plan Area. The proposed project would not result in the demolition of existing housing or result in the displacement of any residents.

**XV. PUBLIC SERVICES.**

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

Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

**Fire and Police ) Potentially Significant Impact Unless Mitigation Incorporated.** Fire protection services are provided to the Specific Plan Area by the County of Imperial Fire Department through the Brawley Fire Department Station, located in the City of Brawley approximately 25 miles to the east. There are existing fire hydrant connections within the “Vendor Row” area. Additional connections would be installed, as necessary to meet the needs of the GSP. During Special Events, onsite fire protection would be provided with applicable fire protection services and apparatus.

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

The County of Imperial has a Development Impact Fee (DIF) which is authorized by County of Imperial Ordinance No. 4.32. This fee is applied to all development projects in incorporated and unincorporated County of Imperial land. Payment of the DIF is required of developers to fund public facilities such as fire protection facilities and sheriff facilities. As the GSP is developed, DIF fees will be required to ensure that resources will be available for capital improvements to implement the County’s capital and operational funding of future facilities. Potential impacts on fire and police services could be potentially significant and will be evaluated in the EIR.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**Schools, Parks, and Other Public Facilities) No Impact.** Implementation of the Specific Plan would not include the provision of, or the need for, new schools, parks or other public facilities. The proposed project would not result in new long-term housing. Any new housing would be for employees of the new businesses and would be seasonal only. There would not be a permanent increase in the population. Because the Project would not result in a substantial increase in population, it does not require additional schools, parks, or other public facilities beyond that which already exists. No physical impacts related to the provision of schools, parks, or other facilities would occur.

**XVI. RECREATION.**

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment?           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Discussion:**

**a, and b) No Impact.** There are no existing neighborhood or regional parks within the Specific Plan Area. The ISDRA is located south of the Specific Plan Area. The proposed project would create a distinctive master-plan for recreation-serving land uses which are consistent with the historical use of the Glamis area and the ISDRA. However, it would not serve to increase visitation to the ISDRA. Thus, there would be no impact on existing neighborhood and regional parks or other recreational facilities. The proposed project would provide an opportunity for a variety of recreational activities to complement the established “Glamis” sand dunes experience of the surrounding ISDRA. These include an Adventure Center (offering activities such as OHV training, OHV rentals, etc.), amusement facilities, Desert Tours (off road experience), racetrack, park/playground/picnic area, and other recreational-based activities. However, construction of these facilities would be within the footprint of the Specific Plan Area and no adverse impacts to the environment would occur.

**XVII. TRANSPORTATION / TRAFFIC.**

Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
intersections) or incompatible uses (e.g., farm equipment)?				
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

**a) Less than Significant.** Implementation of the Specific Plan is anticipated to be consistent with the County of Imperial General Plan and is not anticipated to conflict with a program, plan, ordinance or policy addressing roadway, transit, bicycle or pedestrian facilities. Implementation of the Specific Plan would increase the number of vehicle trips in the area and the number of on-site personnel. However these increases are not expected to be substantial Project conflicts with applicable programs, plans, ordinance or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities will also be addressed in the EIR.

**b) Less Than Significant.** A transportation impact analysis (TIA) will be prepared for the Glamis Specific Plan to determine and evaluate traffic impacts on the local circulation system due to implementation of the Specific Plan. In compliance with Senate Bill 743 (SB 743) and CEQA Section 15064.3b, the TIA will also include an assessment of project-related changes in vehicle miles traveled compared to existing conditions and the findings presented in the EIR.

**c) Less Than Significant Impact.** The Specific Plan contains a Conceptual Circulation Plan that identifies vehicle and pedestrian access points and proposed roadway improvements including installation of a new crossing of SR-78 and installation of a traffic signal (See Figure 7, Conceptual Circulation Plan). The proposed intersection may be signalized and will provide access to the Planning Areas north and south of SR-78 (See Figure 8, Conceptual Intersection Plan). A potential OHV and pedestrian undercrossing or overcrossing is also identified for SR-78. The planned improvements will be designed to be consistent with the Imperial County Circulation Element. Design features that would result in transportation-related hazards or safety concerns are not anticipated. However, impacts related to increased hazards could be potentially significant and will be addressed in the EIR. A traffic study is being prepared and will be used to analyze potential impacts in the EIR.

**d) Potentially Significant.** Implementation of the Specific Plan would generate construction trips and the potential for temporary roadway lane closures exists. It is anticipated that emergency access would be maintained at all times, and appropriate detours would be provided, as necessary. Nonetheless, impacts related to emergency access are considered potentially significant and will be addressed in the EIR.

**XVIII. TRIBAL CULTURAL RESOURCES.**

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) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

**a) and b) Potentially Significant.** As required by SB 18 and AB 52, the Imperial County Planning and Development Services Department sent consultation notices to Native American tribal representatives regarding the proposed Project. Specifically, AB-52 Consultation notices were sent to the Quechan and Torres-Martinez Desert Cahuilla Indian Tribes. SB-18 Consultation Letters were sent to the tribes/tribal representatives listed below:

- Augustine Band of Cahuilla Mission Indians
- Campo Band of Mission Indians
- Chemehuevi Reservation
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Ewiiapaayp Tribal Office
- Fort Yuma-Quechan Indian Tribe
- Internal Tribal Cultural Resource Protection Council
- Kumeyaay Cultural Repatriation Committee
- La Posta Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Torres-Martinez Desert Cahuilla Indians,
- Native American Heritage Commission,
- Kwaaymii Laguna Band of Mission Indians

As of the date of this Initial Study, no Tribes have requested consultation. Results of any Native American consultation will be included in the EIR. As discussed under Response to Item V. Cultural Resources, implementation of the Specific Plan could have potentially significant impacts to archaeological resources, which could be considered a significant resource to a California Native American tribe.

**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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
development during normal, dry and multiple dry years?				
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

**a) Potentially Significant Impact.** The Specific Plan would include the expansion of existing water and wastewater facilities along with the development of additional infrastructure to properly accommodate the large volume of visitors to the Specific Plan Area. The GSP will allow for the development of utility buildings, utility substation(s), and water/wastewater treatment facilities. The proposed project would also allow for the development of a solar energy generation facilities (including battery storage) located throughout the Specific Plan Area as well as the addition of a 7.2 mile long electrical transmission / distribution line to bring power to the Specific Plan Area. The Conceptual Drainage and Grading plan would provide flood protection for future land uses within the entire Specific Plan Area and release the drainage to the southwest. Construction of the infrastructure improvements could cause significant environmental effects which will be addressed in the EIR.

**b) Potentially Significant Impact Unless Mitigation Incorporated.** Currently two wells provide water to the Specific Plan Area and additional water is trucked in during periods of high visitation such as Camp RZR. The proposed project would include a CUP for modification of the existing well. An SB-610 Water Supply Assessment will be prepared to assess the impact to water supplies in the Specific Plan Area. This issue will be addressed in the EIR.

**c) Potentially Significant Impact.** Wastewater treatment for the existing Specific Plan Area is provided by an on-site septic system and leach field. Implementation of the Specific Plan would result in the need for expanded wastewater treatment options. This issue will be addressed in the EIR.

**d) Less than Significant Impact.** Implementation of the Specific Plan would result in an increase in solid waste generation during construction and operation. Solid waste would be disposed of using a locally-licensed waste hauling service. It is anticipated that solid waste would continue to be hauled to the landfill nearest the Planning Area. The Salton City Solid Waste Site (13-AA-0011) is located at 935 W. Highway 86 Salton City, CA 92275. As of September 2018, this landfill had approximately 1,264,170 cubic yards of remaining capacity and was



Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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estimated to remain in operation through 2038 (CalRecycle, 2019b). Solid waste generation associated with implementation of the Specific Plan will be addressed in the EIR.

**e) No Impact.** The Applicant will comply with federal, state and local statutes related to solid waste. No impacts would occur.

**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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Discussion:**

**a) No Impact.** According to the Draft Fire Hazard Severity Zone Map for Imperial County prepared by the California Department of Forestry and Fire Protection, the Specific Plan Area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). As noted under Hazards and Hazardous Materials (Response IX. f) the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

**b) No Impact.** The Specific Plan Area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

**c) No Impact.** The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that would

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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result in temporary or ongoing impacts to the environment. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

**d) Less than Significant.** The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact is identified for this issue area and this environmental parameter is not proposed for further analysis in the EIR.

*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 – CEQA

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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### SECTION 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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 project, and the effects of probable future projects.)  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

**a) Potentially Significant Impact.** The EIR’s biological resources section will discuss direct and indirect impacts on plants, fish and wildlife species. The EIR will also evaluate direct and indirect impacts on cultural and tribal cultural resources. Finally, the EIR will evaluate the Specific Plan’s contribution to cumulative impacts, identify whether the contribution is cumulatively considerable, and propose feasible mitigation, as appropriate, to reduce such impacts to less-than-significant levels.

**b) Potentially Significant Impact.** The Project has the potential to contribute to cumulative impacts related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation and traffic, tribal cultural resources, and utilities and service systems. The EIR will evaluate the project’s contribution to cumulative impacts in these areas as well as other areas as further impacts are identified.

**c) Potentially Significant Impact.** The Project could potentially result in environmental effects that have adverse impacts on human beings, either directly or indirectly. These impacts will be fully addressed in the EIR.

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## SECTION IV. PERSONS & ORGANIZATIONS CONSULTED/ REFERENCES

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### A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Asst. Director of Planning & Development Services
- Patricia Valenzuela, Planner IV
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Agricultural Commissioner
- Environmental Health Services
- Sheriff's Office

### B. OTHER AGENCIES/ORGANIZATIONS

- CDFW
- USFWS
- Caltrans

### C. REFERENCES

Altum Group, 2020. Visual Impact Analysis, Glamis Specific Plan. March 26.

ASM Affiliates, 2019. Draft Class III Cultural Resources Inventory Report for the Glamis Specific Plan Project, Glamis, Imperial County, California. July.

Barrett Biological Consulting, 2019. Glamis Property Specific Plan, Biological Resources Assessment Technical Report Glamis, California. July.

California Dept. of Conservation, 2016a. Imperial County Farmland and Monitoring Program (FMMP) Imperial County Important Farmland 2016. Available at: (<https://maps.conservation.ca.gov/DLRP/CIFF/>). Accessed September 24, 2020.

\_\_\_\_\_, 2016b. Imperial County Williamson Act Map, FY 2016/2017. Available at: [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Imperial\\_16\\_17\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Imperial_16_17_WA.pdf). Accessed October 8, 2019.

California Department of Forestry and Fire Protection, 2007. Fire Hazards and Severity Zones Map, Imperial County.

County of Imperial, 2016. Final Conservation and Open Space Element of the Imperial County General Plan. Adopted by the Imperial County Board of Supervisors, March 8, 2016. Available at:

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<http://www.icpds.com/CMS/Media/Conservation-&Open-Space-Element-2016.pdf>. Accessed September 24, 2020.

\_\_\_\_\_, 2015. Final Land Use Element. Adopted by the Imperial County Board of Supervisors, October 6, 2015. Available at: [http://www.icpds.com/CMS/Media/Land-Use-Element-\(2015\).pdf](http://www.icpds.com/CMS/Media/Land-Use-Element-(2015).pdf). Accessed September 24, 2020.

Earth Systems Pacific, 2019. Geotechnical Engineering Feasibility Report Proposed Glamis Specific Plan Project State Highway 78 and the Union Pacific Railroad Glamis, Imperial County, California. August 29.

LdN Consulting, 2020a. Air Quality Assessment, Glamis Specific Plan, County of Imperial. March 1.

LdN Consulting, 2020b. Greenhouse Gas Screening Letter, Glamis Specific Plan, County of Imperial. March 1.

LdN Consulting, 2020c. Noise Assessment, Glamis Specific Plan, County of Imperial. March 1.

San Diego Natural History Museum, 2019. Paleontological Resources Assessment. January.

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## Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

<b>SCH #</b>
--------------

**Project Title:** \_\_\_\_\_  
 Lead Agency: \_\_\_\_\_ Contact Person: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ Phone: \_\_\_\_\_  
 City: \_\_\_\_\_ Zip: \_\_\_\_\_ County: \_\_\_\_\_

**Project Location:** County: \_\_\_\_\_ City/Nearest Community: \_\_\_\_\_  
 Cross Streets: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_° \_\_\_\_\_' \_\_\_\_\_" N / \_\_\_\_\_° \_\_\_\_\_' \_\_\_\_\_" W Total Acres: \_\_\_\_\_  
 Assessor's Parcel No.: \_\_\_\_\_ Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
 Within 2 Miles: State Hwy #: \_\_\_\_\_ Waterways: \_\_\_\_\_  
 Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: \_\_\_\_\_

**Document Type:**

CEQA: <input type="checkbox"/> NOP	<input type="checkbox"/> Draft EIR	NEPA: <input type="checkbox"/> NOI	Other: <input type="checkbox"/> Joint Document
<input type="checkbox"/> Early Cons	<input type="checkbox"/> Supplement/Subsequent EIR	<input type="checkbox"/> EA	<input type="checkbox"/> Final Document
<input type="checkbox"/> Neg Dec	(Prior SCH No.) _____	<input type="checkbox"/> Draft EIS	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Mit Neg Dec	Other: _____	<input type="checkbox"/> FONSI	_____

**Local Action Type:**

<input type="checkbox"/> General Plan Update	<input type="checkbox"/> Specific Plan	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision, etc.)	<input type="checkbox"/> Other: _____

**Development Type:**

<input type="checkbox"/> Residential: Units _____ Acres _____	<input type="checkbox"/> Transportation: Type _____
<input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Mining: Mineral _____
<input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Power: Type _____ MW _____
<input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Waste Treatment: Type _____ MGD _____
<input type="checkbox"/> Educational: _____	<input type="checkbox"/> Hazardous Waste: Type _____
<input type="checkbox"/> Recreational: _____	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Water Facilities: Type _____ MGD _____	

**Project Issues Discussed in Document:**

<input type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input type="checkbox"/> Recreation/Parks	<input type="checkbox"/> Vegetation
<input type="checkbox"/> Agricultural Land	<input type="checkbox"/> Flood Plain/Flooding	<input type="checkbox"/> Schools/Universities	<input type="checkbox"/> Water Quality
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input type="checkbox"/> Water Supply/Groundwater
<input type="checkbox"/> Archeological/Historical	<input type="checkbox"/> Geologic/Seismic	<input type="checkbox"/> Sewer Capacity	<input type="checkbox"/> Wetland/Riparian
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Minerals	<input type="checkbox"/> Soil Erosion/Compaction/Grading	<input type="checkbox"/> Growth Inducement
<input type="checkbox"/> Coastal Zone	<input type="checkbox"/> Noise	<input type="checkbox"/> Solid Waste	<input type="checkbox"/> Land Use
<input type="checkbox"/> Drainage/Absorption	<input type="checkbox"/> Population/Housing Balance	<input type="checkbox"/> Toxic/Hazardous	<input type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Economic/Jobs	<input type="checkbox"/> Public Services/Facilities	<input type="checkbox"/> Traffic/Circulation	<input type="checkbox"/> Other: _____

**Present Land Use/Zoning/General Plan Designation:** \_\_\_\_\_

**Project Description:** (please use a separate page if necessary)

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.



## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans District # _____	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Regional WQCB # _____
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input type="checkbox"/> Fish & Game Region # _____	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date \_\_\_\_\_ Ending Date \_\_\_\_\_

### Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

# Summary Form for Electronic Document Submittal

**Form F**

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: \_\_\_\_\_

Project Title: Glamis Specific Plan Project

Lead Agency: Imperial County Planning & Development Services Department

Contact Name: Patricia Valenzuela

Email: patriciavalenzuela@co.imperial.ca.us

Phone Number: (442) 265-1736

Project Location: Glamis  
*City*

Imperial  
*County*

Project Description (Proposed actions, location, and/or consequences).

The proposed project consists of the Glamis Specific Plan (GSP) to guide development within the unincorporated community of Glamis, California in the eastern portion of Imperial County. Centered around the Glamis Beach Store, 143 acre Specific Plan Area is generally bounded by the Imperial Sand Dunes Recreation Area (ISDRA) on the south and by the North Algodones Dunes Wilderness (NADW) on the north. The Specific Plan area is approximately 27 miles east of the City of Brawley and 20 miles north of I-8. The GSP is intended to enhance the experience of existing recreational users of the adjacent areas and implement the County's objectives for the area by facilitating development of recreation-serving land uses and required infrastructure. Permitted uses within the GSP include recreational, commercial/retail, OHV and RV storage, entertainment and hospitality uses, seasonal guest and employee housing, renewable energy, infrastructure, and a research and development facility for Polaris (Project Applicant).

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

Potential impacts to: Aesthetics/Visual Resources; Air Quality and Greenhouse Gas Emissions, Biological Resources; Cultural Resources, Geology /Soils (including Paleontological Resources); Hazards and Hazardous Materials, Land Use and Planning, Noise, Population/Housing, Public Services and Facilities; Recreation; Transportation/Traffic; and Tribal Cultural Resources.

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Potential vehicle trips that would be generated by the permitted uses and project-related changes in vehicle miles traveled.

Provide a list of the responsible or trustee agencies for the project.

U.S. Army Corps of Engineers  
California Department of Transportation (Encroachment Permit)  
California Dept. of Fish & Wildlife (CDFW)  
State Water Resources Control Board  
Regional Water Quality Control Board (Region 8)  
Imperial County Air Pollution Control District  
Imperial County Division of Environmental Health (Domestic Water Supply Permit for the Public Water System)