

PROJECT REPORT

TO: PLANNING COMMISSION

AGENDA DATE: November 12, 2025

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME: 9:00 AM/ No.2

PROJECT TYPE: Picacho Road Bridge Replacement
Initial Study #24-0037 SUPERVISOR DIST # 5

LOCATION: Picacho Road Bridge APN: 056-600-011-000

Winterhaven, CA 92283 PARCEL SIZE: N/A

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

ZONE (existing) Native American (County Right of Way) ZONE (proposed) N/A

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

PLANNING COMMISSION DECISION:

HEARING DATE: 11/12/2025

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION:

HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 02/27/2025

INITIAL STUDY: #24-0037

☐ NEGATIVE DECLARATION ☒ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

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

IID (Imperial Irrigation District), CDFW (California Department of Fish and Wildlife)

REQUESTED ACTION:

IT IS RECOMMENDED THAT YOU CONDUCT A PUBLIC HEARING AND THAT YOU HEAR ALL THE OPPONENTS AND PROPONENTS OF THE PROPOSED PROJECT. STAFF WOULD THEN RECOMMEND THAT YOU TAKE THE FOLLOWING ACTIONS:

- 1) APPROVE THE RESOLUTION ADOPTING THE MITIGATED NEGATIVE DECLARATION BY FINDING THAT THE PROPOSED PROJECT WOULD NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS RECOMMENDED AT THE ENVIRONMENTAL EVALUATION COMMITTEE (EEC) HEARING HELD ON FEBRUARY 27, 2025.**

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

LB/AT/S:\AllUsers\APN\056\600\011\IS24-0037\PC\IS24-0037 PROJECT REPORT.docx

STAFF REPORT
PLANNING COMMISSION MEETING
November 12, 2025

Project Name: **Initial Study #24-0037**
 Picacho Road Bridge Replacement

Applicant: **Imperial County Public Works**
 155 South 11th Street,
 El Centro, CA 92243

Project Location:

The proposed project site is located at Picacho Bridge over Yuma Main Canal (Picacho Road, Winterhaven, CA 32.7358 N, 114.6241 W and within APN 056-600-011-000). The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the townsite of Winterhaven in Imperial County, California. Specifically, the project site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks.

Project Summary:

The applicant is proposing to replace the existing Picacho Road Bridge which leads into the Townsite of Winterhaven, due to cracking and outliving its useful life. The existing timber bridge must be replaced to support commerce, continue access to the Quechan Reservation and the Bard community, as well as provide safer crossing of the Yuma Main Canal.

Environment Setting:

The project site and surrounding areas are designated as Agricultural and Urban by the Imperial County General Plan and zoned as Native American (Indian Reservation), R-1 (Low Density Residential), R-2 (Medium Density Residential), R-3 (Medium High Density Residential), R-4 (Mobile Home Park /High Density Residential) and Medium Commercial. The project would comply with the Imperial County's Land Use Ordinance as well as remain consistent with the Imperial County General Plan Land Use Designation.

Land Use Analysis:

The project site is designated as "Agriculture" under the Land Use Element of the General Plan and identified as Native American (Indian Reservation) per Imperial County Land

Use Ordinance (Title 9), zoning map 70. The project was found consistent with the General Plan and with the Imperial County Land Use Ordinance.

Surrounding Land Use Ordinance:

DIRECTION	CURRENT LAND USE	ZONING	GENERAL PLAN
Project Site	Indian Reservation	NAT AMER	Agriculture
North	Indian Reservation	NAT AMER	Agriculture
South	Indian Reservation	NAT AMER	Agriculture
East	Indian Reservation	NAT AMER	Agriculture
West	Indian Reservation, Residential, Commercial	NAT AMER, R-1, R-2, R-3, R-4, C-2	Agriculture, Urban Area

Environmental Review:

The proposed project was environmentally assessed and reviewed by the Environmental Evaluation Committee (EEC). The Committee consists of a seven (7) member panel, integrated by the Director of Environmental Health Services, Imperial County Fire Chief, Agricultural Commissioner, Air Pollution Control Officer, Director of the Department of Public Works, Imperial County Sheriff, and the Director of Planning and Development Services. The EEC members have the principal responsibility for reviewing CEQA documents for the County of Imperial. On February 27, 2025, after review by the EEC members, the members recommended a Mitigated Negative Declaration.

The project was publicly circulated from March 05, 2025, through April 10, 2025, comments were received, reviewed and made part of this project.

Staff Recommendation:

Staff recommends that the Planning Commission hold a public hearing, hear all the proponents and opponents of the proposed project, and then take the following actions:

1. Approve the Resolution adopting the Mitigated Negative Declaration by finding that the proposed project would not have a significant effect on the environment as recommended at the Environmental Evaluation Committee (EEC) hearing held on February 27, 2025.

Prepared By: Luis Bejarano, Planner II
Planning & Development Services



Reviewed By: Michael Abraham, AICP, Assistant Director
Planning & Development Services



Approved By: Jim Minnick, Director
Planning & Development Services

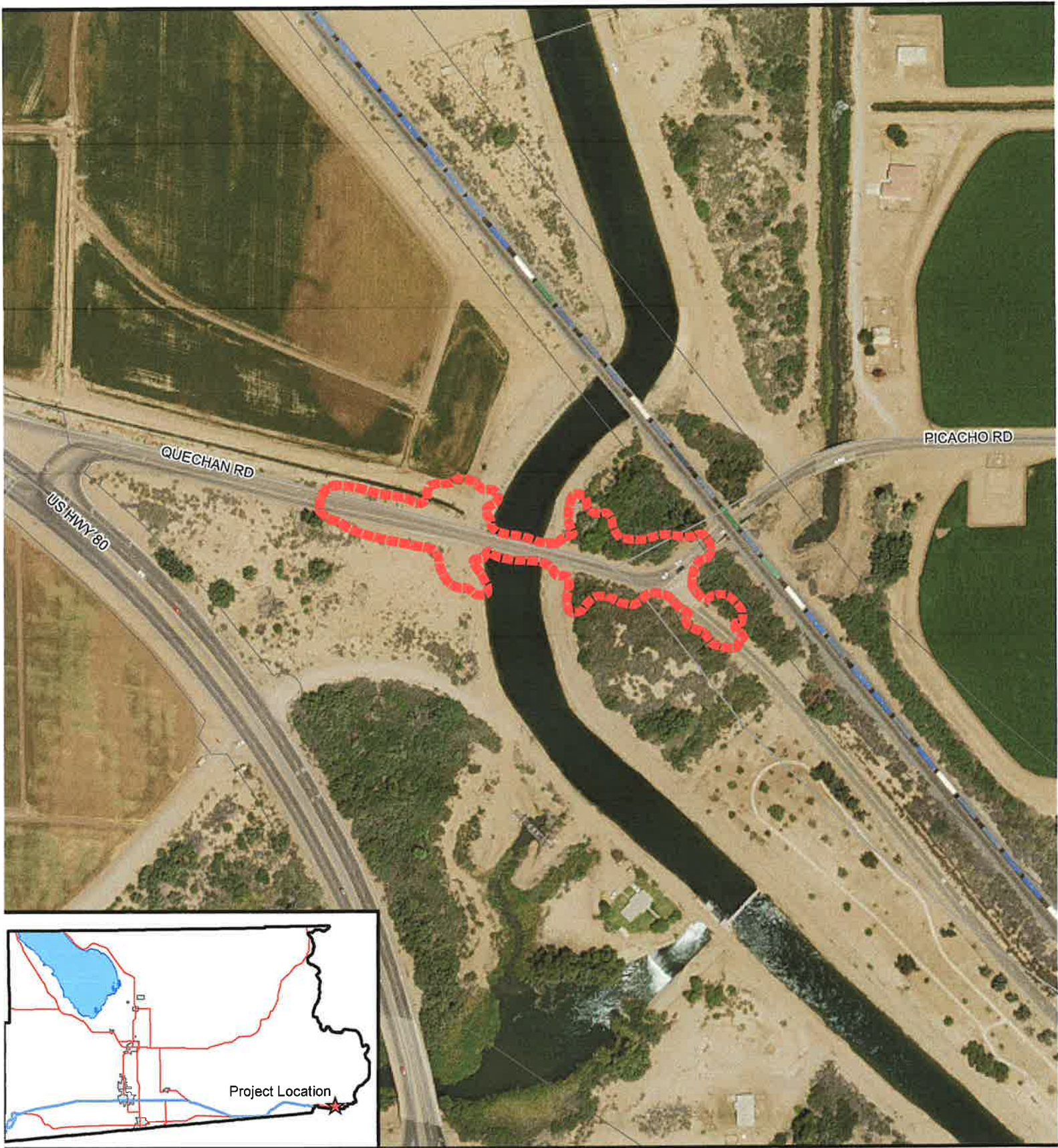


Attachments:

- A. Vicinity Map
- B. Site Plan
- C. CEQA Resolutions
- D. Environmental Evaluation Committee package
- E. Comment Letters
- F. Revised Initial Study and MMRP
- G. Response to Comment Letters

ATTACHMENT “A” - VICINITY MAP

PROJECT LOCATION MAP

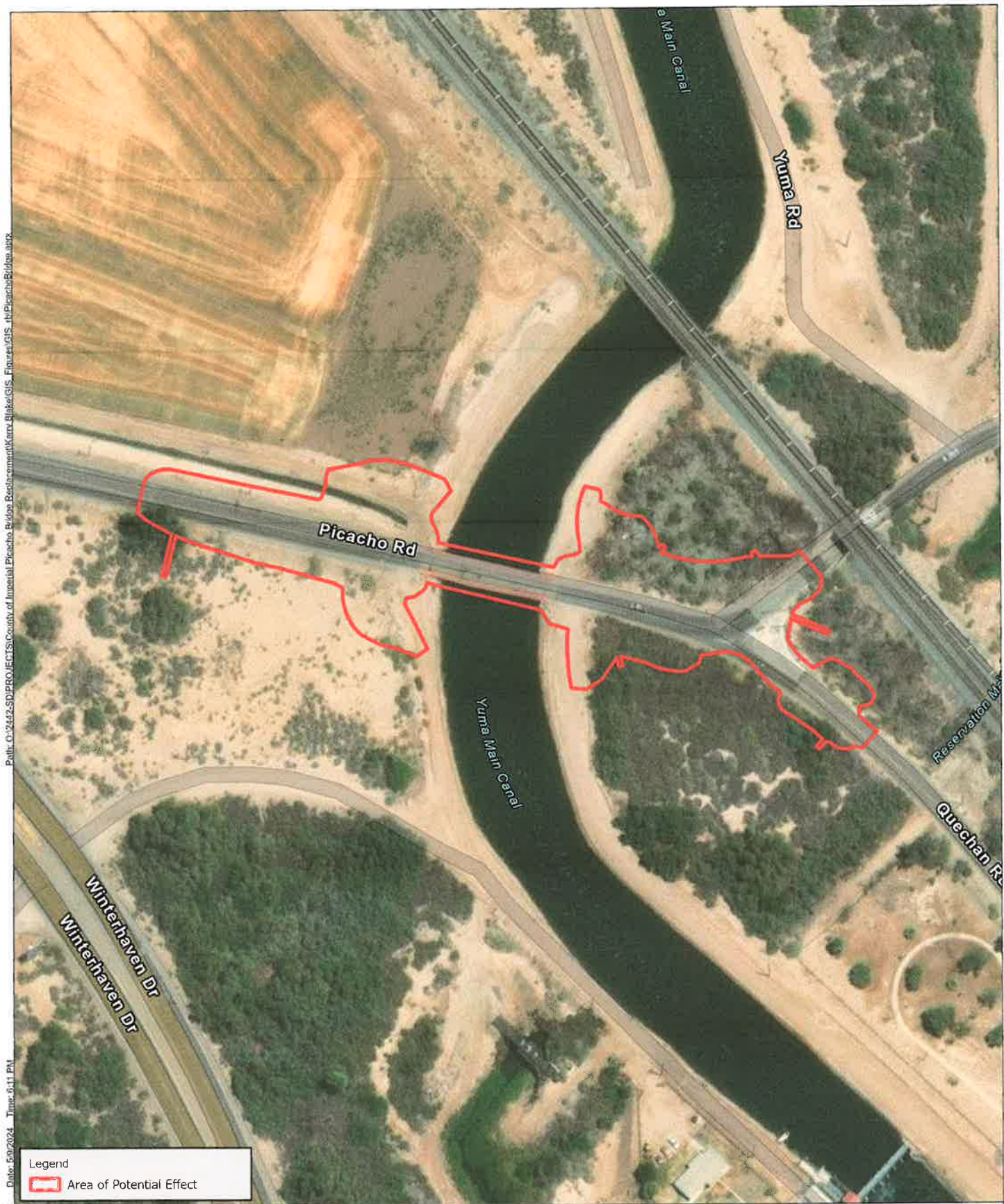


**PICACHO RD
BRIDGE REPLACEMENT
IS #24-0037**

-  Project Location
-  Centerline
-  Parcels

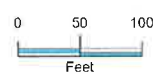


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Legend

 Area of Potential Effect



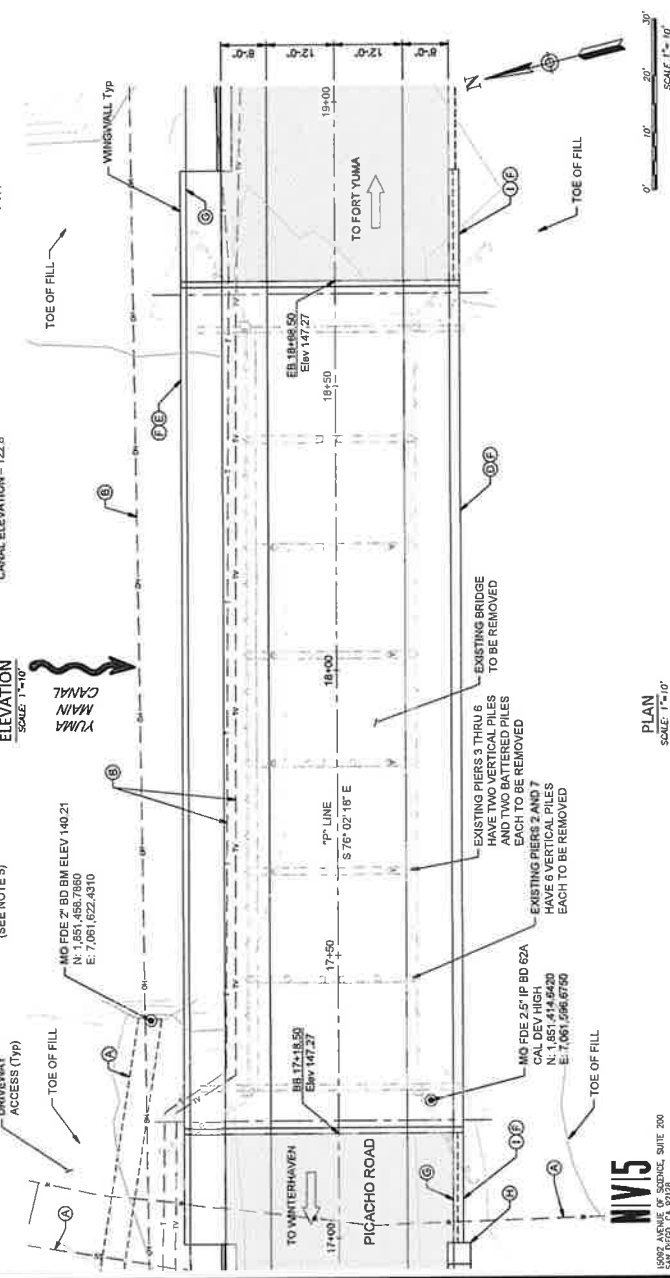
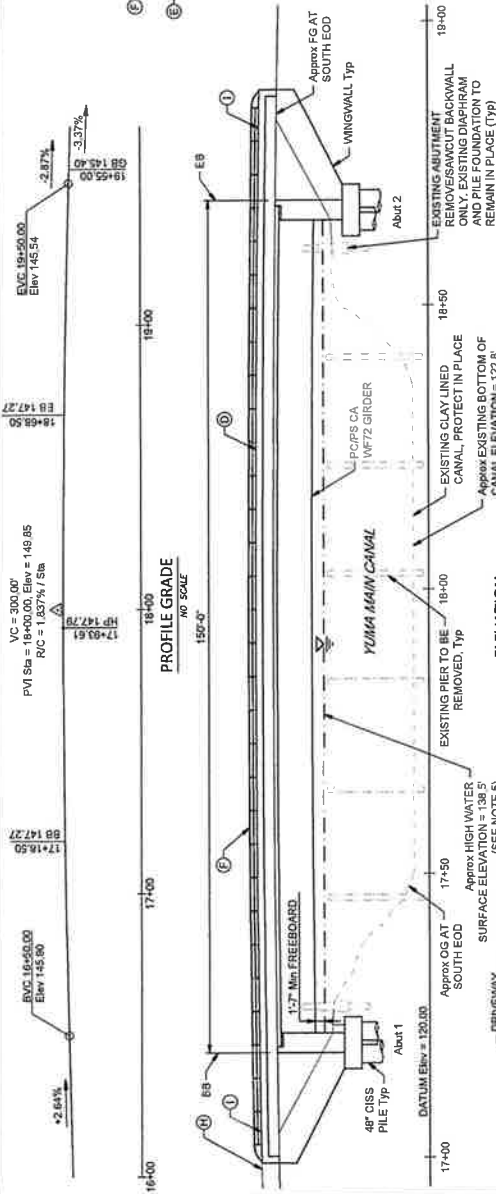
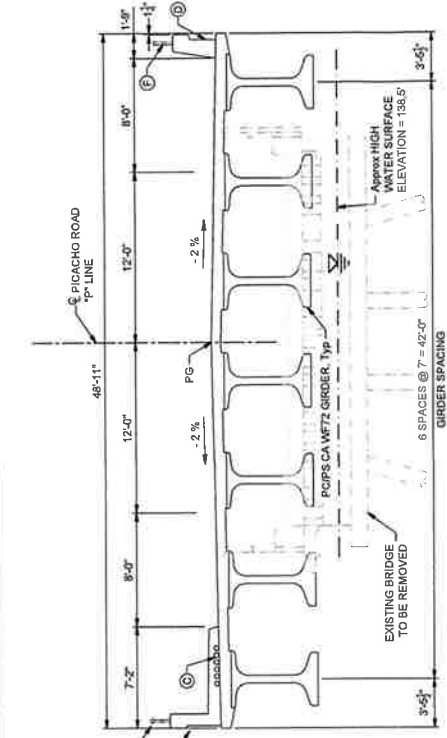
DRAWING INFO	
Job # :	227521-0001136.00
Author:	R Brownell
Scale:	1:1,800, 1 in = 150 ft

**AERIAL PROJECT OVERVIEW MAP
PICACHO BRIDGE REPLACEMENT PROJECT
PUBLIC WORKS, COUNTY OF IMPERIAL**



5/9/2024

ATTACHMENT “B” – SITE PLAN



INDEX TO BRIDGE PLANS

- | NOTES | |
|-------|--|
| (A) | Existing utility to be protected in place |
| (B) | Existing utility to be relocated |
| (C) | 4" Opening for utilities |
| (D) | Concrete Barrier Type 636 |
| (E) | Concrete Barrier Type 732SW |
| (F) | Tubular Handrailing |
| (G) | Paint "YUJIMA MAIN (PICACHO RD)
BR. NO. 58C-02X01
[YEAR CONSTRUCTED] |
| (H) | Crash Cushion, see Roadway Plans |
| (I) | Concrete Barrier Type 636A |
| NOTES | |

1. THE CONTRACTOR SHALL VERIFY ALL CONTROLLING FIELD DIMENSIONS BEFORE ORDERING OR FABRICATING ANY MATERIAL.
2. THE EXISTING CLAY LINER CANAL MUST BE PROTECTED IN PLACE DURING ALL CONSTRUCTION ACTIVITIES.
3. THE CONTRACTOR MUST REMOVE THE EXISTING PILES AT THE PIERS WITHIN THE CANAL. FLUSH WITH THE EXISTING CANAL PRISM IN SUCH A WAY THAT THE CANAL, INCLUDING ITS FOUNDATION IS PROTECTED.
4. ANY MODIFICATION TO THE CANAL PRISM MUST BE BROUGHT TO ITS ORIGINAL OR BETTER CONDITION AND SHALL BE REVIEWED AND APPROVED BY THE BUREAU OF RECLAMATION AND YUMA COUNTY WATER USERS ASSOCIATION PRIOR TO THE CONTRACTOR COMMENCING WORK.
5. THE APPROXIMATE HIGH WATER SURFACE ELEVATION WAS PROVIDED BY YUMA COUNTY WATER USERS ASSOCIATION.

LEGEND

	Existing Bridge
	Direction of Flow
	Existing Bridge
	Proposed Pavement

[illegible]

ATTACHMENT “C” – CEQA RESOLUTIONS

RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION FOR THE COUNTY OF IMPERIAL, CALIFORNIA, ADOPTING THE “MITIGATED NEGATIVE DECLARATION” FOR INITIAL STUDY (IS) #24-0037, IMPERIAL COUNTY PUBLIC WORKS DEPARTMENT

WHEREAS, on February 18, 2025, a Public Notice was mailed to the surrounding property owners advising them of the Environmental Evaluation Committee hearing scheduled for February 27, 2025; and,

WHEREAS, a Mitigated Negative Declaration and CEQA findings were prepared in accordance with the requirements of the California Environmental Quality Act, State Guidelines, and the County’s “Rules and Regulations to Implement CEQA, as Amended”; and,

WHEREAS, the Environmental Evaluation Committee recommended to the Planning Commission of the County of Imperial to adopt the Mitigated Negative Declaration for IS #24-0037; and,

WHEREAS, the Mitigated Negative Declaration was circulated for 35 days March 05, 2025, to April 10, 2025; and,

WHEREAS, the Planning Commission of the County of Imperial has been designated with the responsibility of adoptions and certifications; and,

NOW, THEREFORE, the Planning Commission of the County of Imperial **DOES HEREBY RESOLVE** as follows:

The Planning Commission has reviewed the attached Mitigated Negative Declaration (MND) prior to adoption. The Planning Commission finds and determines that the Mitigated Negative Declaration is adequate and prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA) which analyzes the project’s environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein are true, correct, and valid;
2. That the Planning Commission has reviewed the attached Mitigated Negative Declaration (MND) for the proposed project and considered the information contained in the Mitigated Negative Declaration together with all comments received during the public review period and prior to adopting the MND; and,
3. That the Mitigated Negative Declaration reflects the Planning Commission independent judgment and analysis.

NOW, THEREFORE, the County of Imperial Planning Commission **DOES HEREBY ADOPT** the Mitigated Negative Declaration for Initial Study #24-0037.

**Rudy Schaffner, Chairperson
Imperial County Planning Commission**

I hereby certify that the preceding Resolution was taken by the Planning Commission at a meeting conducted on **November 12, 2025**.

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

**Jim Minnick, Director of Planning & Development Services
Secretary to the Imperial County Planning Commission**

**ATTACHMENT “D” – ENVIRONMENTAL EVALUATION
COMMITTEE PACKAGE**

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: February 27, 2025

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME 1:30 PM / No.1

PROJECT TYPE: Picacho Road Bridge Replacement SUPERVISOR DIST #5
IS#24-0037
LOCATION: Picacho Road Bridge APN: 056-600-011-000
Winterhaven, CA 92283 PARCEL SIZE: N/A

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

ZONE (existing) Native American (NAT AMER) ZONE (proposed) N/A

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

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 02/27/2025

INITIAL STUDY: #24-0037

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

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

Imperial Irrigation District (IID), CEO, Quechan Indian Tribe,
CALTRANS

REQUESTED ACTION:

(See Attached)

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

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EEC ORIGINAL PKG

☐ **NEGATIVE DECLARATION**
☒ **MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis
For:*

**IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL
INITIAL STUDY (IS) # 24-0037**



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

January 2025

EEC ORIGINAL PKG

TABLE OF CONTENTS

	<u>PAGE</u>
 <u>SECTION 1</u>	
I. INTRODUCTION	6
 <u>SECTION 2</u>	
II. ENVIRONMENTAL CHECKLIST	11
PROJECT SUMMARY	15
ENVIRONMENTAL ANALYSIS	19
 I. AESTHETICS.....	
II. AGRICULTURE AND FOREST RESOURCES.....	20
III. AIR QUALITY.....	21
IV. BIOLOGICAL RESOURCES.....	25
V. CULTURAL RESOURCES.....	27
VI. ENERGY.....	27
VII. GEOLOGY AND SOILS.....	28
VIII. GREENHOUSE GAS EMISSION.....	30
IX. HAZARDS AND HAZARDOUS MATERIALS.....	32
X. HYDROLOGY AND WATER QUALITY.....	33
XI. LAND USE AND PLANNING.....	35
XII. MINERAL RESOURCES.....	36
XIII. NOISE.....	37
XIV. POPULATION AND HOUSING.....	39
XV. PUBLIC SERVICES.....	40
XVI. RECREATION.....	41
XVII. TRANSPORTATION.....	42
XVIII. TRIBAL CULTURAL RESOURCES.....	43
XIX. UTILITIES AND SERVICE SYSTEMS.....	43
XX. WILDFIRE.....	44
 <u>SECTION 3</u>	
III. MANDATORY FINDINGS OF SIGNIFICANCE	48
IV. PERSONS AND ORGANIZATIONS CONSULTED	49
V. REFERENCES	50
VI. MITIGATED NEGATIVE DECLARATION - COUNTY OF IMPERIAL	60
VII. FINDINGS	61
 <u>SECTION 4</u>	
VIII. RESPONSE TO COMMENTS (IF ANY)	62
IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)	63

TABLES

Table 1: Significance Thresholds for Criteria Pollutants	22
Table 2: Air Quality Standards and Designations for Project Area within the Salton Sea Air Basin	23
Table 3: Project Maximum Daily Construction Emissions (pounds/day).....	24
Table 4: Construction GHG Emissions.....	30
Table 5: Consistency with CARB's 2017 Scoping Plan Measures for Individual Projects.....	31
Table 6: Existing Noise Sources in Project Site.....	36
Table 7: Construction Equipment Noise Levels.....	37
Table 8: Imperial County Population Inventory.....	38
Table 9: Unincorporated Imperial County Demographic Composition.....	39

Exhibits

Exhibit A: Project Vicinity.....	15
Exhibit B: Project Location and Footprint.....	16
Exhibit C: Bridge Design.....	17
Exhibit D: Project Site and Nearest Sensitive Receptors.....	37

APPENDICES

Appendix A - Construction Details & CalEEMod Report	
Appendix B - Biological Resources Survey	
Appendix C - Cultural Report	

Acronyms and Abbreviations

AB	Assembly Bill
AFY	Acre-Feet Per Year
AQMP	Air Quality Management Plan
ARMR	Archaeological Resource Management Reports
ATSM	American Society for Testing and Materials
BLM	Bureau of Land Management
BMP	Best Management Practices
BOR	Bureau of Reclamation
CAAQS	California Ambient Air Quality Standards
CALFIRE	California Department of Forestry and Fire Protection
Cal-EPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, And Liability Act
CFR	Code of Federal Regulations
CH ₄	Methane
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COSFM	California Office of the State Fire Marshall
CRHR	California Register of Historical Resources
CWA	Clean Water Act
CY	Cubic Yards
dB	Decibels
dBA	A-weighted Decibels
DOC	California Department of Conservation
DWR	Department of Water Resources
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
GHG	Greenhouse Gas
GWP	Global Warming Potential
HCP / NCCP	Habitat Conservation Plan / Natural Community Conservation Plan
HP	Horsepower
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
in/sec	Inches per second
IPCC	Intergovernmental Panel on Climate Change
Lbs	Pounds
Leq	Energy Equivalent or Energy Average Level

LID	Low Impact Development
Lmax	Maximum A-weighted Sound Level
LRA	Local Responsibility Area
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resources Zones
N2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAV	Navigation
NO2	Nitrogen Dioxide
Nox	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O3	Ozone
O&M Plan	Operations and Maintenance Plan
PEIR	Programmatic Environmental Impact Report
PM	Particulate Matter
PM _{2.5}	2.5 Fine Particulate Matter
PM ₁₀	Respirable Particulate Matter
PMM	Program Mitigation Measure
PPV	Peak Particle Velocity
RARE	Rare, Threatened, or Endangered Species
ROW	Right-of-Way
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VdB	Vibration Level in Decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
CDFW WL	CDFW Watchlist
YCWUA	Yuma County Water Users' Association

SECTION 1 INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Picacho Road Bridge Replacement Project at Yuma Main Canal. (Refer to Exhibits A, B, and C).

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

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

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

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

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

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

This Initial Study has determined that the proposed Project will result in any potentially significant environmental impacts and, therefore, a Mitigated Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

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

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

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

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

D. CONTENTS OF INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than 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.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this Initial Study and Mitigated Negative Declaration.

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

VI. MITIGATED NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

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

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

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

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

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

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

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

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

Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. Environmental Checklist

1. **Project Title:** Imperial County Project No. 6811, Picacho Road Bridge Replacement Project at Yuma Main Canal, Initial Study (IS) # 24-0037.

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

3. **Contact person and phone number:** Luis Bejarano, Planner I, (442) 265-1736

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

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

6. **Project location:** The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County. The Project Site is approximately 0.3 miles south of Interstate 8 (I-8), 0.6 miles east of First Street, and approximately 6 miles southeast of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).

7. **Project sponsor's name and address:** Imperial County Public Works Department, 155 S. 11th Street, El Centro, CA 92243.

8. **General Plan designation:** Surrounding the proposed Project is the Fort Yuma Indian Reservation which is designated as Agriculture in the County's General Plan. The project area supports the Yuma Main Canal, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The Bureau of Reclamation (BOR) owns the Yuma Main Canal. Imperial County has an easement and provides transportation for the population over the canal.

9. **Zoning:** The Fort Yuma Indian Reservation lands are zoned Native American.

10. **Description of project:** The proposed Project is located at Picacho Bridge over Yuma Main Canal (Picacho Road, Winterhaven, CA 32.7358 N, 114.6241 W and within APN 056-600-011) and is intended to replace the existing bridge leading into the Townsite of Winterhaven in Supervisorial District 1. The proposed Project presents a unique opportunity to construct a modern bridge that implements Best Management Practices (BMPs) concurrently with transportation amenities. Due to cracking and outliving its useful life, the existing wood bridge must be replaced to support commerce, access to the Quechan Reservation and the Bard community, and provide a safer crossing of the Yuma Main Canal. The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association.

Due to its deteriorating condition, it is proposed to replace the existing bridge with a new Precast Prestressed Concrete Girder Bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to avoid the inadvertent release of debris or fill into the canal. The roadway profile is proposed to be raised to approximately 5 feet-4 inches higher than the existing condition, achieving a minimum of 2 feet of vertical clearance over the existing canal bank elevation per the BOR's *Engineering and O&M Guidelines for Crossings*.

The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders,

and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge.

11. Surrounding land uses and setting: The project is located along Picacho Rd. (S-24) 0.4- miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East. The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. At 130 ft (40 m) above sea level, the project is located 0.4 miles north of the Colorado River. The Cargo Muchacho Mountains are 8.5 miles to the northwest, the Algodones Dunes are 13 miles to the west, and the Laguna and Gila Mountains are 11 miles to the east. The project is in the southeastern portion of the Colorado Desert Province and within the Lower Colorado/Gila River Valleys Ecoregion. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation.

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Planning Commission

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

The lead CEQA agency must begin the Assembly Bill (AB) 52 consultation process prior to the release of a ND, MND, or EIR. The AB 52 consultation process shall begin with the Lead Agency (ICPDS) providing written notification to California Native American Tribes who identify as being traditionally and culturally affiliated with the Proposed Project area. The written notification includes a brief description of the Proposed Project, including the location, the Lead Agency's contact information, and notification that the California Native American Tribe has 30 days to request consultation, per AB 52. Upon receipt of a written response from a California Native American Tribe requesting consultation, the Lead Agency and the California Native American Tribe(s) requesting consultation shall begin AB 52 consultation.

The proposed project occurs within the Fort Yuma Indian Reservation thus tribal consultation was undertaken with the Fort Yuma Quechan Tribe. A meeting was facilitated between the Bureau of Reclamation, Fort Yuma Quechan Historic Preservation Office (Quechan HPO), and NV5 to discuss requirements for conducting cultural resource projects on Tribal land in Spring 2021. Quechan HPO was granted for the completion of the California Historical Resources Information System search in Summer 2021. Quechan THPO staff did not indicate any concern about Traditional Cultural Places within the proposed project area. In October 2022, prior to conducting fieldwork, a Plan of Work for the cultural resource survey was provided to the Quechan THPO to present to the Tribal Council for approval. After receipt of approval, fieldwork was completed on October 12, 2022. (See Appendix C). The AB 52 consultation process was conducted by Imperial County Planning and Development Services between October 16, 2024, to November 15, 2024 and although no formal letter response was received by Tribes, the Quechan Indian Tribe did express interest via telephone conversation. If response comments are received from the Quechan Indian Tribe, or other Native American interests, such comments will be acknowledged by the County and will be incorporated within this Initial Study as appropriate.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

- ☐ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ Found that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EEC VOTES

PUBLIC WORKS
ENVIRONMENTAL HEALTH SVCS
OFFICE EMERGENCY SERVICES
APCD
AG
SHERIFF DEPARTMENT
ICPDS

YES

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NO

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ABSENT

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Jim Minnick, Director of Planning/EEC Chairman


Date: 2-27-2028

PROJECT SUMMARY

A. Project Location: The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County, (Exhibit A, Project Vicinity and Exhibit B, Project Location and Footprint). The Project Site is approximately 0.3 miles south of Interstate 8 (I-8), 0.6 miles east of First Street, and approximately 6 miles southeast of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).

B. Project Summary: The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association. The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders, and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge.

The newly designed bridge will have a minimum freeboard of 2.31' above the high-water surface elevation of 140.74, received from YCWUA. This elevation is at the edge of the existing canal bank. As seen in the drawings provided, the freeboard is 2'-4" (2.33') from edge of the channel to the low girder elevation. A 50-ton crane will be utilized to remove portions of the bridge with all materials to be transported to an approved landfill. The original bridge pylons will be removed by crane; best management practices will be employed to minimize removal impacts and will not alter the streambed or employ dredging activities. As depicted in Exhibit C below, all construction activities will be contained within the area highlighted by the red boundary. The total construction work area is approximately 2.8 acres. Tree removal and removal of other vegetation along the canal will be necessary for the proposed Project. Existing vegetation will need to be cleared and grubbed prior to grading operations. Temporary construction easements will be needed to facilitate utility relocations and allow construction access. Construction is anticipated to last for a period of one year. All construction activities such as site preparation, grading, utility relocation, and site restoration would be contained within the construction work area.

C. Environmental Setting:

The project is located along Picacho Rd. (S-24) 0.4- miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East (see Exhibit A and Exhibit B). The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. At 130 ft (40 m) above sea level, the project is located 0.4 miles north of the Colorado River. The Cargo Muchacho Mountains are 8.5 miles to the northwest, the Algodones Dunes are 13 miles to the west, and the Laguna and Gila Mountains are 11 miles to the east. The project is in the southeastern portion of the Colorado Desert Province and within the Lower Colorado/Gila River Valleys Ecoregion. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation..

D. Analysis:

The County is the CEQA lead agency having authority to authorize the construction of the project. The County would obtain all necessary permits or licenses from the appropriate federal, state, and/or other local agencies having a permit authority. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation, the Yuma Main Canal, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The land the bridge is located on is designated as Agriculture by the County and Other Land by the California Department of Conservation (DOC). The Bureau of Reclamation (BOR) owns the Yuma Main Canal. Imperial County has an easement and provides transportation for the population over the canal. The Proposed Project would

construct a new improved bridge structure in place of the existing wood bridge where it crosses the Yuma Main Canal. The Proposed Project is consistent with both the Imperial County General Plan's land use designation of the Proposed Project site and the County's Land Use Ordinance. Therefore, the adoption of the CEQA Initial Study for the Proposed Project would be consistent with applicable County and State ordinances and regulations.

E. General Plan Consistency:

In addition to the analysis stated above, the project is found to be consistent, with the adoption of CEQA Initial Study for the proposed Picacho Bridge Replacement Project.

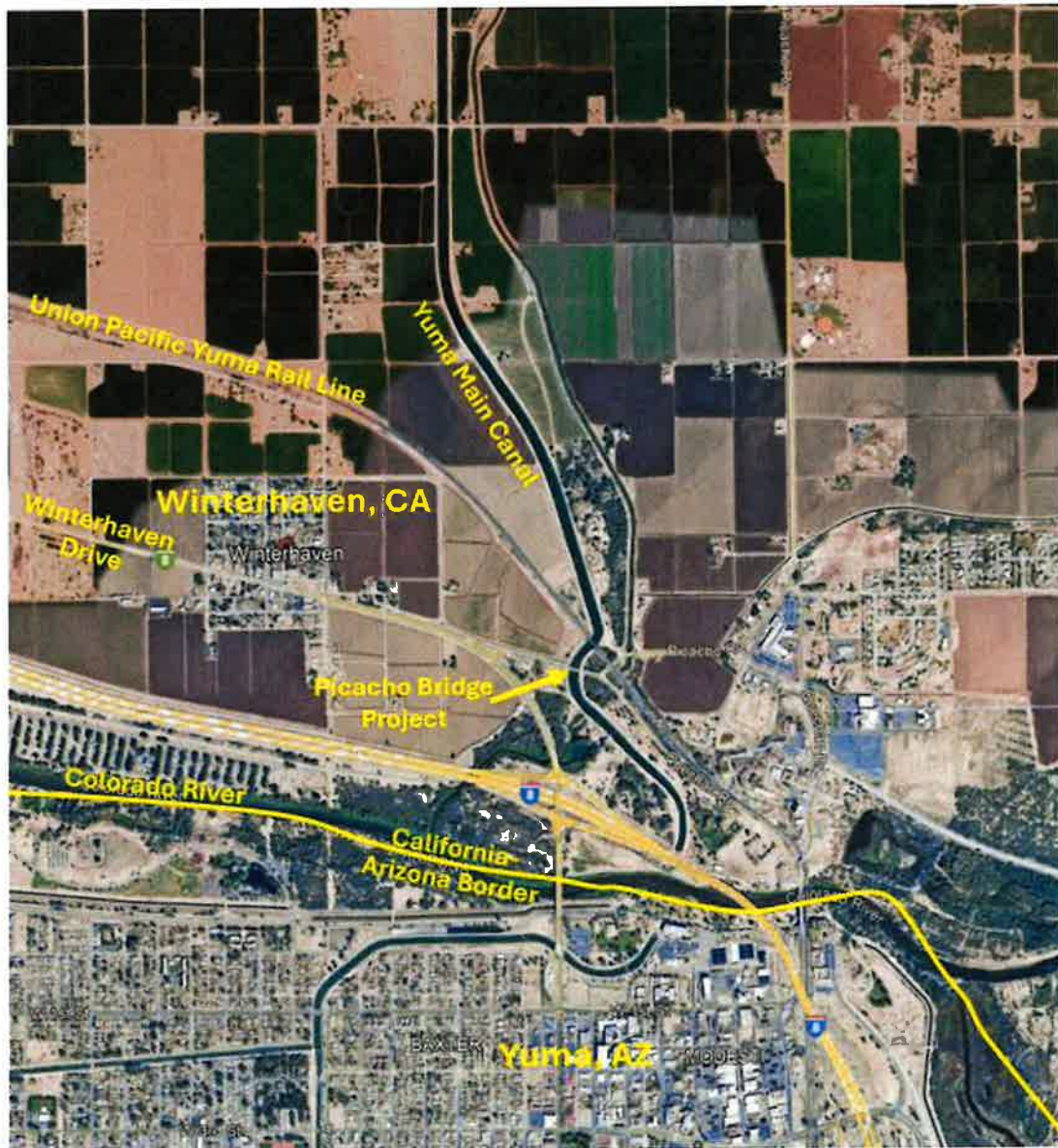


Exhibit A
Project Vicinity

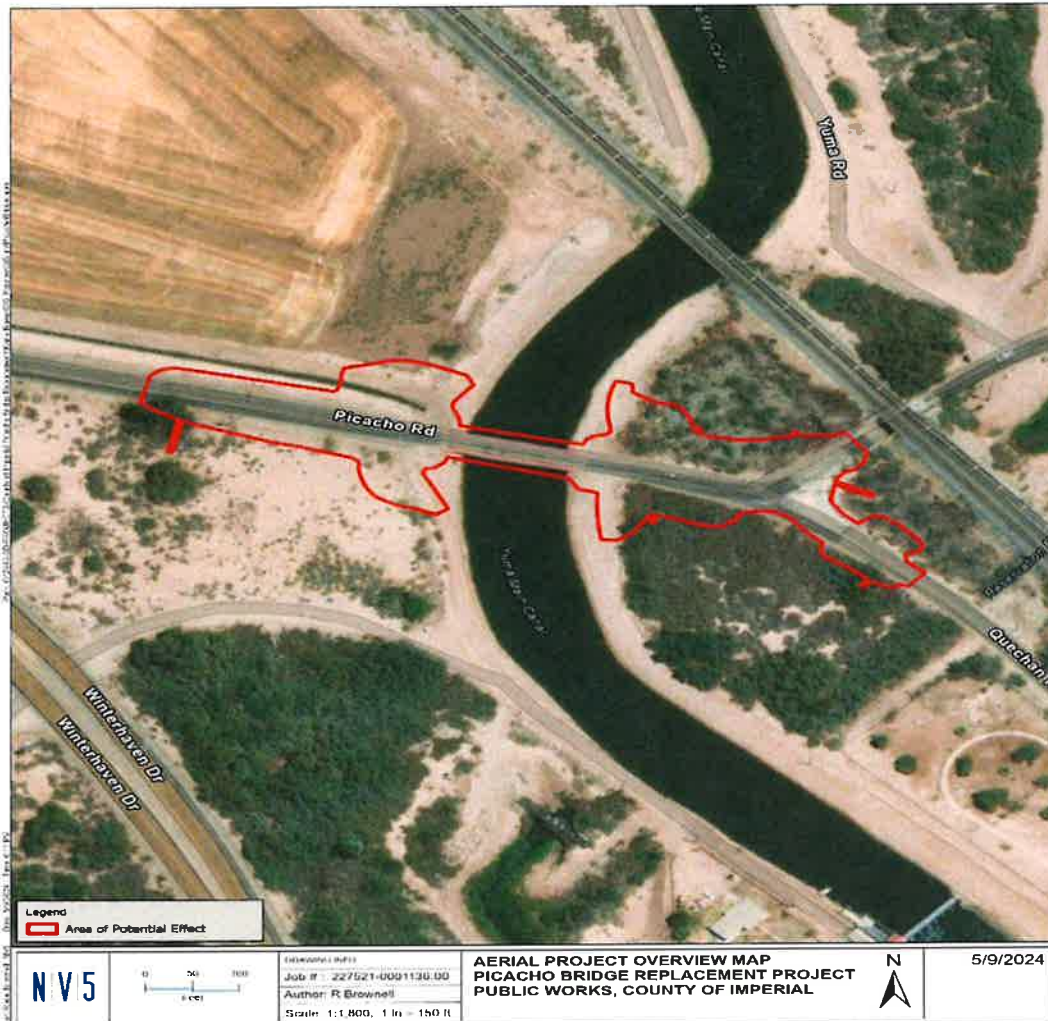


Exhibit B
 Project Location and Footprint

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)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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I. AESTHETICS

The Project Site is in southeastern Imperial County on Fort Yuma Indian Reservation, near the unincorporated Townsite of Winterhaven, which predominantly is an agricultural community. The proposed Project will be located on Picacho Road in County ROW, on the site of an existing deteriorated wood bridge. The proposed Project crosses the Yuma Main Canal and runs parallel to the open-water Seminole Canal. The Yuma Main Canal and Seminole Canal are administered through the Yuma County Water Users' Association (YCWUA) in conjunction with the Bureau of Reclamation (Bureau of Reclamation 2022). The channels are manmade and supply water to irrigate farmland in the County. Views from the bridge are typical of farmland in all directions, including the open channels of water running west and north, the railroad, and Picacho Road to the west. The viewshed is compatible with the zoning of the land surrounding the proposed Project.

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

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

a) Scenic vistas are typically categorized as either panoramic views (visual access to a large geographic area) or focal views (visual access to a particular object, scene, setting, or feature of interest). The proposed Project will replace the existing bridge on Picacho Road. The proposed Project is located in southeastern Imperial County, Fort Yuma Indian Reservation, near the unincorporated Townsite of Winterhaven. The proposed Project Site is mainly utilized for agriculture and is characterized by land designated as Agriculture. The bridge is a transportation route across the Yuma Main Canal that supplies water to irrigate the surrounding farmland.

The proposed Project consists of replacing the existing bridge on Picacho Road. There is a potential during temporary construction for the proposed Project construction to impact the scenic vistas for signage, staging, etc. However, upon completion of temporary construction, in compliance with the General Plan, no permanent impact on scenic vistas from the proposed Project would occur. The new bridge will look similar to the existing bridge in scale and height. A less than significant impact would occur.

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

b) According to Caltrans' California State Scenic Highway System Map, no designated or eligible State Scenic highways are near the proposed Project Site (Caltrans 2018). The closest eligible highway is 80 miles west, on Interstate 8, of the proposed Project, and the closest designated highway is 120 miles northwest, on SR-78, of the proposed Project. Imperial County administers highways through the Caltrans California State Scenic Highway System (Imperial County 2008). The proposed Project would not damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings along a State scenic highway. No impact would occur.

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

c) Agricultural farmlands, water canals, and railroads dominate the existing visual character of the Project Site and surroundings. The Project Site consists of the asphalt bridge on Picacho Road that crosses the Yuma main canal. Staging and storage of construction vehicles will take place within the existing right-of-way of Picacho Road between the bridge and Winterhaven Drive to accommodate the contractor's temporary facilities. The proposed Project proposes a replacement of the bridge on Picacho Road.

The farmland surrounding the proposed Project is considered to be scenic. During construction, views across the Project Site and surrounding areas would be affected by staging, grading, vehicles, and signage. However, the construction impact is planned to take one year and upon completion of the proposed Project, would not have a permanent effect on surrounding lands and the site will return to a similar footprint to the existing infrastructure (updated infrastructure). The effect on nonurbanized areas would be less than significant.

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

d) The proposed Project proposes nighttime construction that would require lighting. This lighting would be shielded to

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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prevent spill-over to areas outside of the project's construction footprint. There is no existing permanent lighting that will need to be replaced on the bridge. No new source of permanent lighting or glare that would adversely affect day or nighttime views in the area for the proposed Project. There will be a temporary source of lighting during nighttime construction, and upon completion will return to a similar footprint. A less than significant impact would occur.

II. AGRICULTURE AND FOREST RESOURCES

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

Would the project:

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

☐ ☒ ☐ ☐

a) The proposed Project would be located within existing roadways and will extend outside of the County's Right-of-Way; acquisition of ROW will be required. It consists of the replacement of an existing bridge with a new and improved bridge structure to be reconstructed in the same alignment as the existing bridge over the Yuma Main Canal. The Project Site is located in a rural area of Imperial County that contains thousands of acres of farmland. The Project Site does not contain agricultural operations, practices, or farmland; however, it is located adjacent to a group of agricultural lands. NV5 reviewed California Department of Conservation's (CDOC) Farmland Mapping and Monitoring Program (FMMP) inventory, reports, maps, and imagery (CDOC 2004 and 2022a).

The California Important Farmland Finder showed that FMMP designated Unique Farmland is located adjacent to the Project Site. Unique Farmland is defined as farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. The Unique Farmland is located immediately north of Picacho Road, west of Yuma Main Canal, and south of the Union Pacific Railroad. The portion of Unique Farmland that is within the Project Site is located north of Picacho Road and immediately west of the Yuma Main Canal access road. Also, during the construction phase, the proposed Project could result in minor temporary indirect impacts to the Unique Farmland located adjacent to the project footprint. This potential indirect impact area would be small and restricted in nature compared to the remaining Unique Farmland in the Project Site. Direct and indirect impacts on Unique Farmland would be considered less than significant because the impacts on the farmland would be temporary, small, isolated, and/or restricted in nature compared to the remaining Unique Farmland in the Project Site.

This farmland is not located within the project footprint and would not be directly impacted by the proposed Project; however, during the construction phase, the project could result in minor temporary indirect impacts to the Prime Farmland located adjacent to the project footprint. The potential indirect impact area would be small and restricted in nature compared to the remaining Prime Farmland in the project area. Impacts would not cause the conversion of those Prime Farmlands to non-agricultural use; therefore, they would be considered less than significant. However, the Imperial County General Plan, Objective 3.6, states that projects occurring adjacent to agricultural land must create an on-site buffer zone and shall favor protection of the maximum amount of farmland. Thus, Mitigation Measure AG-1 will be implemented to ensure that a less-than-significant impact would occur to the surrounding farmland.

MM AG-1: Create an on-site buffer zone surrounding the Project Site to ensure no indirect impacts would occur to surrounding agricultural lands. It is recommended the County will need to obtain a signed statement from adjacent property owners stating that no indirect impacts will occur to their property.

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

☐ ☒ ☐ ☐

b) NV5 reviewed the Imperial County General Plan and the Imperial County Land Use Zoning map application (Imperial County 2022b). The Project Site is within the Fort Yuma Indian Reservation and adjacent to agricultural land, however the proposed

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Project would not conflict with existing zoning for agriculture use or a Williamson Act Contract. The Project Site and surrounding area is zoned as "Native American." The proposed project is located adjacent to Unique Farmland, however, with the implementation of Mitigation Measure AG-1, impacts would be less than significant.

Review of the CDOC's California Williamson Act Enrollment Finder (CDOC 2022b) showed that Imperial County is a "non-participating or withdrawn" entity. Imperial County exited the Williamson Act program by non-renewing all contracts within the County. The Project Site is not located within or adjacent to land that is enrolled in a Williamson Act Contract; therefore, no impacts to lands under a Williamson Act Contract would occur.

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

c) The proposed Project is in land zoned as Native American and is located within the County ROW (Picacho Road). The proposed Project is not in any forest land or area zoned for Timberland production. The proposed Project would maintain the existing zoning and would not conflict with existing zoning for or cause the rezoning of forest land, timberland, or timberland-zoned Timberland Production. No impact would occur.

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

d) As stated in (c), the proposed Project will maintain its existing land use as a bridge for transportation, and no loss of forest land or conversion of forest land to non-forest use will occur within the Project Site. No impact would occur to forest land.

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

e) Please refer to the responses to thresholds (a) through (d) above. The Project Site and adjacent lands do not contain forest lands, therefore, no impacts to forest land would occur. The proposed Project is anticipated to impact Prime Farmland and Unique Farmland; however, with the implementation of Mitigation Measure AG-1, impacts related to conversion of Farmland to non-agricultural use would be less than significant.

III. AIR QUALITY

The Project Site is located in Imperial County which is part of the Salton Sea Air Basin (SSAB). According to ICAPCD, Imperial County extends into the southeastern corner of California and is bordered on the south by Mexico, on the east by Arizona, and north by Riverside County. The climatic conditions in Imperial County are based on the large-scale sinking and warming of air in the semipermanent tropical high-pressure zone of the eastern Pacific Ocean. The coastal mountains prevent intrusion of any cool, damp air found in California coastal areas. Winters are reported to be mild and dry with average daily temperatures ranging from 65°F- 75°F (18-24°C) and sometimes even maximum temperatures of 80°F. Imperial County has hot summers with temperatures ranging between 104°F- 115°F (40-46°C) and sometimes as high as 120°F. Imperial County has a flat terrain and due to its temperature differences created by solar heating, there are moderate winds and deep thermal convection. Due to its distance from the ocean and mountain highlands, Imperial County has limited precipitation. Rainfall from a heavy storm can exceed the entire annual total during a later drought condition. Humidity is also very low throughout the year, with an average of 28% in the summer and 52% in the winter. Wind statistics show that wind patterns are from west-northwest through southwest and a secondary flow maximum from the southwest area. The winds from the west and northwest occur from the fall through spring and come from the Los Angeles area. Half of the observed wind speeds measure less than 6.8 miles per hour (mph). However, during April and May there may be periodic high winds that can exceed 31 miles per hour (mph).

Potentially
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(PSI)

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Mitigation
Incorporated
(LTSMI)

Less Than
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Impact
(LTSI)

No Impact
(NI)

Table 1: Significance Thresholds for Criteria Pollutants

ICAPCD Significance Thresholds for Criteria Pollutants			
<i>Pollutant</i>	<i>ICAPCD Construction Threshold (lbs/day)</i>	<i>ICAPCD Operational Threshold (lbs/day)</i>	<i>General Conformity de minimis Thresholds (tons/year)</i>
<i>PM₁₀</i>	150	<150	N/A
<i>PM_{2.5}</i>	-	-	N/A
<i>ROG</i>	75	<55	100
<i>NOx</i>	100	<55	100
<i>CO</i>	550	<550	N/A

N/A= not applicable since air basin is in attainment or unclassified.

Potentially
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Impact
(PSI)

Less Than
Significant with
Mitigation
Incorporated
(LTSMI)

Less Than
Significant
Impact
(LTSI)

No Impact
(NI)

**Table 2: Air Quality Standards and Designations for Project Area
within the Salton Sea Air Basin**

Ambient Air Quality Standards & Designations					
Pollutants	Average Time	State Standards	State Attainment Status	Federal Standards	Federal Attainment Status
Ozone	1-hr	0.09 ppm	N	None	-
	8-hr	0.070 ppm	N	0.070 ppm*	N**
Particulate Matter (PM10)	24-hr	50 ug/m ³	N	150 ug/m ³	U
	Annual	20 ug/m ³	N	None	-
Fine Particulate Matter (PM2.5)	24-hr	None	-	35 ug/m ³	U/A
	Annual	12 ug/m ³	A	12 ug/m ³	U/A
Carbon Monoxide (CO)	1-hr	20 ppm	A	35 ppm	U/A
	8-hr	9 ppm	A	9 ppm	U/A
Nitrogen Dioxide (NO2)	1-hr	0.18 ppm	A	100 ppm	U/A
	Annual	0.030 ppm	A	0.053 ppm (100 ug/m ³)	U/A
Sulfur Dioxide (SO2)	1-hr	0.25 ppm	A	0.075 ppm (196 ug/m ³)	A
	24-hr	0.04 ppm	A	0.14 ppm	A
	Annual	None	A	0.030 ppm	A
Lead	30-day average	1.5 ug/m ³	A	None	-
	Calendar Quarter	None	-	1.5 ug/m ³	U
	Rolling 3-month average	None	-	0.15 ug/m ³	U
Hydrogen Sulfide	1-hour	0.03ppm	U	None	-
Visibility reducing Particles	8-hour (10:00 to 18:00 PST)	***	U	None	-
Sulfates	24-hour	25 ug/m ³	A	None	-

*U.S. EPA revised the 8-hour ozone standard from 0.075 to 0.070 ppm on October 1, 2015.

**The attainment status is based on the 2008 8-hour ozone standard (0.075 ppm).

U= Unclassified

A=Attainment

N=Nonattainment

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon for the following determinations.

Would the Project:

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

a) The proposed Project is in the Salton Sea Air Basin (SSAB) and currently in non-attainment for the CAAQS for PM₁₀ and Ozone, and for the NAAQS 8-hour ozone. All development within the SSAB, including the proposed Project, is subject to the Modified Air Quality Management Plan, which was adopted in 2010, and the 2018 State Implementation Plan for PM₁₀. The control strategies discussed in these air quality plans are based on regulatory controls aforementioned in the regulatory setting. The purpose of the proposed Project is to replace the existing deteriorating bridge with a new Precast Pre-stressed Concrete Girder Bridge. It would not induce population growth and as such, the proposed Project would not conflict with any applicable air quality plans. The minor amounts of emissions generated during operation from worker trips will not impede attainment of the NAAQS or CAAQS by the ICAPCD. As a result, this impact would be less than significant.

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

b) PM₁₀ and PM_{2.5} emissions during all constructive phases will be minimized because the proposed Project will be required to implement the standard air quality and dust control measures of the ICAPCD Regulation VIII, including Rule 800 (General Requirements for Control of Fine Particulate Matter), Rule 801 (Construction and Earthmoving Activities), Rule 802 (Bulk Materials), Rule 803 (Carry- Out and Track- Out), Rule 804 (Open Areas), and Rule 805 (Paved and Unpaved Roads).

Construction of the Project is anticipated to commence at the beginning of 2024 and is estimated to occur over eight months. Construction phases include land clearing, grading and excavation, drainage, utilities and sub-grade, and paving. NO_x and PM emissions will be generated from offroad construction equipment exhaust, soil disturbance as well as other criteria pollutant emissions from construction worker vehicles, transport vehicles for materials and supplies, removal of construction debris, and other on-road mobile sources. Emissions were estimated using CalEEMod Version 2022.1.1.19. Summaries of emission calculations and project assumptions are provided (Appendix A, Construction Details & CalEEMod Report).

Depending on the construction phase, project construction emissions may vary from day to day but will not exceed ICAPCD construction thresholds as summarized below in Table 3. Thus, project construction emissions will not contribute to an existing or projected air quality violation. As a result, this impact would be less than significant.

Table 3: Project Maximum Daily Construction Emissions (pounds/day)

	VOC	Nox	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions (lb/day)	7.28	63.69	67.01	0.13	85.01	10.96
ICAPCD Significance Thresholds (lb/day)	75	100	550	150	150	55
Threshold Exceeded	No	No	No	No	No	No

Currently, at the proposed site, trucks are being detoured because of the weight restriction on the deteriorating bridge. As a result, there will not be an increase of motor vehicles traffic over the bridge or in the surrounding community. Any operational-related emissions may be generated by occasional worker visits for maintenance and repairs. These operational emissions will not exceed ICAPCD thresholds described in Table 1. Thus, project operations will not contribute to an existing or projected air quality violation. As a result, this impact would be less than significant.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

c) The nearest sensitive receptors are approximately 0.5 miles away from the Project Site. Sensitive receptors located along the project corridors include a Clinic and Quechan Tribal territory. During construction, diesel equipment may contribute to diesel particulate matter (DMP), which is a toxic air contaminant in California. However, according to the California Office of Environmental Health Hazard Assessment and their adoption of Air Toxics Hot Spots Program Guidance Manual used for risk assessments, the risks associated with exposure to substances with carcinogenic effects are based on a dose-response assessment of a lifetime of chronic exposure. This is characterized as 24 hours a day, 7 days per week, 365 days per year for a 70-year exposure. Nevertheless, equipment used in construction would emit temporary diesel exhaust concentrations are not considered substantial emissions and would be less than significant and minor. Similarly, traffic volumes would not increase and long-term operational impacts on sensitive receptors would be less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)	☐	☐	☒	☐
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d) The proposed Project would not create objectionable odors affecting a substantial number of people. Project construction would result in the emission of diesel fumes and other odors typically associated with construction activities. Odors are highest near the source and would quickly dissipate off the site. Any odors associated with construction activities would be transient and would cease upon completion. The proposed Project is located in an area designated for agricultural use with minimal residences in the vicinity. Therefore, Project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

This site is located within the Colorado Desert which is a subdivision of the larger Sonoran Desert and covers approximately 7 million acres. The desert encompasses Imperial County and includes parts of San Diego County, Riverside County, and a small part of San Bernardino County. This site is in Imperial County. This desert lies at a relatively low elevation, below 1,000 feet, with the lowest point of the desert floor is 275 feet below sea level at the Salton Sea; northeast of the site. The highest peaks of the Peninsular Ranges which reach elevations of nearly 10,000 feet are to the west of the site. The Colorado Desert's climate differs from other deserts. The region experiences greater summer daytime temperatures (up to 120°F) than higher elevation deserts and rarely experiences frost. In addition, the Colorado Desert experiences two rainy seasons per year usually in the winter and late summer in this portion. This area is within the agricultural portion that is irrigated by Colorado River water delivered through water conveyance structures maintained by the Bureau of Reclamation, Bard Water District and Yuma County Water Users. This Picacho Road Bridge spans the Yuma Main Canal which carries irrigation water to local farmers.

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?	☐	☒	☐	☐
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a) The proposed Project does not impact or modify habitat that would have a substantial adverse effect of 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. The top of the bridge is asphalt, heavily travelled and is not biologically sensitive. In regard to special-status plant species, a search of the Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle, listed 10 botanical species within the Quadrangle searched. None would be expected to be found within the Project Site. In regard to special-status animal species, a search of Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle listed 37 zoological species within the Quadrangles searched. Of these, two species: Gila woodpecker (*Melanerpes uropygialis*) and Burrowing owl (*Athene cunicularia*) were noted. Burrowing owls could be expected outside the proposed Project setting but were not observed during survey (See Biological Resources Survey, Appendix B). Gila woodpeckers could be found roosting or nesting in palm trees present off site. Therefore, it is expected that less than significant impact would occur with mitigation measures Biol-1 and Biol-2 added.

MM BIO-1: Nesting surveys by qualified biologists during nesting season (February through August); preferably time construction during non-nesting season (September through January). Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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MM BIO-2: Worker environmental awareness training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW):

- **Biology and status;**
- **Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas;**
- **Reporting procedures to be used if a species is encountered in the field; and driving procedures and techniques, for commuting, and driving on, to the Project Site; and**
- **Identification of nesting birds and procedures to follow if nesting is suspected.**

- 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? ☐ ☐ ☒ ☐

b) The proposed Project does not have the potential to have significant impact on any riparian, or other sensitive natural community as identified in local or regional plans, policies or regulations. The proposed Project activities take place over and near the Yuma Main Canal. BMPs are set forth to ensure no work will occur in or come in contact with the water in the Yuma Main Canal. Areas outside of the project footprint will be designated as an "Environmentally Sensitive Area" (ESA) on project plans. No project-related activities will take place within the ESA-designated areas. It is expected less than significant impacts would occur from the proposed Project.

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

c) The proposed Project does not have the potential to have adverse effects on any wetlands. There is no proposed removal, filling, hydrological or any other activities in the proposed Project's description that would have an impact on any state or federal wetlands. BMPs are set forth to ensure no work will occur in or come in contact with the water in the Yuma Main Canal. Therefore, less than significant impact would occur.

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

d) The proposed Project includes the removal and construction of a bridge that spans over the Yuma main Canal on Picacho Road. No work is expected to occur in the water or impact the water in any way. Therefore, no fish species are expected to be impacted by the proposed Project. Additionally, the habitat is divided by Picacho Road (S24) which runs from I-8 to Bard, CA. Picacho Road can be accessed by wildlife. There are no known wildlife corridors or native wildlife nursery sites with the proposed Project, therefore, construction activities would not impede the use of native wildlife nursery sites with implementation of Mitigation Measure BIO-1, impacts would be less than significant impact with mitigation.

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

e) The proposed Project does not fall within an area that the County has designated having development restrictions or prohibitions to facilitate conservation of biological resources or other sensitive resources. Such Critical Habitat is designated to ensure the protection of the Desert pupfish, Razorback sucker, Desert tortoise, Peirson's milk-vetch, Peninsular bighorn sheep and Yellow-billed cuckoo. None of these species were observed within the Project Site during the biological survey performed (Attachment B). No additional species of concern listed as rare under the Conservation and Open Space Element Imperial County are expected to be impacted by the proposed Project. California Species of Special Concern are of particular conservation focus on Imperial County including the burrowing owl are expected to have less than significant impact with implementation of Mitigation Measure BIO-2. Less than significant impact with mitigation to biological resources are expected.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

f) There are no proposed permanent or temporary impacts to the Yuma Main Canal as a result of the proposed Project. The proposed Project occurs outside of any area designated and an "Environmentally Sensitive Area" (ESA) on project plans. The proposed Project does not conflict with any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State HCP. The proposed Project does not conflict with the California Endangered Species Act (CESA). Less than significant impact is expected to occur.

V. CULTURAL RESOURCES

Would the project:

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

a) Picacho Road Bridge over Yuma Main Canal was constructed in 1925 and rehabilitated in 1947 and is a California Historic Bridge (California Historic Bridge Inventory). The existing bridge was put in place in 1947 and meets the age criteria to be considered as an above ground historic resource. However, previous evaluation has recommended this structure as not eligible for the National Register of Historic Places with the implementation of mitigation measures CUL-1 as recommended in the Cultural Report (See Cultural Report, Appendix C). The proposed Project will not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 with mitigation in place. There would be less than significant impact with mitigation.

MM CUL-1: In all phases of construction work an Inadvertent Discovery Plan should be developed and shared with staff on-site. If archaeological or cultural resources are encountered during project work, all work in the immediate vicinity of the find will be suspended until assessed by the qualified archaeologist and a treatment is determined.

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

b) The proposed Project will not likely cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The proposed Project area likely saw significant levels of precontact and historic activity due to its position in and adjacent to a road and bisected by a large canal. The entire Project Site has undergone significant ground disturbing activities related to construction activities (excavation, fill placement, dredging, etc.). For these reasons, the potential for the discovery of intact cultural resources is anticipated to be low. However, there is always a possibility of archaeological discovery, and it was anticipated that if found, cultural resources would most likely be pre-contact artifact scatters or isolates related to resource acquisition areas, historic artifacts related to canal construction and/or general household refuse related to historic-period dumps near the roadway. Therefore, with the implementation of mitigation measure CUL-1 there would be less than significant impact with mitigation.

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

c) There are no noted findings of human remains, including those interred outside of formal cemeteries. Additionally, no formal cemeteries occur within the proposed Project footprint. Should any human remains be found during construction, mitigation measure CUL-2 as recommended in the Cultural Report (See Appendix C) would be implemented. Therefore, impacts to human remains would be less than significant with mitigation.

MM CUL-2: Should human remains be encountered during ground disturbing activities; all work will cease, and the County Medical Examiner will be contacted.

VI. ENERGY

Energy for the Project Site is supplied by Imperial Irrigation District (IID). IID serves approximately 158,000 customers in an approximately 6,417-square-mile service area. IID controls more than 1,100 megawatts of energy from various resources.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	☐	☐	☒	☐
a) Construction of the proposed Project would require the use of energy in the form of gasoline and diesel for equipment and transportation of materials. However, the use of fuel for construction would not be on such a large scale that it would be wasteful or affect local or regional energy supplies. Energy used for short-term construction activities would improve infrastructure and reliability as a transportation route. As such, construction impacts would be less than significant due to their temporary nature. The electricity use would be relatively minimal compared to the overall electricity usage in the YCWUA service area and would not be considered wasteful, as the proposed Project would support compliance with them. Operation impacts would be less than significant.				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒
b) No state or local plans for renewable energy or energy efficiency are applicable to the proposed Project. The proposed Project proposes the replacement of the existing bridge on Picacho Road. As discussed above, the proposed Project will consume energy during construction, but upon completion of the construction, it will return to a similar footprint (transportation infrastructure). There will be no energy consumption after construction or components that require renewable energy or energy efficiency, therefore no impact will occur.				

VII. GEOLOGY AND SOILS

The proposed Project is located near the Townsite of Winterhaven in Imperial County. Imperial Valley is a broad, flat, alluvial area located between Southern California and the Colorado River. The regionally extensive faults trend that controls the topography is the San Andreas Fault. The San Andreas Fault is located approximately 80 miles northwest from the Project Site. The proposed Project area falls within the USGS Yuma West and East 7.5-minute quadrangles. In the vicinity of the proposed Project, the subsurface is composed of Quaternary-age alluvium/colluvium that is characterized as loosely consolidated deposits consisting of sand, silt, and clay. The proposed Project is located on Holtville Clay, Indio silt loam (0 to 1 percent slopes), Lagunita loamy sand, and Ripley silt loam.

Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including 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? | ☐ | ☒ | ☐ | ☐ |

1) The proposed Project is located on the bridge on Picacho Road near the Townsite of Winterhaven. Despite the fact that the Project Site is within an active seismic area in southern California, the proposed Project Site has not been evaluated by the California Earthquake Hazards Zone Application for Alquist Priolo Fault Zones, Landslide Zones, or Liquefaction. It is unknown if the proposed Project is underlain by active, potentially active, or inactive faults, nor is the area within an Alquist-Priolo Earthquake Fault Zone. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.

MM GEO-1: Prior to earthmoving activities, a certified geotechnical engineer or equivalent, shall perform a final geotechnical evaluation of the soils. The evaluation will follow the requirements of California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2. related to expansive soils and soil conditions. The structural design, tests, inspections, soils and foundation standards will be in accordance with requirements from California Building Code Title 24, Part 2, Chapter 16, 17, and 18. The final geotechnical evaluation shall include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures, including threats from liquefaction, subsidence, lateral spreading, or collapse. The grading and improvement plan for each phase of the project shall be designed in accordance with the recommendations provided in the final geotechnical evaluation.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
2) Strong Seismic ground shaking?	☐	☒	☐	☐
2) Despite the fact that the Project Site is within an active seismic area in southern California, the proposed Project Site has not been evaluated by the California Earthquake Hazards Zone Application for Alquist Priolo Fault Zones, Landslide Zones, or Liquefaction. It is unknown if the proposed Project is underlain by active, potentially active, or inactive faults, nor is the area within an Alquist-Priolo Earthquake Fault Zone. Given the regional faults of the proposed Project area, it could be subjected to potential seismic hazards including rupture, ground shaking, and ground failure. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.				
3) Seismic-related ground failure, including liquefaction and seiche/tsunami?	☐	☒	☐	☐
3) Seismically induced liquefaction of soils is a potential geologic hazard, given the proximity of the major fault zone. Liquefaction involves the sudden loss in strength of saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loadings, such as produced by an earthquake. Liquefaction can cause vertical and lateral ground displacements, slope instability, lateral spreading, and bearing failure. During strong ground shaking, soil grains may become more tightly packed due to the collapse of voids or pore spaces. This type of failure typically occurs in loose, granular, cohesionless soil and can occur in either wet or dry conditions. There could be potential for liquefaction at the surface, but it would require extreme wet or flood events. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.				
4) Landslides?	☐	☒	☐	☐
4) Given the flat topography (average slope of 4.3%) of the proposed Project area, there is no indication that landslides would affect the proposed Project. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) The majority of soil disturbance would occur in previously disturbed areas, and ground disturbance would be limited. Disturbed soils would be exposed to erosion during construction as soils loosen and become susceptible to the effects of wind and precipitation events. However, the proposed Project is not expected to result in substantial soil erosion due to the current conditions of the Project Site and through the implementation of standard erosion control BMPs. Construction activities would result in temporary soil disturbance throughout the proposed Project Site due to excavation, but the Project Site will be restored to the current elevation and similar existing conditions upon completion. No erosion is anticipated to occur during normal operations and maintenance of the proposed Project. Because of these reasons, the construction and operation of the proposed Project would have a less than significant impact resulting from erosion or topsoil loss.				
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
c) As discussed above in (a), it is unknown if the proposed Project is located on soil or subsurface geology that could result in hazards. The proposed Project includes the enhancements and construction to the existing bridge and associated infrastructure, which includes an essential service. To evaluate subsurface foundation conditions the Project Site Mitigation Measure GEO-1 will be implemented, and any hazards corrected. With Mitigation Measure GEO-1, a less than significant would occur.				
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?	☐	☒	☐	☐
d) The Project Site has not been evaluated for expansive soils as defined in Table 18-1 B of the Uniform Building Code (1994).				

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
To determine and evaluate what lies beneath subsurface foundation conditions the Project Site Mitigation Measure GEO-1 will be implemented, and any hazards corrected. With Mitigation Measures GEO-1, a less than-significant impact will occur.				
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?	☐	☐	☐	☒
e) The proposed Project's bridge replacement would not include the construction of septic tanks or wastewater disposal systems. Portable toilets will be provided to workers on the Project during the construction phase. Therefore, the proposed Project would have no impact with regard to wastewater disposal systems.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
f) The proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Based on a review of a published geologic map (USGS Yuma West and East 7.5-minute quadrangles), the bridge is surrounded by Alluvial rock mapped as Older Alluvium (Qc) and Alluvium (Ql). This unit is not known to have paleontological resources. Therefore, less than significant impacts would occur.				

VIII. GREENHOUSE GAS EMISSION

Emissions of Greenhouse Gases (GHGs) contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. Greenhouse gases include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), sulfur hexafluoride (SF₆), ozone, and water vapor. For the purposes of this analysis, emissions of carbon dioxide, methane and nitrous oxide were evaluated because these gases are the primary contributors to global climate change for developmental projects such as the proposed site.

The total California GHG emissions in 2020 were approximately 369.2 million metric tons (MMT) of carbon dioxide equivalents (CO₂e). The transportation sector remains the largest source of GHG emissions in the state of California at approximately 37% of the total emissions. Specifically, the largest groups that account for the highest GHG emissions in the transportation sector are passenger vehicles accounting for approximately 26% and heavy-duty vehicles accounting for about 9%. In addition, the industrial sector accounts for approximately 20%.

Would the project:

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

a) Emissions were estimated using CalEEMod Version 2022.1.1.19. Summaries of emission calculations and project assumptions are provided in Attachment A. While construction equipment would emit minor amounts of CH₄ and N₂O, the predominant GHG emissions during construction would be from CO₂. The majority of these CO₂ emissions would be from construction equipment being used at the proposed site. Table 4 shows the unmitigated estimated GHG emissions from construction activity from the proposed site.

Table 4: Construction GHG Emissions

Construction Phase	GHG Emissions 2023 (tonnes/Metric Tons) Per Phase				
	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
Total Construction	661.63	0.03	0.006	0.06	664.27
Amortized Construction Emissions					22.13
SCAQMD Interim Threshold					3,000
Exceedance?					No

The persistence of GHG in the atmosphere defines the impact of the proposed site as long-term. The GHG emissions from construction are amortized over the next 30 years and added to operational emissions in order to estimate annual emissions. However, it is not anticipated that there will be a significant increase in vehicle miles traveled (VMT) because the project is

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not adding capacity (e.g., additional lanes) to Picacho Road or creating a more direct route between two destinations. Thus, there will be a negligible increase in operational GHG emissions. The annual construction emissions are predicted to be approximately 22 tonnes per year including all operational emissions. As discussed in the <i>Regulatory Setting</i> of this analysis, SCAQMD states that proposed sites that generate GHG emissions below 3,000 tonnes CO ₂ e, it can be concluded that GHG emissions are not "cumulatively considerable". Based on the above, the proposed Project would not be considered to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the proposed Project's impacts related to GHG emissions would be less than significant.				

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

b) Neither the ICAPCD nor the County of Imperial has adopted a climate change action plan, as such the only applicable plan for reducing GHGs is the California Air Resources Board's (CARB)'s 2017 *Climate Change Scoping Plan* which indicates strategies for California's 2030 greenhouse gas target of reducing GHG emissions by 40% below 1990 levels by 2030. Table 5 shows the feasible mitigation measures for individual projects provided in the CARB's 2017 Scoping Plan.

Table 5: Consistency with CARB's 2017 Scoping Plan Measures for Individual Projects

Measures from Scoping Plan	Project Consistency
Enforce idling time restrictions for construction vehicles.	Consistent. All utilized off-road equipment will be registered with CARB and meet idling requirements.
Require construction vehicles to operate with the highest tier engines commercially available.	Consistent. The project will require all off-road equipment greater than 50 horsepower to utilize Tier 4 equipment when commercially available.
Divert and recycle construction and demolition waste and use locally sourced building materials with a high recycled material content to the greatest extent feasible.	Consistent. The project will adhere to Title 24 Part 11 requirements that require diversion of a minimum of 65% of construction waste from landfills.
Minimize tree removal and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance.	Consistent. Implementation of the project would result in landscaping that adds more vegetation to the project site where possible.
Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators.	Consistent. Where possible electrical service will be utilized.
Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available.	Consistent. Alternative-fueled construction equipment will be used where possible.
Require diesel equipment fleets to be lower emitting than any current emissions standard.	Consistent. Alternative-fueled/lower emitting construction equipment will be used where possible.

Where feasible, the project would implement the CARB 2017 Scoping Plan Measures described above throughout the project's construction process to reduce GHG emissions. Additionally, where feasible, the project would implement ICAPCD measures described below for reducing criteria pollutant emissions from construction emissions which would also reduce GHG emissions:

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

The above measures would be implemented as part of the construction permitting process for the proposed Project. Therefore, the proposed Project would not conflict with any applicable plan that reduces GHG emissions. Impacts would be less than significant.

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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IX. HAZARDS AND HAZARDOUS MATERIALS

Hazardous substances are defined by federal and State regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261, which provides the following definition: A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed. This section considers the potential for human health hazards or exposure of people to existing sources of potential health hazards from the proposed Project.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered a hazardous waste if it exceeded specific California Code of Regulations (CCR) Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soil or groundwater at a contaminated site do not have the characteristics required to be defined as hazardous wastes, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking the lead jurisdiction. The proposed Project does not expect to generate any reportable quantities of hazardous materials. According to the DTSC ENVIROSTOR Mapping Tool, there are no active hazardous waste clean-up sites within 1,000 feet of the proposed Project.

Would the project:

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

a) Construction would involve the use of heavy equipment, which utilizes fuels and lubricants; however, the quantities involved would not create a significant hazard to the public or the environment and are considered temporary. During the construction, the old bridge would be disposed of to a local municipal waste facility. Municipal waste facilities or construction debris facilities cannot accept hazardous waste. It is unknown if the materials from the old bridge pose a hazard; therefore, the County would prepare and implement Mitigation Measure HAZ-1 which includes the County or construction contractor submitting a test and disposal plan for all wastes generated during demolition to the local municipal waste facility or debris facility. If the waste is deemed hazardous, it will be transported to a hazardous waste facility with a hazardous waste manifest. With Mitigation Measure HAZ-1, impacts from construction would be mitigated to less than significant levels.

MM HAZ-1: All construction contractors shall immediately stop all surface or subsurface activities in the event that potentially hazardous materials are encountered, such as an odor is identified, or considerably stained soil is visible. Contractors shall follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. These requirements shall be included in the contractor's specifications. If any hazardous materials, waste sites, or vapor intrusion risks are identified prior to or during construction, a qualified professional, in consultation with appropriate regulatory agencies, will develop and implement a plan to remediate the contamination and properly dispose of the contaminated material. If material imports are proposed, the contractor shall furnish the County of Imperial or its representative with appropriate documentation certifying that the imported materials are free of contamination.

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

b) The proposed Project would require the use of heavy equipment, such that a potential exists for the release of fuels and/or lubricants during construction and operation; however, the County or its contractor would have an approved Spill Prevention Countermeasure and Control (SPCC) Plan, which is a standard BMP as a special provision in the construction contract(s), to address any release that may occur. The SPCC Plan and BMPs would be included as part of the construction Stormwater Pollution and Prevention Plan (SWPPP) required for construction. Furthermore, in compliance with applicable laws and regulations, the County would prepare and implement Mitigation Measure HAZ-2 which includes a BMP Maintenance Plan with maintenance practices such as the periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to subsoils and groundwater.

MM HAZ-2: Imperial County shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
constituents to subsoils and groundwater. A BMP Maintenance Plan shall be prepared by Imperial County upon approval of the BMP projects that identify the frequency and procedures for removal and/or replacement of accumulated debris, surface soils, and/or media (to a depth where constituent concentrations do not represent a hazardous condition and/or have the potential to migrate further and impact groundwater) to avoid the accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsoils and groundwater. Structural BMPs shall be designed to prevent the migration of constituents that may impact groundwater.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
c) No schools are located within one-quarter mile of the proposed Project. The nearest school is Yuma High school, located approximately 1.2 miles south of the proposed Project. No impacts would occur.				
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
d) The proposed Project is not a listed hazardous materials site pursuant to Government Code §65962.5 (Cortese List), and none of the proposed improvements would cause the Project Site to be listed as a hazardous materials site. Additionally, no sites were located within 1,000 feet of the proposed Project location.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
e) No public airports are located within the vicinity of the proposed Project. The closest public airport is located approximately 5 miles from the proposed Project (Yuma International Airport). The proposed Project is not in an airport land use plan or within two miles of a public airport or public use airport. No impact would occur.				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
f) The proposed Project would not cause any changes that would impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Construction activities will primarily take place near the existing bridge. A detour route is currently used to avoid driving on the bridge due to its poor condition. Construction activities in the public right-of-way are considered temporary and will require a construction traffic control plan to minimize access disruptions. With the implementation of a traffic control plan, construction impacts would be less than significant. After the project is completed, the site will be returned to existing conditions and would not have an impact relative to emergency response plans or emergency evacuation plans.				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
g) The CALFIRE Fire Hazard Severity Zone (FHSZ) Maps identify areas with high and very high fire hazard severity categories. The proposed Project is located within an Urban Unzoned area (COSFM 2022). Although the construction equipment has the potential to ignite dry vegetation, the proposed Project would comply with federal and State regulations for construction fire safety, such as California Department of Transportation and California Vehicle Code requirements for spark arrestors on vehicles to minimize the risk of fire during construction. Impacts would be less than significant.				

X. HYDROLOGY AND WATER QUALITY

The setting for the proposed Project is Picacho Bridge located near the Townsite of Winterhaven, CA. The Picacho Bridge spans the Yuma Main Canal which is owned by the BOR, and its waters are managed by their partners the YCWUA. The proposed Project will implement a Stormwater Pollution Prevention Plan (SWPPP) during demolition and construction to minimize impacts related to storm

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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water quality and runoff. The County will ensure that no debris, including trash, siltation, or fill material, from construction activities enters the Yuma Main Canal which the bridge spans. The proposed Project is considered a Regulated project under the State's Phase II MS4 Permit, Order No. 2013-0001-DWQ, and is required to prepare a Storm Water Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will be prepared by a Registered Civil Engineer and will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition.

Would the project:

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

a) The proposed Project will implement a Stormwater Pollution Prevention Plan (SWPPP) during demolition and construction to minimize impacts related to storm water quality and runoff. The County will ensure that no debris, including trash, siltation, or fill material, from construction activities enters the Yuma Main Canal which the bridge spans. The proposed Project is required to prepare a Storm Water Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition. The project also does not require any ground water or inject any construction water into the ground. Therefore, impacts to surface or ground water quality would be less than significant.

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

b) The proposed Project would not use groundwater supplies or interfere substantially with groundwater recharge. Therefore, the proposed Project would have no impacts related to groundwater supplies or groundwater recharge.

- 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: ☐ ☐ ☒ ☐

The proposed Project would be limited to Picacho Road Bridge and the surrounding ROW and would not significantly alter the current drainage patterns or significantly change the existing impervious area within the Project Site. Therefore, the proposed Project would have less than significant impacts related to existing drainage patterns, alteration of stream courses, or increases in impervious surfaces.

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

During project construction, erosion could occur as a result of grading, excavation, or other construction activities. Erosion would be minimized through the implementation of a Stormwater Pollution Prevention Plan (SWPPP) as required by the SWRCB's Construction General Permit with standard and project-specific stormwater BMPs such as limiting the amount of disturbed soil, preventing runoff from leaving the project site, minimizing track-out from the project site, and implementing erosion control and stormwater detention measures in advance of rainfall events. Additionally, no earthwork or other soil disturbance activities would occur in nearby waterways. The proposed Project is also required to prepare a Storm Water Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the proposed Project would have less than significant impacts related to erosion or siltation on- or offsite.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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| (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. The proposed Project would not substantially increase the amount of paved surfaces or the rate or amount of surface runoff that would result in flooding on- or offsite. The proposed Project would also implement a SWQMP and incorporate permanent site control and treatment control BMPs to control, dissipate, and treat stormwater runoff. Therefore, the proposed Project would have less than significant impacts related to the rate or amount of surface runoff.

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

The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. No significant increase in runoff water is expected to result from the proposed Project. The proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. The proposed Project would also implement a SWQMP and incorporate permanent site control and treatment control BMPs to control, dissipate, and treat stormwater runoff. Therefore, the proposed Project would have less than significant impacts related to runoff water, including polluted runoff.

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

The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. The Project Site is not within an area mapped as a Federal Emergency Management Agency (FEMA) Flood Hazard Zone. Therefore, the proposed Project would have less than significant impacts related to impeding or redirecting flood flows.

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

d) The Project Site is not within an area mapped as a FEMA Flood Hazard Zone. The Project Site is also not located in an area subject to potential inundation by seiches, tsunami, or mudflow. Although construction of the proposed Project will involve the use of fuels, paints, and other potential pollutants typically used in the construction process, the Project does not involve the permanent storage of any pollutants that could be released in a flood inundation event. Therefore, the project would have no impacts related to flood hazard, tsunami, or seiche zones or the release of pollutants due to project inundation.

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

e) The proposed Project would not result in conflicts or impacts to implementation of a water quality control plan or sustainable groundwater management plan. . The proposed Project is considered a Regulated project under the State's Phase II MS4 Permit, Order No. 2013-0001-DWQ and is required to prepare a SWQMP and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will be prepared by a Registered Civil Engineer and will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition. Impacts would be less than significant.

XI. LAND USE AND PLANNING

The proposed Project proposes the replacement of the existing bridge. After completing the bridge replacement, bridge and surface improvements would provide safer transportation infrastructure from Winterhaven (to the west) to the Fort Yuma Indian Reservation (to the east). The current land use and zoning will remain.

Surrounding the Project area are farms designated as agricultural lands in the County's General Plan, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The land the bridge is located on is zoned as agricultural by the county and Other Land by the DOC. The BOR owns this parcel. Imperial County has an easement and provides

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transportation for the population over the water canal. The bridge is also under the jurisdiction of the YCWUA, Bard Water District, IID, Imperial County and BIA.				

Would the project:

- a) Physically divide an established community? ☐ ☐ ☐ ☒
- a) The proposed Project is proposing the replacement and enhancement of the bridge on Picacho Road (County ROW) that crosses the Yuma Main Canal into the unincorporated Townsite of Winterhaven. The Project Site land is zoned as agriculture by the County and Other Land by the DOC. Surrounding the Project Site is land designated as Agriculture in the County's General Plan and Prime and Unique Farmland by the DOC. The bridge allows access from Winterhaven (west) to the Fort Yuma Indian Reservation (Quechan Drive-east).
- The proposed Project provides transportation for the population from the west to the east. The Quechan people heavily utilize Picacho Road and the Quechan Tribe Comprehensive Plan (QTCP) anticipates the future replacement of the bridge. Therefore, the proposed Project is consistent with the QTCP. Project construction would include the closure of the bridge. During construction, Picacho Road between Winterhaven Drive and Quechan Road will be closed to traffic and a detour route will be made available. Detour travel times and lengths will be minimal during construction.
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☐ ☒
- b) The proposed Project is in compliance with the land use plan, policy, and regulations of the overseeing agencies. The Picacho bridge and Yuma Main Canal are owned by the BOR. The BOR has a contract which grants various agencies shared jurisdiction over the bridge. This contract gives jurisdiction to the YCWUA, Bard Water District, IID, Imperial County and BIA. None of these agencies have land use plans, policies, or regulations which conflict with the proposed Project. Therefore, no impact is suspected from the proposed Project.

XII. MINERAL RESOURCES

The State of California classifies mineral resource areas into Mineral Resources Zones (MRZ). The four-zone classifications (MRZs 1-4) indicate whether mineral resources (primarily sand and gravel) are known to be present or absent, or whether additional information is necessary. The County does not have any maps available to display the MRZs in the County. The CGS's Aggregate Sustainability in California Map does not display any present or future aggregate resources in the Project Site (CGS 2018). Therefore, no MRZs are located in the Project Site.

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? ☐ ☐ ☐ ☒
- a) The proposed Project is located on Picacho Bridge which is located in the unincorporated area of Winterhaven in Imperial County. The Project Site is designated as Agriculture in the County's General Plan and Other Land by the DOC (see Section 3.1.2). The surrounding area of the bridge is zoned as agricultural land by the County and Prime and Unique Farmland by the DOC (see section 3.1.2). The proposed Project proposes the replacement of the existing bridge on Picacho Road.
- Imperial County does not have any readily available maps displaying mineral resource zones in the County. However, the CGS's Aggregate Sustainability in California Map does not display any aggregate production areas, permitted reserves, or future aggregate production areas in the Project Site. Therefore, the proposed Project would not 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, and no impacts would occur.
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐ ☒
- b) As discussed above, the proposed Project site is located on the Picacho Bridge which is located in the unincorporated area of Winterhaven in Imperial County. There are no locally important mineral resource recovery sites identified by the County or CGS. The land use for the site will remain as is with the proposed improvements and replacement of the transportation bridge. The proposed Project would not result in the loss of availability of a locally important mineral resource

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
recovery site delineated on a local general plan, specific plan, or other land use plan and no impacts would occur.			

XIII. NOISE

The proposed Project is located in a rural agricultural area with scattered residences. Concentrated residential areas are present in Winterhaven, which is located to the northwest of the Project Site. Sensitive receptors in the Project Site would include Fort Yuma Health Care Clinic 0.4 miles east of the site, Abundant Life Church located 0.5 miles west of the site, rural residences and the residential areas in Winterhaven. Rural residences in the Project Site are no closer than 485 feet to the project boundary. The nearest concentrated neighborhood is 1900 feet from the project boundary.

Existing noise sources in the Project Site include agricultural equipment, vehicular traffic including highway traffic on I-8, and trains on the Union Pacific Railroad (UPRR). I-8 Kumeyaay Hwy runs east and west 0.3 miles south of the Project Site. The UPRR railroad tracks run northwest to southeast in general proximity to Picacho Road and Quechan Road east of the project Site. Typical sound levels for the existing noise sources found in the project area, normalized to a reference distance of 50 feet, are shown in Table 6 below.

Table 6: Existing Noise Sources in Project Site

Noise Source	Sound Level at 50 ft
Agricultural equipment	67-82 dBA (Fretzer, et al. 2022)
Light vehicular traffic	56 dBA (Imperial County 2015)
Highway traffic	70-80 dBA (USDOT FHWA 2003)
Train (horn at road crossings)	116 dBA maximum (USDOT 2009)
Train (locomotive and cars)	83-91dBA (USDOT 2009)

Would the project result in:

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

a) During the long-term operational phase, development of the proposed Project would not result in an increase in noise levels above the existing conditions in the Project Site.

During the proposed Project's short-term construction phase, operation of construction equipment would generate noise. Table 7 shows the typical average maximum noise level of the pieces of equipment expected to be used during project construction at a distance of 50 feet. Noise levels from equipment shown here increase or decrease with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

Table 7: Construction Equipment Noise Levels

Equipment	Maximum Noise Level (dBA) at 50 feet
Bulldozer	82
Boring machine	83
Backhoe	78
Concrete mixer truck	79
Excavator	81
Mud sucker	81
Skid steer loader	79
Jackhammer	89
Medium-duty truck (5 ton)	76
Air compressor	78
Pickup Truck	75

Source: 2011 FHWA Construction Noise Handbook, Table 9.1, actual measured sound levels, samples averaged

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The nearest sensitive receptor is a house located 500 feet northeast of the Project Site. However, while all construction activities will be contained within the boundaries of the construction work area, the greatest construction noise is expected to occur at the bridge overpass, which is roughly 860 feet from this residence. Closer to the bridge overpass is another residence located 670 feet directly southeast of the bridge across the Yuma Main Canal. Therefore, it is expected that this residence would experience the greatest noise impact during the short-term construction phase. Exhibit D below demonstrates the respective locations of the nearest homes in relation to the Project Site.

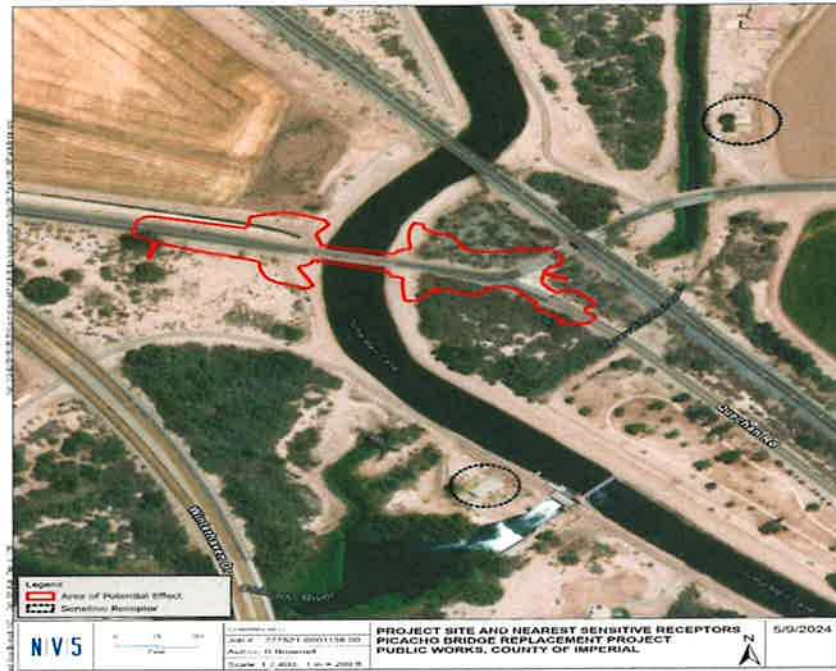


Exhibit D Project Site and Nearest Sensitive Receptors

Given that 600 feet is 50 feet doubled 3.5 times over, the maximum anticipated noise level at the home southeast of the site would be over 21 dBA (3.5 times 6 dBA) lower than the maximum levels shown in Table 7, or approximately 68 dBA for the noisiest pieces of equipment. This level of noise, if it were to persist in one sensitive receptor location over a period of 8-hours, would be lower than the County's 75 dB Leq (8-hour) noise standard.

While unlikely, even if the noisiest piece of equipment were to be used at the most eastern portion of the Project Site and persist over an 8-hour period, the maximum anticipated noise level at the home east of the site would be less than 71dBA (3 times 6 dBA lower than the noisiest piece of equipment).

In addition, construction activities are expected to be limited to the hours of 7 a.m. to 7 p.m. Monday through Friday and 9 a.m. to 5 p.m. on Saturday. Therefore, noise impacts associated with construction would be less than significant.

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

b) Vibration is sound radiated through the ground. Groundborne noise is the rumbling sound caused by vibration of building or structure surfaces. Typical outdoor sources of perceptible groundborne vibration are construction equipment and traffic on rough roads. During the long-term operational phase, development of the proposed Project would not result in groundborne vibration or noise levels in addition to the existing conditions in the Project Site. During the short-term construction phase, there may be relatively minor vibrations from the use of trucks or other equipment associated with construction activities. However, given the distance to the closest sensitive receptor (670 feet), this groundborne vibrations condition from construction equipment would be relatively minor, intermittent, short term and restricted to daytime hours.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Therefore, impacts related to excessive groundborne vibrations are anticipated to be less than significant.

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

☐
☐
☐
☒

c) The proposed Project is not located in the vicinity of an airport land use plan nor within two miles of a public airport. The nearest airport is the Yuma International Airport located five miles southeast of the proposed Project. Therefore, the proposed Project would not expose people residing or working in the Project Site to excessive noise levels and no impact would occur.

XIV. POPULATION AND HOUSING

This section addresses potential impacts on the population and housing associated with the proposed Project's implementation and includes a description of the existing environment. The proposed Project is located in the unincorporated area of Winterhaven, in Imperial County. The proposed Project is located approximately 60 miles east of El Centro, CA. Housing in the unincorporated portion of Imperial County is covered in the Housing Element. Population size and housing units in Imperial County Housing Element 2021 to 2029 are identified in Table 8 and the demographic composition based on the data provided in the Imperial County Housing Element 2021-2029 is identified in Table 9.

Table 8: Imperial County Population Inventory

	Unincorporated Area*	Total County	Percentage Unincorporated
Population (2020)	37,778	174,528	22%
Housing Units (2020)	35,331	180,378	20%
Household Size (Average) (2019)	n/a	3.81	n/a

* Includes all unincorporated areas beyond just census-designated places

Sources: California DOF, City/County Population and Housing Estimates and 2015-2019 ACS (Imperial County 2022)

Table 9: Unincorporated Imperial County Demographic Composition

Race	Unincorporated Area Population*	Percentage
White alone	58,135	70.9%
Black of African American alone	4,505	2.1%
American Indian and Alaska Native alone	887	1.3%
Asian alone	1,475	0.6%
Native Hawaiian and Other Pacific Islander alone	132	0.2%
Some Other Race alone	11,692	22.8%
Two or More Races	3,242	2.1%
total	13,973	n/a
Hispanic or Latino	10,646	76.2%
Not Hispanic or Latino	3,327	23.8%

*Includes only census-designated places in unincorporated Imperial County.

Source: 2015-2019 ACS (Imperial County 2022)

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
a) The proposed Project consists of a bridge replacement for more reliable transportation infrastructure, which would not induce population growth either directly or indirectly. The route is an important transportation route allowing access from the Fort Yuma Indian Reservation to downtown Winterhaven. There would be no impact.				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
b) The proposed Project proposes the replacement of the bridge located on Picacho Road. The proposed Project would not remove or construct housing or result in the displacement of housing available. The proposed project would result in no impacts on the displacement of existing or future housing, and a less than significant impact would occur.				

XV. PUBLIC SERVICES

This section addresses potential impacts on the public services associated with the proposed Project's implementation and includes a description of the existing environment.

Fire

The Imperial County Fire Department (ICFD) and the Office of Emergency Services (ICOES) provide medical services (BLS/ALS), fire protection, aircraft fire rescue, technical rescue, and hazards materials and incidents responses for incorporated Imperial County and through contracts to the unincorporated parts of the County. The proposed Project area is served by ICFD Station 8 (518 Railroad Ave, Winterhaven, CA 92283), approximately 1 mile west of the Project Site.

Police

The Imperial County Sheriff's Office (ICSO) provides law enforcement services to the County's unincorporated communities and contract cities. The Project Area is served by the Imperial County Sheriff's Station (513 2nd Ave, Winterhaven, CA 92283), approximately 1 mile west of the Project Site.

The Fort Yuma Quechan Indian Tribe is served by their local Quechan Police Department consisting of two chiefs, two sergeants, nine full-time patrol officers, and six full-time emergency dispatchers. The Quechan Police Department (450 N Quechan Drive Winterhaven, CA 92283) is located approximately less than one-half mile east of the proposed Project.

Schools

The nearest school to the proposed Project site is San Pasqual Valley High School administered by San Pasqual Valley Unified School District (676 Baseline Rd, Winterhaven, CA 92283), approximately 2 miles northeast of the Project Site.

Parks

The proposed Project is located approximately less than a mile from the Quechan Walking Trail Park, providing amenities such as children's playground equipment, picnic tables, benches, an open field, and barbeque areas.

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

The proposed Project will improve transportation infrastructure by replacing an existing bridge. Construction and operation of the proposed Project would not affect the area's population or induce population growth, as no habitable structures are proposed, and construction workers are anticipated to be from the local workforce.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
1) Fire Protection?	☐	☐	☒	☐
1) The bridge will not be constructed with flammable materials and will not require fire protection services when in operation. During construction, temporary lane closures and traffic detours along Picacho Road are expected and could adversely affect emergency service and response times during Project construction.				
2) Police Protection?	☐	☐	☒	☐
2) The proposed Project would not create a need for new or altered fire or police protection facilities. During construction, temporary lane closures and traffic detours along Picacho Road are expected and could adversely affect emergency service and response times during Project construction.				
3) Schools?	☐	☐	☐	☒
3) The nearest schools are at the San Pasqual Valley School District located approximately 1.75 miles northeast of the bridge. The project would not directly increase demand for public schools in the County. The project would not generate employment that would result in a considerable demand for school services. The project would not directly or indirectly induce population growth in the project area that would necessitate the need for new or expanded school services. The proposed Project would not have an effect on schools.				
4) Parks?	☐	☐	☐	☒
4) The Quechan Walking Trail Park is located approximately ¼ mile southeast of the bridge. The implementation of the project will not directly or indirectly induce population growth that would create a need for new or expanded park services. The proposed Project would not have an impact on this park.				
5) Other Public Facilities?	☐	☐	☐	☒
5) The public facilities include the Fort Yuma Health Care Center and Quechan Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge and the community of Winterhaven is located approximately 0.55 miles west of the bridge. A traffic detour plan will be provided to ensure access between the west and east sides of the bridge. As the project would not directly or indirectly induce population growth, implementation of the project would not create the need for new or expanded public facilities. The proposed Project would not have an impact on other Public Facilities.				

XVI. RECREATION

The proposed Project is located on Picacho Bridge which is within County ROW (Picacho Road) and crosses the Yuma Main Canal. Picacho Bridge provides transportation infrastructure for the County. The proposed Project will be located on the bridge and will include the replacement of the bridge. The Quechan Walking Trail Park is approximately half a mile southeast of the proposed Project and is the closest local recreational park under the jurisdiction of the Fort Yuma Reservation. The proposed Project will not have an impact on this park.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☐ | ☒ |
| a) The proposed Project is not likely to increase the use of existing neighborhoods, regional parks, or any other recreational facilities to the point that physical deterioration would occur or be accelerated. The Project proposes to replace the bridge that is already in place, therefore it is expected that once replaced no impact would occur regarding increase in recreations. | | | | |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment? | ☐ | ☐ | ☐ | ☒ |
| b) The proposed Project consists of the replacement and enhancement of the existing bridge on Picacho Road (County ROW). The proposed Project will not directly or indirectly incentivize the need for more recreational facilities or increase the use of existing parks. No impact is expected from the result of the proposed Project. | | | | |

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XVII. TRANSPORTATION

The proposed Project is located along Picacho Rd. (S-24) 0.4-miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East. The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. The purpose of the proposed Project is to replace the heavily deteriorated 7-span timber bridge with a new single span structure.

Would the project:

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

a) During the construction of the new bridge along the same alignment as the existing bridge, proposed Project-related traffic would be temporary. Traffic during construction would include workers traveling to and from the Project Site, trucks hauling construction materials to the Project Site, and transporting material off-site. Though the proposed Project would generate construction traffic on the local roadway network and along this section of the road the construction traffic would be temporary and occur throughout the day, generally during non-peak hours. As such, the construction traffic would not generate a substantial impact to the surrounding roadways. Therefore, construction traffic would not be expected to conflict with a program plan, ordinance or policy addressing the circulation system, and impacts would be less than significant.

The County General Plan's Circulation and Scenic Highways Element was adopted in 2008, prior to the closure of the existing bridge. The Circulation and Scenic Highways Element was prepared in conjunction with the Southern California Association of Governments (SCAG) Regional Transportation Plan, "Destination 2030," and other related transportation planning documents (County of Imperial, 2008). The Circulation and Scenic Highways Element included projected street segment configurations and volumes throughout the County, including for Picacho Road, which is designated as a Major Collector Road. Thus, traffic along this section of Picacho and over the bridge was anticipated and accommodated for in the Circulation and Scenic Highways Element. As the new bridge would be within the same alignment and have the same number of lanes as the existing bridge, operation of the proposed Project is not anticipated to generate an increase in traffic beyond the traffic accommodated for in the County's General Plan. Therefore, the proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, and operational impacts would be less than significant.

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

b) CEQA Guidelines 15064.3 states vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. CEQA Guidelines 15064.3 subdivision (b) provides several criteria for analyzing transportation impacts, including analyzing a project's VMT qualitatively when lead agencies may not be able to quantitatively estimate VMT for a project type. The proposed Project would replace an existing deteriorated bridge with a new bridge within the alignment of the existing bridge. The new bridge would have the same number of lanes (one [1] in each direction) as the existing bridge, but wider to compensate for foot and bicycle traffic. Additionally, the Governor's Office of Planning and Research (OPR) has developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which states replacement projects designed to improve the condition of existing transportation assets, including bridges, would not likely lead to a substantial or measurable increase in vehicle travel and, therefore, generally should not require an induced travel analysis (OPR; 2018). Thus, the proposed Project is anticipated to be consistent with CEQA Guidelines section 15064.3 subdivision (b) and impacts are expected to be less than significant.

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

c) The proposed Project would consist of the replacement of an existing severely deteriorated bridge with a new bridge designed to applicable County and AASHTO standards. As such, the proposed Project would not include a geometric design feature that would increase hazards or result in incompatible uses. The proposed Project would comply with the standards of Caltrans and ICFD. Additionally, the proposed Project would utilize standards as set out in the California Manual on Uniform Traffic Control Devices for operational traffic control devices as appropriate and would further incorporate traffic control measures that are designed to ensure the safety of all road users. Therefore, the proposed Project would result in less than significant impacts related to hazardous design features or incompatible uses.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Result in inadequate emergency access?	☐	☐	☒	☐

d) The proposed Project would be designed to applicable County and AASHTO standards and, as a result, provide adequate emergency access. The proposed Project would not reduce the number of traffic lanes or create physical barriers along Picacho Road. Therefore, the proposed Project would not include or create any physical barriers on roadways that would impede emergency access within the area or to the Project Site.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

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

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

☐ ☒ ☐ ☐

(i) No 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) were recorded in the Cultural Report (see Appendix C). The proposed Project is fully within the Fort Yuma Indian Reservation thus tribal consultation was undertaken with the Fort Yuma Quechan Tribe. A meeting was facilitated between the Bureau of Reclamation, Fort Yuma Quechan Historic Preservation Office, and NV5 to discuss requirements for conducting cultural resource projects on Tribal land in Spring 2021. Quechan HPO was granted for the completion of the California Historic Resources Information System search in Summer 2021. Quechan Tribal Historic Preservation Officer staff did not indicate any concern about Traditional Cultural Places within the Project Site. The proposed Project would result in less than significant impacts with the implementation of mitigation measure CUL-1 and CUL-2.

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

☐ ☒ ☐ ☐

(ii) There are no known resources in or near the Project Site that meet the criteria set forth in Public Resources Code Section 5024.1 to qualify for listing on the California Register of Historic Resources. The proposed Project would not cause significant impacts pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, less than significant impact would occur. The proposed Project would result in less than significant impacts with the implementation of mitigation measures CUL-1 and CUL-2.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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a) No relocation or expansion of water, wastewater treatment or stormwater drainage, electric power, natural gas, or

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
telecommunications is proposed. There would be no impact.				
b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
b) The proposed Project will not generate any new permanent demands on existing water supplies. Minimal water use would be required during construction. Impacts would be less than significant.				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
c) The proposed Project will not add to wastewater demands. There would be no impact.				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☒	☐	☐
d) The proposed Project will not add permanently to solid waste demands or generate excessive solid waste. Solid waste generation would occur during construction. Clean soil can be recycled, reused offsite, or reused as backfill thereby reducing the need to be disposed of at a landfill. In addition, through the implementation of Mitigation Measure UTIL-1, the County will encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible, by including waste minimization goals in bid specifications. The proposed Project will adhere to regulations and policies pursuant to applicable State, local, and County relating to solid waste including the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72) for the disposal of the old bridge debris. The impacts would be less than significant with the implementation of Mitigation Measure UTIL-1				
MM UTIL-1: Imperial County shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill where feasible. Implementing agencies shall incentivize construction contractors with waste minimization goals in bid specifications where feasible. Upon completion, the proposed Project will not add to solid waste demand or generate excessive solid waste. The proposed Project will comply with federal, state, and local regulations related to solid waste. Impacts would be less than significant with mitigation measures.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☒	☐	☐
e) The proposed Project will not add permanently to solid waste demands or generate excessive solid waste. Solid waste generation would occur during construction and would include the demolition debris from the removal of the old bridge and associated paved road surfaces. Clean soil can be recycled, reused offsite, or reused as backfill, thereby reducing the need to be disposed of at a landfill. In addition, through the implementation of Mitigation Measure UTIL-1, the County will encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible, by including waste minimization goals in bid specifications. The proposed Project will adhere to applicable County and state regulations and policies relating to solid waste handling and disposal, specifically the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72), . The impacts would be less than significant with the implementation of Mitigation Measure UTIL-1.				

XX. WILDFIRE

California Public Resources Code 4201-4204 directs CAL FIRE/State Fire Marshall to classify and map lands within SRAs into Fire Hazard Severity Zones (FHSZ) based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified as a major cause of wildfire spread. FHSZs fall into the following classifications: moderate, high, and very high. NV5 reviewed CAL FIRE's Fire Hazard Severity Zone Viewers (CAL FIRE 2022a and 2022b) and the CAL FIRE State Responsibility Area Fire Hazard Severity Zones map prepared for Imperial County (CAL FIRE 2022c) to see if the Project Site is located within a FHSZ. The viewer and map showed that the Project Site is not located within or adjacent to a designated FHSZ. More specifically, the Project Site is not located within or adjacent to a very high FHSZ.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

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

a) The California Board of Forestry and Fire Protection is tasked with classifying all lands within California for the purpose of determining the financial responsibility for wildfire protection and suppression. NV5 reviewed the State Responsibility Area Viewer (Board 2022) to see what specific wildfire prevention and suppression land classification the Project Site is located within. The viewer showed that the Project Site is located entirely within a Federal Responsibility Area. These are lands in the state where the federal government has the legal responsibility for providing fire protection; however, the County of Imperial has agreed to provide fire, medical, and other emergency services within the entire portion of the Fort Yuma Indian Reservation lying within Imperial County. The Project Site is not located within or adjacent to a State Responsibility Area (SRA).

The bridge is currently in poor condition and has safety concerns from age and outdated design standards. The bridge and roadway construction will adhere to industry accepted and standard construction designs and guidelines; it will comply with federal and state regulations for construction fire safety; and it will provide adequate emergency access. During construction, Picacho Road between Winterhaven Drive and Jackson Road will be closed to traffic and a detour route made available. The lane closures would be considered less than significant because they would be temporary and detour travel times and lengths will be minimal during construction. In addition, access to the parcels adjacent to the bridge will be maintained throughout construction with rerouting. Once completed, the new updated bridge and roadway would improve access for emergencies and evacuations for adjacent properties and the surrounding communities. The proposed Project would not reduce the number of traffic lanes or create physical barriers along Picacho Road that would impede access to or from the Project Site. Less than significant impacts are expected.

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

b) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The proposed Project is a bridge replacement project, which would not contain project occupants. The Project Site is located in a rural area of Imperial County that contains thousands of acres of flat farmland. Fort Yuma Quechan Tribe Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge over the Yuma Canal and the community of Winterhaven is located approximately 0.55 miles west of the bridge. The nearest residence is approximately 0.12 miles southeast of the bridge. The proposed Project is not anticipated to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, no impacts are expected.

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

c) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The proposed Project is a bridge replacement project that would not pose a risk of fire hazards or exacerbate the risk of fire. No roads, fuel breaks, emergency water sources, power lines, or other utilities will be installed, and the project would comply with federal and state regulations for construction fire safety. Therefore, no impacts are expected.

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

d) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The Project Site is located in a flat area with no high or steep natural slopes. The Project Site is not located with a downstream area or an area with landslides. Fort Yuma Quechan Tribe Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge over the Yuma Canal and the community of Winterhaven is located approximately 0.55 miles west of the bridge. The nearest residence is approximately 0.12 miles southeast of the bridge.

The bridge is currently in poor condition and has safety concerns from age and outdated design standards. The bridge and roadway construction will adhere to industry accepted and standard construction designs and guidelines and it will comply

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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with federal and state regulations for construction fire safety. Once completed, the new updated raised bridge and roadway would help to reduce flood risks. For these reasons described here within, the proposed Project is not anticipated to expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts are expected.

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

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

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Planner I
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

NV5

- Amanda Beck.....Biologist
- Eric Fuss.....Biologist
- Marie Barret.....Biologist
- Courtney Armusewicz, MCP.....Transportation Planner
- Laura Murphy.....Civil Engineer
- Lauren Burokas.....Environmental Planner
- Scott Molloy.....Land Development Manager
- Rebecca Davey.....Environmental Specialist
- Karry Blake.....Environmental Scientist
- Cecile Felsher.....Senior Consultant
- Kiran PallachullaSenior Water Resources Engineer

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

V. REFERENCES

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VI. MITIGATED NEGATIVE DECLARATION – County of Imperial

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

Project Name: Imperial County Project No. 6811, Picacho Road Bridge Replacement Project at Yuma Main Canal, Initial Study (IS) # 24-0037.

Project Applicant: Imperial County Public Works Department

Project Location: The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County. The Project Site is approximately 0.3 miles south of Interstate 8 (I-8), 0.6 miles east of First Street, and approximately 6 miles southeast of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).

Description of Project: The proposed Project is located at Picacho Bridge over Yuma Main Canal (Picacho Road, Winterhaven, CA 32.7358 N, 114.6241 W and within APN 056-600-011) and is intended to replace the existing bridge leading into the Townsite of Winterhaven in Supervisorial District 1. The proposed Project presents a unique opportunity to construct a modern bridge that implements Best Management Practices (BMPs) concurrently with transportation amenities. Due to cracking and outliving its useful life, the existing wood bridge must be replaced to support commerce, access to the Quechan Reservation and the Bard community, and provide a safer crossing of the Yuma Main Canal. The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association.

Due to its deteriorating condition, it is proposed to replace the existing bridge with a new Precast Prestressed Concrete Girder Bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The roadway profile is proposed to be raised to approximately 5 feet-4 inches higher than the existing condition, achieving a minimum of 2 feet of vertical clearance over the existing canal bank elevation per the BOR's *Engineering and O&M Guidelines for Crossings*.

The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders, and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge

VII. FINDINGS

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

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

☒

The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

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

NOTICE

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

2-27-2025 Jim Minnick
Date of Determination Jim Minnick, Director of Planning & Development Services

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


Applicant Signature

2/27/2025
Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)



**IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL
INITIAL STUDY (IS) # 24-0037**

MITIGATION MONITORING AND REPORTING PROGRAM

Introduction

The Mitigation Monitoring and Reporting Program (MMRP) supplements the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Picacho Road Bridge Replacement Project ("Project") by providing a mechanism by which all measures in the IS/MND are implemented. The MMRP will be adopted by the County of Imperial (County) Planning Commission in conjunction with the Project.

Purpose of the Mitigation Monitoring and Reporting Program

As the lead agency, the County is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code as identified below:

(a) When making the findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:

(1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

(2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the IS/MND and drafted to meet the requirements of the California Environmental Quality Act (CEQA) Guidelines, Section 15097.

Mitigation Monitoring and Reporting Program Table

Project-specific mitigation measures are contained in the MMRP Table below. The table describes the specific mitigation measures, the responsible party that must comply with the mitigation measure, the regulatory agency having approval of and oversight over the mitigation measure, and the mitigation timeframe describing the timing and/or time range that applies to the mitigation measure. The MMRP will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL
INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURE	RESPONSIBLE PARTY	REGULATORY AGENCY	MITIGATION TIMEFRAME
SECTION II. AGRICULTURE AND FOREST RESOURCES			
MM AG-1: Create an on-site buffer zone surrounding the Project Site to ensure no indirect impacts would occur to surrounding agricultural lands. It is recommended the County will need to obtain a signed statement from adjacent property owners stating that no indirect impacts will occur to their property.	Imperial County	Imperial County	Prior to the Start of Construction
SECTION IV. BIOLOGICAL RESOURCES			
MM BIO-1: Nesting surveys by qualified biologists during nesting season (February through August); preferably time construction during non-nesting season (September through January). Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities.	Imperial County, Project Biologist		February through August (Breeding Season), Prior to the Start of Construction
MM BIO-2: Worker environmental awareness training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW): • Biology and status; • Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas; • Reporting procedures to be used if a species is encountered in the field; and driving procedures and techniques, for commuting, and driving on, to the Project Site; • Identification of nesting birds and procedures to follow if nesting is suspected.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Prior to the Start of Construction
SECTION V. CULTURAL RESOURCES			
MM CUL-1: In all phases of construction work an Inadvertent Discovery Plan should be developed and shared with staff on-site. If archaeological or cultural resources are encountered during project work, all work in the immediate vicinity of the find will be suspended until assessed by the qualified archaeologist and a treatment is determined.	Imperial County, Project Archaeologist	Imperial County, NAHC, and Quenchan Tribe	Prior to the Start of Construction, and Throughout Construction Process
MM CUL-2: Should human remains be encountered during ground disturbing activities; all work will cease, and the County Medical Examiner will be contacted.	Imperial County, County Medical Examiner, Project Archaeologist		Throughout Construction Process
SECTION VII. GEOLOGY AND SOILS			
MM GEO-1: Prior to earthmoving activities, a certified geotechnical engineer or equivalent, shall perform a final geotechnical evaluation of the soils. The evaluation will follow the requirements of California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2. related to expansive soils and soil conditions. The structural design, tests and inspections, and soils and foundation standards will be in accordance with requirements from California Building Code Title 24, Part 2, Chapter 16, 17, and 18. The final geotechnical evaluation shall include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures, including threats from liquefaction, subsidence, lateral spreading, or collapse. The grading and improvement plan for each phase of the project shall be designed in accordance with the recommendations provided in the final geotechnical evaluation.	Imperial County, Project Geotechnical Engineer or Equivalent	Imperial County	Prior to the Start of Construction

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IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL
INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURE	RESPONSIBLE PARTY	REGULATORY AGENCY	MITIGATION TIMEFRAME
SECTION IX. HAZARDS AND HAZARDOUS MATERIALS			
MM HAZ-1: If in-situ potentially hazardous materials are encountered, all construction in the vicinity of the encounter will be halted. All construction contractors shall immediately stop all surface or subsurface activities in the event that potentially hazardous materials are encountered, an odor is identified, or considerably stained soil is visible. Contractors shall follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. These requirements shall be included in the contractor's specifications. If any hazardous materials, waste sites, or vapor intrusion risks are identified prior to or during construction, a qualified professional, in consultation with appropriate regulatory agencies, will develop and implement a plan to remediate the contamination and properly dispose of the contaminated material. If material imports are proposed, the contractor shall furnish the County of Imperial or its representative with appropriate documentation certifying that the imported materials are free of contamination.	Imperial County	Imperial County	Throughout Construction Process
MM HAZ-2: Implementing agencies shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to subsols and groundwater. A BMP Maintenance Plan shall be prepared by Implementing Agencies upon approval of the BMP projects that identify the frequency and procedures for removal and/or replacement of accumulated debris, surface soils, and/or media (to a depth where constituent concentrations do not represent a hazardous condition and/or have the potential to migrate further and impact groundwater) to avoid the accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsols and groundwater. Structural BMPs shall be designed to prevent the migration of constituents that may impact groundwater.	Imperial County	Imperial County	Prior to the Start of Construction, and Throughout Construction Process
SECTION XIX. UTILITIES AND SERVICE SYSTEMS			
MM UTIL-1: Implementing agencies shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill where feasible. Implementing agencies shall incentivize construction contractors with waste minimization goals in bid specifications where feasible. Upon completion, the proposed Project will not add to solid waste demand or generate excessive solid waste. The proposed Project will comply with federal, state, and local regulations related to solid waste. Impacts would be less than significant with mitigation measures.	Imperial County	Imperial County	Throughout Construction Process

IS#24-0037
APPLICATION

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Picacho Bridge Project Detailed Report

Table of Contents

1. Basic Project Information	
1.1. Basic Project Information	
1.2. Land Use Types	
1.3. User-Selected Emission Reduction Measures by Emissions Sector	
2. Emissions Summary	
2.1. Construction Emissions Compared Against Thresholds	
2.2. Construction Emissions by Year, Unmitigated	
2.3. Construction Emissions by Year, Mitigated	
3. Construction Emissions Details	
3.1. Linear, Grubbing & Land Clearing (2024) - Unmitigated	
3.2. Linear, Grubbing & Land Clearing (2024) - Mitigated	
3.3. Linear, Grading & Excavation (2024) - Unmitigated	
3.4. Linear, Grading & Excavation (2024) - Mitigated	
3.5. Linear, Drainage, Utilities, & Sub-Grade (2024) - Unmitigated	

3.6. Linear, Drainage, Utilities, & Sub-Grade (2024) - Mitigated

3.7. Linear, Paving (2024) - Unmitigated

3.8. Linear, Paving (2024) - Mitigated

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

- 5.3.1. Unmitigated
- 5.3.2. Mitigated
- 5.4. Vehicles
 - 5.4.1. Construction Vehicle Control Strategies
- 5.5. Architectural Coatings
- 5.6. Dust Mitigation
 - 5.6.1. Construction Earthmoving Activities
 - 5.6.2. Construction Earthmoving Control Strategies
- 5.7. Construction Paving
- 5.8. Construction Electricity Consumption and Emissions Factors
- 5.18. Vegetation
 - 5.18.1. Land Use Change
 - 5.18.1.1. Unmitigated
 - 5.18.1.2. Mitigated
 - 5.18.1. Biomass Cover Type
 - 5.18.1.1. Unmitigated
 - 5.18.1.2. Mitigated

- 5.18.2. Sequestration
 - 5.18.2.1. Unmitigated
 - 5.18.2.2. Mitigated
- 6. Climate Risk Detailed Report
 - 6.1. Climate Risk Summary
 - 6.2. Initial Climate Risk Scores
 - 6.3. Adjusted Climate Risk Scores
 - 6.4. Climate Risk Reduction Measures
- 7. Health and Equity Details
 - 7.1. CalEnviroScreen 4.0 Scores
 - 7.2. Healthy Places Index Scores
 - 7.3. Overall Health & Equity Scores
 - 7.4. Health & Equity Measures
 - 7.5. Evaluation Scorecard
 - 7.6. Health & Equity Custom Measures
- 8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Picacho Bridge Project
Construction Start Date	1/1/2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.40
Precipitation (days)	4.80
Location	32.735839, -114.624
County	Imperial
City	Unincorporated
Air District	Imperial County APCD
Air Basin	Salton Sea
TAZ	5614
EDFZ	19
Electric Utility	Imperial Irrigation District
Gas Utility	Southern California Gas
App Version	2022.1.1.19

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Bridge/Overpass Construction	0.30	Mile	0.04	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-10-C	Water Unpaved Construction Roads

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.64	7.28	63.7	67.0	0.12	2.89	82.1	85.0	2.66	8.30	11.0	—	14,334	14,334	0.58	0.14	3.18	14,394
Mit.	8.64	7.28	63.7	67.0	0.12	2.89	82.1	85.0	2.66	8.30	11.0	—	14,334	14,334	0.58	0.14	3.18	14,394
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.54	7.18	63.8	64.1	0.12	2.89	82.1	85.0	2.66	8.30	11.0	—	14,206	14,206	0.58	0.14	0.08	14,262
Mit.	8.54	7.18	63.8	64.1	0.12	2.89	82.1	85.0	2.66	8.30	11.0	—	14,206	14,206	0.58	0.14	0.08	14,262
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.35	1.98	17.8	17.9	0.04	0.78	21.5	22.3	0.72	2.18	2.89	—	3,996	3,996	0.16	0.04	0.38	4,012
Mit.	2.35	1.98	17.8	17.9	0.04	0.78	21.5	22.3	0.72	2.18	2.89	—	3,996	3,996	0.16	0.04	0.38	4,012

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.63	0.53	4.53	4.54	0.01	0.27	—	0.27	0.25	—	0.25	—	632	632	0.03	0.01	—	634
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.19	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.0	26.0	< 0.005	< 0.005	—	26.1
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.30	4.30	< 0.005	< 0.005	—	4.32
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

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[illegible]

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.06	0.54	0.00	0.00	10.3	10.3	0.00	1.04	1.04	—	99.7	99.7	0.01	< 0.005	0.01	101
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.42	0.42	0.00	0.04	0.04	—	4.40	4.40	< 0.005	< 0.005	0.01	4.46
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	0.08	0.08	0.00	0.01	0.01	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Linear, Grading & Excavation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)																		
Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	8.20	6.89	63.3	60.3	0.12	2.89	—	2.89	2.66	—	2.66	—	13,476	13,476	0.55	0.11	—	13,522
Dust From Material Movement	—	—	—	—	—	—	2.48	2.48	—	0.27	0.27	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	7.51	< 0.005	0.75	—	32.1	32.1	< 0.005	< 0.005	0.09	33.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.33	0.28	0.43	3.81	0.00	0.00	72.1	0.00	7.28	—	698	698	0.04	0.03	0.08	706
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	7.51	< 0.005	0.75	—	32.1	32.1	< 0.005	< 0.005	< 0.005	33.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.07	0.79	0.00	0.00	11.7	0.00	1.18	—	123	123	0.01	< 0.005	0.22	125
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.22	< 0.005	0.12	—	5.27	5.27	< 0.005	< 0.005	0.01	5.50
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	2.14	0.00	0.22	—	20.4	20.4	< 0.005	< 0.005	0.04	20.7
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.22	< 0.005	0.02	—	0.87	0.87	< 0.005	< 0.005	< 0.005	0.91
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Linear, Grading & Excavation (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	8.20	6.89	63.3	60.3	0.12	2.89	—	2.89	2.66	—	2.66	—	13,476	13,476	0.55	0.11	—	13,522

Off-Road Equipment	5.68	4.76	46.1	40.5	0.09	1.89	—	1.89	1.74	—	1.74	—	10,049	10,049	0.41	0.08	—	10,083
Dust From Material Movement	—	—	—	—	—	2.07	2.07	0.22	0.22	—	0.22	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.70	5.88	0.01	0.27	—	0.27	0.25	—	0.25	—	1,459	1,459	0.06	0.01	—	1,464
Dust From Material Movement	—	—	—	—	—	0.30	0.30	0.03	0.03	—	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.22	1.07	< 0.005	0.05	—	0.05	0.05	—	0.05	—	242	242	0.01	< 0.005	—	242
Dust From Material Movement	—	—	—	—	—	0.05	0.05	0.01	0.01	—	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.24	0.23	4.14	0.00	0.00	0.00	0.00	0.00	4.51	4.51	—	511	511	0.02	1.91	—	519

Worker	0.03	0.03	0.04	0.43	0.00	0.00	6.40	6.40	0.00	0.00	0.65	0.65	—	67.4	67.4	< 0.005	< 0.005	0.12	68.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	1.17	1.17	0.00	0.00	0.12	0.12	—	11.2	11.2	< 0.005	< 0.005	0.02	11.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Linear, Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.79	0.66	6.31	8.85	0.01	0.30	—	0.30	0.28	—	0.28	—	1,337	1,337	0.05	0.01	—	1,341
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.56	< 0.005	0.02	—	0.02	0.02	0.02	0.02	—	84.2	84.2	< 0.005	< 0.005	—	84.5
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	—	13.9	13.9	< 0.005	< 0.005	—	14.0

Off-Road Equipment	0.79	0.66	6.31	8.85	0.01	0.30	—	0.30	—	0.28	—	1,337	1,337	0.05	0.01	—	1,341
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.56	< 0.005	0.02	—	0.02	0.02	0.02	—	84.2	84.2	< 0.005	< 0.005	—	84.5
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005	—	13.9	13.9	< 0.005	< 0.005	—	14.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.59	0.00	0.00	17.2	17.2	0.00	0.00	1.73	197	197	0.01	0.01	0.74	200
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.07	0.00	0.00	1.07	1.07	0.00	0.00	0.11	11.3	11.3	< 0.005	< 0.005	0.02	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

[illegible]

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

[illegible]

[illegible]

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

[illegible]

Linear, Grubbing & Land Clearing	Linear, Grubbing & Land Clearing	1/1/2024	1/22/2024	5.00	15.0	—
Linear, Grading & Excavation	Linear, Grading & Excavation	1/23/2024	4/16/2024	5.00	60.0	—
Linear, Drainage, Utilities, & Sub-Grade	Linear, Drainage, Utilities, & Sub-Grade	4/17/2024	6/30/2024	5.00	53.0	—
Linear, Paving	Linear, Paving	7/1/2024	8/2/2024	5.00	23.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Linear, Grubbing & Land Clearing	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Grubbing & Land Clearing	Crawler Tractors	Diesel	Average	1.00	8.00	87.0	0.43
Linear, Grubbing & Land Clearing	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Linear, Grading & Excavation	Graders	Diesel	Average	2.00	8.00	148	0.41
Linear, Grading & Excavation	Excavators	Diesel	Average	4.00	8.00	36.0	0.38
Linear, Grading & Excavation	Crawler Tractors	Diesel	Average	2.00	8.00	87.0	0.43
Linear, Grading & Excavation	Cranes	Diesel	Average	1.00	8.00	367	0.29
Linear, Grading & Excavation	Rollers	Diesel	Average	3.00	8.00	36.0	0.38
Linear, Grading & Excavation	Rubber Tired Loaders	Diesel	Average	3.00	8.00	150	0.36
Linear, Grading & Excavation	Scrapers	Diesel	Average	4.00	8.00	423	0.48

Picacho Bridge Project Detailed Report, 9/16/2023

Linear, Grading & Excavation	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Grading & Excavation	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Drainage, Utilities, & Sub-Grade	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Drainage, Utilities, & Sub-Grade	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Drainage, Utilities, & Sub-Grade	Scrapers	Diesel	Average	4.00	8.00	423	0.48
Linear, Drainage, Utilities, & Sub-Grade	Rough Terrain Forklifts	Diesel	Average	1.00	8.00	96.0	0.40
Linear, Drainage, Utilities, & Sub-Grade	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43
Linear, Drainage, Utilities, & Sub-Grade	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Linear, Drainage, Utilities, & Sub-Grade	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Linear, Drainage, Utilities, & Sub-Grade	Graders	Diesel	Average	2.00	8.00	148	0.41
Linear, Drainage, Utilities, & Sub-Grade	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Linear, Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Linear, Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Linear, Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Linear, Paving	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Paving	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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Linear, Grubbing & Land Clearing	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Grubbing & Land Clearing	Crawler Tractors	Diesel	Average	1.00	8.00	87.0	0.43
Linear, Grubbing & Land Clearing	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Linear, Grading & Excavation	Graders	Diesel	Average	2.00	8.00	148	0.41
Linear, Grading & Excavation	Excavators	Diesel	Average	4.00	8.00	36.0	0.38
Linear, Grading & Excavation	Crawler Tractors	Diesel	Average	2.00	8.00	87.0	0.43
Linear, Grading & Excavation	Cranes	Diesel	Average	1.00	8.00	367	0.29
Linear, Grading & Excavation	Rollers	Diesel	Average	3.00	8.00	36.0	0.38
Linear, Grading & Excavation	Rubber Tired Loaders	Diesel	Average	3.00	8.00	150	0.36
Linear, Grading & Excavation	Scrapers	Diesel	Average	4.00	8.00	423	0.48
Linear, Grading & Excavation	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Grading & Excavation	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Drainage, Utilities, & Sub-Grade	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82
Linear, Drainage, Utilities, & Sub-Grade	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Drainage, Utilities, & Sub-Grade	Scrapers	Diesel	Average	4.00	8.00	423	0.48
Linear, Drainage, Utilities, & Sub-Grade	Rough Terrain Forklifts	Diesel	Average	1.00	8.00	96.0	0.40
Linear, Drainage, Utilities, & Sub-Grade	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43

Linear, Drainage, Utilities, & Sub-Grade	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Linear, Drainage, Utilities, & Sub-Grade	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Linear, Drainage, Utilities, & Sub-Grade	Graders	Diesel	Average	2.00	8.00	148	0.41
Linear, Drainage, Utilities, & Sub-Grade	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Linear, Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Linear, Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Linear, Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Linear, Paving	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Linear, Paving	Signal Boards	Electric	Average	0.00	8.00	6.00	0.82

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Linear, Grubbing & Land Clearing	—	—	—	—
Linear, Grubbing & Land Clearing	Worker	7.50	18.5	LDA,LDT1,LDT2
Linear, Grubbing & Land Clearing	Vendor	0.00	10.2	HHDT,MHDT
Linear, Grubbing & Land Clearing	Hauling	0.00	20.0	HHDT
Linear, Grubbing & Land Clearing	Onsite truck	—	—	HHDT
Linear, Grading & Excavation	—	—	—	—
Linear, Grading & Excavation	Worker	52.5	18.5	LDA,LDT1,LDT2
Linear, Grading & Excavation	Vendor	1.00	10.2	HHDT,MHDT
Linear, Grading & Excavation	Hauling	0.00	20.0	HHDT
Linear, Grading & Excavation	Onsite truck	—	—	HHDT

Linear, Drainage, Utilities, & Sub-Grade	—	—	—	—
Linear, Drainage, Utilities, & Sub-Grade	Worker	32.5	18.5	LDA,LDT1,LDT2
Linear, Drainage, Utilities, & Sub-Grade	Vendor	0.00	10.2	HHDT,MHDT
Linear, Drainage, Utilities, & Sub-Grade	Hauling	0.00	20.0	HHDT
Linear, Drainage, Utilities, & Sub-Grade	Onsite truck	—	—	HHDT
Linear, Paving	—	—	—	—
Linear, Paving	Worker	12.5	18.5	LDA,LDT1,LDT2
Linear, Paving	Vendor	0.00	10.2	HHDT,MHDT
Linear, Paving	Hauling	0.00	20.0	HHDT
Linear, Paving	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Linear, Grubbing & Land Clearing	—	—	—	—
Linear, Grubbing & Land Clearing	Worker	7.50	18.5	LDA,LDT1,LDT2
Linear, Grubbing & Land Clearing	Vendor	0.00	10.2	HHDT,MHDT
Linear, Grubbing & Land Clearing	Hauling	0.00	20.0	HHDT
Linear, Grubbing & Land Clearing	Onsite truck	—	—	HHDT
Linear, Grading & Excavation	—	—	—	—
Linear, Grading & Excavation	Worker	52.5	18.5	LDA,LDT1,LDT2
Linear, Grading & Excavation	Vendor	1.00	10.2	HHDT,MHDT
Linear, Grading & Excavation	Hauling	0.00	20.0	HHDT
Linear, Grading & Excavation	Onsite truck	—	—	HHDT
Linear, Drainage, Utilities, & Sub-Grade	—	—	—	—
Linear, Drainage, Utilities, & Sub-Grade	Worker	32.5	18.5	LDA,LDT1,LDT2
Linear, Drainage, Utilities, & Sub-Grade	Vendor	0.00	10.2	HHDT,MHDT
Linear, Drainage, Utilities, & Sub-Grade	Hauling	0.00	20.0	HHDT

Linear, Drainage, Utilities, & Sub-Grade	Onsite truck	—	—	HHDT
Linear, Paving	—	—	—	—
Linear, Paving	Worker	12.5	18.5	LDA, LDT1, LDT2
Linear, Paving	Vendor	0.00	10.2	HHDT, MHD
Linear, Paving	Hauling	0.00	20.0	HHDT
Linear, Paving	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied		PM10 Reduction		PM2.5 Reduction	
Apply dust suppressants to unpaved roads		84%		84%	
Limit vehicle speeds on unpaved roads to 25 mph		44%		44%	
Sweep paved roads once per month		9%		9%	

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
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5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Linear, Grubbing & Land Clearing	—	—	0.04	0.00	—
Linear, Grading & Excavation	—	—	0.04	0.00	—
Linear, Drainage, Utilities, & Sub-Grade	—	—	0.04	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Bridge/Overpass Construction	0.04	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	457	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1 Unmitigated

Vegetation/Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2 Mitigated

Vegetation/Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.3 Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	37.6	annual days of extreme heat
Extreme Precipitation	0.60	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	1.90	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	5	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A

Flooding	N/A	N/A	N/A	N/A	N/A
Drought	1	1	1	2	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract				
Exposure Indicators	—				
AQ-Ozone	50.6				
AQ-PM	38.0				
AQ-DPM	11.2				
Drinking Water	31.1				
Lead Risk Housing	31.5				
Pesticides	82.2				
Toxic Releases	61.4				
Traffic	37.0				
Effect Indicators	—				
CleanUp Sites	0.00				
Groundwater	30.9				

Haz Waste Facilities/Generators	16.6
Impaired Water Bodies	43.8
Solid Waste	0.00
Sensitive Population	—
Asthma	9.57
Cardio-vascular	36.1
Low Birth Weights	—
Socioeconomic Factor Indicators	—
Education	76.0
Housing	25.7
Linguistic	68.4
Poverty	96.2
Unemployment	99.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	14.21788785
Employed	1.680995765
Median H	5.800076992
Education	—
Bachelors or higher	13.64044655
High school enrollment	6.313358142
Preschool enrollment	88.27152573
Transportation	—
Auto Access	6.557166688

Active commuting	33.31194662
Social	—
2-parent households	15.32144232
Voting	0.590273322
Neighborhood	—
Alcohol availability	74.90055178
Park access	23.94456564
Retail density	4.824842808
Supermarket access	16.04003593
Tree canopy	30.71987681
Housing	—
Homeownership	31.90042346
Housing habitability	45.04042089
Low-inc homeowner severe housing cost burden	92.78839985
Low-inc renter severe housing cost burden	91.89015783
Uncrowded housing	40.97266778
Health Outcomes	—
Insured adults	19.41485949
Arthritis	0.0
Asthma ER Admissions	83.7
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	4.2

Cognitively Disabled	16.7
Physically Disabled	7.2
Heart Attack ER Admissions	44.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	31.0
Elderly	19.2
English Speaking	62.0
Foreign-born	6.5
Outdoor Workers	25.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	95.5
Traffic Density	2.1
Traffic Access	23.0
Other Indices	—
Hardship	90.5

Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	40.0
Healthy Places Index Score for Project Location (b)	3.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Healthy Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Trips and VMT	—
Construction: On-Road Fugitive Dust	Assumes travel is on 95% paved roads for worker trips.

Natural Environment Study

(Minimal Impacts)

Picacho Road at Bridge Improvement Project

*Imperial County, California north of the Township of Winterhaven and west of the
City of Yuma, Arizona*

Picacho Road Bridge

February 2023

Revised August, 2024

Prepared By and Certified as performed in accordance with established biological
practices by:



Marie Barrett
Biologist
Barrett's Biological Surveys
(760) 427 7006

26 August 2024

Summary

The Picacho Road at Yuma Main Canal Bridge Improvement Project (“project”) involves emergency replacement to the existing Picacho Road bridge. Deficiencies have caused the bridge to be rated as structurally deficient. The purpose of the project is to provide safe passage for the commuters, residents, freight, and emergency responders over Yuma Main Canal at Picacho Road. The project, with avoidance, minimization and mitigation measures, would not cause adverse impacts to environment.

The project site is approximately ½ mile east of the town of Winterhaven, California, along the California/Arizona border. The project site is comprised of 2.8 acres and includes the Picacho Road bridge, the intersection of Picacho Road and Quechan Road, and adjacent right-of-way and offsite areas. General reconnaissance biological surveys of the project site were conducted on November 5, 2022, August 8, 2024 (AM/PM), and August 9, 2024.

No special-status plant and no special-status wildlife species were found to occur within the Biological Study Area. The project would not result in impacts to habitats/Natural Communities of Special Concern or endangered, threatened, or plant or animal species of concern. Bank swallows were observed in the project buffer zone, however, no nests were observed on site. No swallows or bats were observed nesting under the bridge. Pre-construction nesting bird surveys should be conducted during the nesting season (February through August) and worker environmental awareness training is recommended to minimize the potential for impacts to nesting birds from construction activities. Any invasive plant should be removed in a manner that will not spread seeds or root material. All equipment will be cleaned prior to being onsite. Worker environmental awareness training is recommended to minimize the potential for invasive plants to spread within and outside of the project site.

This report presents the findings of two general reconnaissance biological surveys. No jurisdiction delineation issues occur and no special-status plant or special-status wildlife species were found to occur within the Biological Study Area; migratory bird nesting can occur. Therefore, preconstruction surveys are recommended.

Table of Contents

Summary	i
1. Introduction	4
1.1 History	4
1.2 Project Purpose and Need	4
2. Study Methods	5
2.1 Regulatory Requirements	5
2.1.1 Federal Endangered Species Act	6
2.1.2 Migratory Bird Treaty Act	6
2.1.3 California Endangered Species Act	7
2.2 Studies Required	7
2.2.1 Literature Search	7
2.2.2 Survey Methodologies	7
2.2.3 Personnel and Survey Dates	7
2.2.4 Limitations That May Influence Results	8
3. Results: Environmental Setting	8
3.1 Description of the Existing Biological and Physical Conditions	8
3.1.1 Biological Study Area (BSA)	8
3.1.2 Physical Conditions	8
3.1.3 Biological Conditions in the Study Area	11
3.1.4 Habitat Connectivity	12
3.2 Regional Species and Habitats/Natural Communities of Concern	12
3.2.1 Habitat/Natural Communities of Special Concern	12
3.2.2 Special-Status Plant Species	13
3.2.3 Special-Status Animal Species	13
4. Results: Biological Resources, Discussion of Impacts & Mitigation	13
4.1 Habitats/Natural Communities of Special Concern	13
4.2 Special-Status Plant Species	13
4.2.1 Discussion of Plant Species	13
4.3 Special-Status Animal Species	14
4.3.1 Discussion of Animal Species	15
5. Conclusions & Regulatory Determination	16

5.1	Agency Coordination	16
6.	References.....	16
7.	Appendix.....	17

1. Introduction

1.1 History

The project is located approximately 0.53 miles east of the Township of Winterhaven in Imperial County, at the crossing of Picacho Road (S24) and Yuma Main Canal. The original bridge was built in 1925 and has been in service for 96 years; 46 years past its functional design life. It was designed as a 5-span bridge, 19-foot spans, all timber superstructure and substructure. In 1931, the bridge was extended by adding a 19' span on each end with new R.C. abutments, and was also raised by 2 feet using a solid redwood cap. The Redwood timber superstructure was replaced and AC surfacing was used as a riding surface. In February of 1943, the inspection report noted multiple cracks in the AC surfacing, and also pointed out that "the bridge is taking a considerable amount of military traffic". Subsequent to that report, a heavy asphaltic mix blanket was placed over the entire deck. In 1944, the AC surfacing continued to have several cracks. In 1945, some deck patching done but not all. In 1946, more cracks were found; no repair was done due to anticipated re-decking of the entire bridge. In 1951, deck cracks were noted by an inspector. In 1955 considerable horizontal cracking was noted, but no recommendations were made. In 1956, cracking was progressing, probably due to reactive aggregate. One stringer was found to be broken and needed to be supplemented. These deficiencies have caused the bridge to be rated as structurally deficient.

Project Purpose and Need

The project is located approximately 0.28 miles north of Interstate 8 along Picacho Road where it crosses the Yuma Main Canal in Imperial County, California. The project site consists of 2.8 acres. Picacho Road (S24) is an essential farm to market road and directly connects to I-8 via the bridge and ensuring access to this route is critical. Due to cracking and outliving its useful life, the bridge must be replaced to support commerce, access to the Quechan Reservation and the Bard community.

Project Objectives include:

- Safety – Bridge, Railings, and Approaches need to be designed to current Standards
- Durability – 75-Year Design Life has been greatly exceeded
- Meeting all stakeholders' reasonable concerns to ensure a successful buildout

Picacho Road is a farm to market road and provides emergency services access to a rural community. Picacho Road is an east/west road that offers direct access to I-8 and Quechan Road which accesses Bard and Yuma for local commuters as well as farming. Replacing the bridge structure will improve safety for all commuters that either live, or work along that stretch of Picacho Road and for emergency response vehicles.

Project Timeline:

- Phase 1 – Prelim. Bridge Strategy Report and CEQA/NEPA Clearance
- Site Investigation
- Strategy Report/Type Selection Report

-
- Surveying Services and Geotechnical Investigations
 - Detour / Traffic Evaluation
 - Environmental Documentation
 - Phase 2 – Final Design and Permitting
 - Phase 3 – Bidding and Construction Support Services

The Picacho Road Bridge over the Yuma Main Canal and is located along Picacho Road in Winterhaven, CA. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County. The Project Site is approximately .3 miles south of Interstate 8 (I-8), 0.6 miles east of First Street, and approximately 6 miles southeast of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the South Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users Association (YCWUA).

The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association. The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders, and a 6'-0" wide sidewalk on the north side of the bridge.

All construction activities will be contained within the area highlighted by the red boundary (attached map). The total construction work area is approximately 2.8 acres. Tree removal and removal of other vegetation adjacent to the site will be necessary for the proposed Project. Existing vegetation will need to be cleared and grubbed prior to grading operations. Temporary construction easements will be needed to facilitate utility relocations and allow construction access. Construction is anticipated to last for a period of one year. All construction activities such as site preparation, grading, utility relocation, and site restoration would be contained within the construction work area.

This report addresses environmental documentation.

2. Study Methods

2.1 Regulatory Requirements

The primary regulations affecting biological resource impacts are discussed in this section. If construction of this project, or related activities associated with construction, impact federal- and/or state-listed species, the project may be subject to the California Endangered Species Act (CEPA) and the federal Endangered Species Act (ESA). If activities directly impact migratory birds or cause the destruction or abandonment of nests, the project would be subject to the

Migratory Bird Treaty Act. Additional regulations could also apply to the project. The following paragraphs provide a brief summary of the applicable provisions of these regulations.

2.1.1 Federal Endangered Species Act

The federal ESA provides protection for plants and animals listed as threatened or endangered by U.S. Wildlife and Forestry Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Marine Fisheries Service. Section 9 of the ESA (50 CFR 17.3) prohibits the take, possession, sale, or transport of any federal ESA-listed species. Take is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, capture, collect, or attempt to engage in any such conduct” (16 U.S. Code [USC] Section 1532(19)). Federal regulation 50 CFR 17.3 further defines the term harm in the take definition to mean any act that actually kills or injures a federally listed species, including significant habitat modification or degradation. For plants, the federal ESA prohibits removing, possessing, maliciously damaging, or destroying any listed plant on areas under federal jurisdiction, and removing, cutting, digging up, damaging, or destroying any listed plant on non-federal land in knowing violation of state law (16 USC Section 1538(a)(2)(B)).

The federal ESA requires the federal government to designate critical habitat for any species listed under the federal ESA but also allows areas to be excluded from critical habitat (16 USC Section 1533(b)(2)). Critical habitat is a specific area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may also include specific areas outside the geographical area occupied by the species if the agency determines that the area itself is essential for conservation.

Section 7 of the federal ESA requires federal agencies to consult with USFWS and/or NOAA Marine Fisheries Service for any federal activity that may affect any federally listed species or its critical habitat. Informal consultation may precede and obviate the need for formal consultation if USFWS and/or NOAA Marine Fisheries Service concur that the proposed agency action is not likely to adversely affect listed species. In the formal consultation process, USFWS and/or NOAA Marine Fisheries Service must issue a Biological Opinion as to the potential for effect to listed species. USFWS and/or NOAA Marine Fisheries Service may issue an incidental take permit, allowing take of the species that is incidental to an authorized activity, provided that the action will not jeopardize the continued existence of the species. Section 10(a) of the ESA provides for issuance of incidental take permits for private actions that have no federal involvement, through the development of a Habitat Conservation Plan (HCP).

2.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) provides protection for migratory birds. Conditions for permits to “take” migratory birds (as defined in the MBTA) are set forth in 50 CFR Part 13 [General Permit Procedures] and 50 CFR Part 21 [Migratory Bird Permits]). Unless expressly authorized in the regulations or by permit, activities such as hunting, pursuing, capturing, killing, selling, and shipping migratory birds are prohibited. The MBTA allows USFWS to issue permits to qualified applicants for certain types of activities. This protection extends to all migratory birds, parts, nests, and eggs. The full list of species protected under this act is found in 50 CFR 10.13.

2.1.3 California Endangered Species Act

The California Endangered Species Act (CESA) provides protection for candidate plants and animal species as well as those listed as threatened or endangered by CDFW. CESA prohibits the take of any such species unless authorized; however, California case law has not interpreted habitat destruction, alone, as included in the state's definition of take. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (Cal. Fish and Game Code §86). CDFW administers the act and authorizes take through Section 2081 agreements, Section 2080.1 consistency determinations (for species that are also listed under the federal ESA) or NCCPs.

2.1.4 Porter-Cologne Water Quality Control Act, as amended

This act is administered by the State Water Resource Control Board (SWRCB) to protect water quality and is an avenue to implement CA responsibilities under the federal Clean Water Act. This act regulates discharge of waste into a water resource.

2.1.5 Clean Water Act, 1972 (CWA 33 U.S.C. 1251 et seq.)

This act regulates discharges into waters of the U.S. Army Corp of Engineers (ACOE) is given the responsibility to implement programs to prevent pollution.

2.2 Studies Required

2.2.1 Literature Search

Prior to conducting field surveys, a review of pertinent literature, regulatory requirements, special-status species lists and recorded occurrences was conducted to determine if the proposed bridge repairs are within the range of sensitive resources such as state and/or federal listed threatened and/or endangered species. Available literature was reviewed including the California Natural Diversity Database (CNDDDB) for the Yuma East and Yuma West U.S. Geological Survey (USGS) 7.5-minute Topographic Quadrangle and previous Barrett's Biological Surveys (BBS) surveys.

Survey Methodologies

Glenna Barrett, Jacob Calanno and Jeremy Scheffler performed the biological assessment surveys within and adjacent (500 foot buffer where possible) to the Biological Study Area (BSA) on November 5, 2022 and August 8 (AM/PM) and August 9, 2024.

All proposed impact areas within the BSA were visited on foot where possible.

Personnel and Survey Dates

Glenna Barrett, Jacob Calanno and Jeremy Scheffler of Barrett's Biological Surveys performed the biological assessment survey on November 5, 2022 (52-55°F, 0-25% cloud cover, 0-8 mph; 0800-0900 (3 hours on site) and Glenna Barrett on August 8 (88-93°F, 0-15% cloud cover, 4-8 mph 0730-0845), August 8 (106°F, 0% cloud cover, 8-10 mph 1730-1845), August 9 (93-94°F, 30-75% cloud cover, 7-10 mph 1730-1845(3.5 hours)). Resumes are attached.

2.2.2 Limitations That May Influence Results

Due to a wet summer-fall, rain fall was sufficient to germinate seeds and therefore, botanical specimens were present.

This area is highly disturbed by vehicles during all seasons and typical damage was observed. Also, a portion of the vegetation had been burned.

3. Results: Environmental Setting

3.1 Description of the Existing Biological and Physical Conditions

3.1.1 Biological Study Area (BSA)

This site is located within the Colorado Desert which is a subdivision of the larger Sonoran Desert and covers approximately 7 million acres. The desert encompasses Imperial County and includes parts of San Diego County, Riverside County, and a small part of San Bernardino County. This site is in Imperial County.

This desert lies at a relatively low elevation, below 1,000 feet, with the lowest point of the desert floor is 275 feet below sea level at the Salton Sea; northeast of the site. The highest peaks of the Peninsular Ranges which reach elevations of nearly 10,000 feet are to the west of the site.

The Colorado Desert's climate differs from other deserts. The region experiences greater summer daytime temperatures (up to 120°F) than higher-elevation deserts and rarely experiences frost. In addition, the Colorado Desert experiences two rainy seasons per year usually in the winter and late summer in this portion. This area is within the agricultural portion that is irrigated by Colorado River water delivered through water conveyance structures maintained by the Bureau of Reclamation, Bard Water District and Yuma County Water Users. This ~~Picacho~~ Picacho Road Bridge spans the Yuma Main Canal which carries irrigation water to local farmers.

3.1.2 Physical Conditions

The original bridge has degraded requiring replacement. If the bridge is closed, traffic will need to be detoured several miles to bypass the closed bridge.

FEMA Map Panel 06025C2275C maps the area as Zone X: Areas of 0.2% annual flood; areas of 1% annual chance flood will average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

The United States Department of Agriculture Web Soil Survey classified the approximate 2.4 acres in the project site as:

12 Holtville Clay (0.96 acres/34%)

Map Unit Setting

- *National map unit symbol:* 1sf1
- *Elevation:* 80 to 600 feet
- *Mean annual precipitation:* 5 to 10 inches

-
- *Mean annual air temperature:* 72 to 76 degrees F
 - *Frost-free period:* 250 to 325 days
 - *Farmland classification:* Prime farmland if irrigated and reclaimed of excess salts and sodium

Map Unit Composition

- *Holtville and similar soils:* 100 percent
- *Estimates are based on observations, descriptions, and transects of the mapunit.*

Description of Holtville Clay Setting

- *Landform:* Flood plains
- *Landform position (two-dimensional):* Summit
- *Landform position (three-dimensional):* Dip
- *Down-slope shape:* Linear
- *Across-slope shape:* Linear
- *Parent material:* Mixed alluvium

Typical profile

- *Ap - 0 to 13 inches:* clay
- *C1 - 13 to 23 inches:* clay
- *2C2 - 23 to 75 inches:* stratified silty clay loam

Properties and qualities

- *Slope:* 0 to 1 percent
- *Depth to restrictive feature:* More than 80 inches
- *Drainage class:* Well drained
- *Capacity of the most limiting layer to transmit water (Ksat):* Moderately low to moderately high (0.06 to 0.20 in/hr)
- *Depth to water table:* More than 80 inches
- *Frequency of flooding:* None
- *Frequency of ponding:* None
- *Calcium carbonate, maximum content:* 15 percent
- *Maximum salinity:* Very slightly saline to strongly saline (2.0 to 32.0 mmhos/cm)
- *Sodium adsorption ratio, maximum:* 13.0
- *Available water supply, 0 to 60 inches:* Very high (about 12.2 inches)

• 13—Indio silt loam, 0 to 1 percent slopes (0.25 acres/9%)

• Map Unit Setting

- *National map unit symbol:* 2tdtv
- *Elevation:* 80 to 990 feet
- *Mean annual precipitation:* 3 to 7 inches
- *Mean annual air temperature:* 72 to 74 degrees F
- *Frost-free period:* 260 to 350 days
- *Farmland classification:* Prime farmland if irrigated and reclaimed of excess salts and sodium

• Map Unit Composition

- *Indio and similar soils:* 88 percent
- *Minor components:* 12 percent

-
- *Estimates are based on observations, descriptions, and transects of the mapunit.*
 - **Description of Indio Silt Loam**
 - **Setting**
 - *Landform:* Flood plains
 - *Landform position (two-dimensional):* Summit
 - *Landform position (three-dimensional):* Talf
 - *Down-slope shape:* Linear
 - *Across-slope shape:* Linear
 - *Parent material:* Mixed stream alluvium derived from igneous, metamorphic and sedimentary rock
 - **Typical profile**
 - *Ap - 0 to 12 inches:* silt loam
 - *C - 12 to 58 inches:* stratified very fine sandy loam to silt loam
 - *2C - 58 to 60 inches:* loamy sand
 - **Properties and qualities**
 - *Slope:* 0 to 1 percent
 - *Depth to restrictive feature:* More than 80 inches
 - *Drainage class:* Well drained
 - *Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.57 to 1.98 in/hr)
 - *Depth to water table:* More than 80 inches
 - *Frequency of flooding:* Occasional, None
 - *Frequency of ponding:* None
 - *Calcium carbonate, maximum content:* 5 percent
 - *Maximum salinity:* Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)
 - *Sodium adsorption ratio, maximum:* 13.0
 - *Available water supply, 0 to 60 inches:* High (about 10.6 inches)
 - **18—Lagunita loamy sand (0.19 acres/7%)**
 - **Map Unit Setting**
 - *National map unit symbol:* 1sf7
 - *Elevation:* 80 to 600 feet
 - *Mean annual precipitation:* 5 to 10 inches
 - *Mean annual air temperature:* 72 to 76 degrees F
 - *Frost-free period:* 250 to 325 days
 - *Farmland classification:* Not prime farmland
 - **Map Unit Composition**
 - *Lagunita and similar soils:* 100 percent
 - *Estimates are based on observations, descriptions, and transects of the mapunit.*
 - **Description of Lagunita**
 - **Setting**
 - *Landform:* Alluvial fans, flood plains, drainageways, terraces
 - *Landform position (two-dimensional):* Summit
 - *Landform position (three-dimensional):* Tread, dip
 - *Down-slope shape:* Linear
 - *Across-slope shape:* Linear

- *Parent material:* Recent mixed alluvium
- **Typical profile**
 - *A - 0 to 8 inches:* loamy sand
 - *C - 8 to 60 inches:* loamy sand
- **Properties and qualities**
 - *Slope:* 0 to 1 percent
 - *Depth to restrictive feature:* More than 80 inches
 - *Drainage class:* Somewhat excessively drained
 - *Capacity of the most limiting layer to transmit water (Ksat):* High to very high (5.95 to 19.98 in/hr)
 - *Depth to water table:* More than 80 inches
 - *Frequency of flooding:* None
 - *Frequency of ponding:* None
 - *Calcium carbonate, maximum content:* 5 percent
 - *Maximum salinity:* Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)
 - *Sodium adsorption ratio, maximum:* 30.0
 - *Available water supply, 0 to 60 inches:* Low (about 3.9 inches)

The area has 0.22 acres of water (8%) within a canal and 1.18 (42%) acres of right of way.

The area contains 1.21 acres of ground that would be considered prime farmground if irrigated and reclaimed of excess salts 0.19 acres of not prime farmground. The vegetation community found in these areas is ruderal vegetation such as saltcedar, Russian thistle and saltbush.

3.1.3 Biological Conditions in the Study Area

The top of the bridge is asphalt, heavily traveled and is not biologically sensitive. Areas within the BSA included ruderal vegetation. Underneath the bridge, within the Yuma Main Canal, sparse vegetation was observed. Approximately 0.93 acres were burned northeast of bridge with in the BSA. An agricultural crop of lettuce was observed to the north of the site in 2022. Currently the field is disked prior to planting. Tables 1 and 2 (below) list species observations within the buffer zone of the site.

Table 1: Vegetation Found in On Site or Vicinity (2022 and 2024)

Common name	Scientific name	Cal-IPC Rating*	Year Observed
Arrowweed	<i>Pluchea sericea</i>	None	2022/2024
Desert shaggy mane	<i>Podaxis pistillaris</i>	None	2022
Desert mallow	<i>Sphaeralcea ambigua</i>	None	2022
Mesquite	<i>Prosopis glandulosa</i>	None	2022/2024
Palm trees	<i>Washingtonia spp.</i>	None	2022
Palo verde	<i>Parkinsonia floridum</i>	None	2022/2024
Pigweed	<i>Chenopodium sp.</i>	None	2022
Russian thistle	<i>Salsola tragus</i>	Ca Noxious Weed Cal-IPC rating: Limited*	2022/2024

Common name	Scientific name	Cal-IPC Rating*	Year Observed
Saltbush	<i>Atriplex spp.</i>	None	2022/2024
Saltcedar	<i>Tamarix sp.</i>	Ca Noxious Weed Cal-IPC rating: High *	2022/2024
Spanish needle	<i>Palafoxia arida</i>	None	2022

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

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

No vegetation was found that would be considered endangered, threatened or species of concern.

Table 2: Animals/Insects Found in Onsite or Vicinity

Common Name	Scientific Name	Year	Location
Aberts Towhee	<i>Melozone aberti</i>	2024	Onsite
Barn swallows	<i>Hirundo rustica</i>	2022	Offsite
Black phoebe	<i>Sayornis nigricans</i>	2022	Offsite
Black tailed gnatcatcher	<i>Poliophtila melanura</i>	2024	Offsite
Eurasian collared dove	<i>Streptopelia decaocto</i>	2024	Onsite
Great tailed Grackle	<i>Quiscalus mexicanus</i>	2022	Onsite
House Finch	<i>Haemorhous mexicanus</i>	2024	Onsite
Mourning dove	<i>Zenaida macroura</i>	2024	Onsite

No animals were found onsite that would be considered endangered, threatened or species of concern. Bank swallows were observed in the buffer zone; no nests were observed on site. No swallows or bats were observed nesting under the bridge.

Habitat Connectivity

The habitat is divided by Picacho Road (S24) which runs from I-8 to Bard, CA. Picacho Road can be accessed by wildlife. This project will not change the existing connectivity.

3.2 Regional Species and Habitats/Natural Communities of Concern

3.2.1 Habitat/Natural Communities of Special Concern

There are no Habitat/Natural Communities of Special Concern found within the BSA.

Table 3: Vegetative Communities

Parcels	Acreage	Description	Vegetative Communities
Not known	2. 4	Weeds, invasive species (saltcedar)	Ruderal

3.2.2 Special-Status Plant Species

Appendix: Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle, November, 2022 and August, 2024 (attached) listed 10 botanical species within the Quadrangle searched. None would be expected within the BSA.

3.2.3 Special-Status Animal Species

Appendix: Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle November, 2022 and August, 2024 (attached) listed 37 zoological species within the Quadrangles searched. Of these, five species: black-tailed gnatcatcher (*Poliophtila melanura*) were observed offsite; no appropriate nesting habitat was observed. Burrowing owl could be expected outside the ESA but were not observed during survey. Gila woodpeckers could be found roosting or nesting in palm trees present off site and out of the ESA. Bank swallows or Yuma ridgeway's rail would not be expected; no habitat was observed.

4. Results: Biological Resources, Discussion of Impacts & Mitigations

4.1 Habitats/Natural Communities of Special Concern

There are no habitats/Natural Communities of Special Concern.

4.2 Special-Status Plant Species

No special-status plant species are expected as there is no habitat to support them.

4.2.1 Discussion of Plant Species

Survey Results

No special species observed within the BSA during survey. Vegetation observed was mostly ruderal or invasive (saltcedar and Russian thistle) and would be expected to grow back rapidly if disturbed.

Project Impacts

None are expected.

Avoidance and Minimization Efforts/Compensatory Mitigation

A preconstruction burrowing owl and nesting bird survey should be conducted by a qualified biologist. These survey dates will vary and will be determined by species found. Most generally, raptor surveys will be between Jan and July; nesting birds and burrowing owls between February and August.

4.3 Special-Status Animal Species

Bank Swallow (*Riparia riparia*) listed as CDFW Threatened. Sexes similar in appearance, and plumage similar throughout year. Adult has grayish brown mantle, rump, and wing coverts, contrasting with darker brown remiges and rectrices; tertials entirely brown or brown with pale edgings; throat white, contrasting with distinct brown breast-band and grayish brown crown. Brown breast-band can extend to belly as sharp spike. Juveniles (hatch-year birds) are distinguished from adults by buff-edged or whitish upperparts, and buffy pink wash to throat. Slight notch in the medium-length tail is visible in the hand and while bird is perched. No sexual dimorphism; sexes are reliably distinguished by presence or absence of brood patch or cloacal protuberance. Presently breeds primarily in lowland areas along ocean coasts, rivers, streams, lakes, reservoirs, and wetlands (Cramp 1988, Turner and Rose 1989a, Am. Ornithol. Union American Ornithologists' Union 1998a). Vertical banks, cliffs, and bluffs in alluvial, friable soils characterize nesting-colony sites throughout North America. Nesting colonies also found in artificial sites such as sand and gravel quarries and road cuts. Historically, all colonies in North America were found in natural sites such as banks along rivers, streams, lakes, and coasts; today, many colonies are in human-made sites. Breeding habitat ephemeral; suitability of sites depends on erosion, which both creates new sites and destroys established ones. Also, prefers new, fresh banks without old burrows. Takes flying or jumping insects almost exclusively on the wing. Occasionally eats terrestrial and aquatic insects or larvae. Diet varies within and between years and sites, depending on local availability of insects. Rare consumption of vegetable matter appears to be accidental. Seen offsite; none observed in canal bank.

Black-tailed Gnatcatcher (*Poliophtila melanura*) is a California Watch List species (CDFW Watch List Species: Watch list species are taxa that were previously SSCs but do not currently meet SSC criteria, and for which there is concern and a need for additional information to clarify status.). Small, long-tailed songbird similar in size to other gnatcatchers. Adult male, about 108 mm total length, 5.3 g mass; female, about 97 mm length, 5 g. Sexually dimorphic in coloration. Adult male in breeding (Alternate) plumage distinguished by long, black, graduated tail, with outer web and terminal portion of inner webs of outermost 2 rectrices white (third outermost rectrix often tipped white); glossy bluish-black cap extending down to upper edge of lores and auriculars; white eye-ring (upper half less distinct in eastern [*P. m. melanura*] populations); deep neutral gray to deep slate gray or brownish upperparts; and grayish-white underparts. Breeding female lacks dark cap and has more brownish greater wing coverts, back, and rump than male does. In winter (Basic) plumage, both sexes have paler upperparts and male lacks black cap but has dark streak over eye. Habitat: honey mesquite, honey-screwbean mesquite, and screwbean mesquite-salt cedar along lower Colorado River, Yuma Co., AZ, plant species with higher proportion of foliage used more often. Additionally, average foraging height corresponded directly to foliage volume. In Yuma Co., seasonal shift in foraging behavior and substrate also corresponded to foliage volume. Observed offsite; no nests observed onsite.

Burrowing Owl (*Athene cunicularia*) is considered a California Department of Fish and Wildlife: Species of Special Concern. They are small raptors that nest in burrows that have been borrowed from other species or by the raptor in open grassland areas and water conveyance structures in Imperial County. Have adapted well in Imperial County using canals/drains/ditches to establish

burrows and foraging for insects in agricultural fields. Owls/burrows not found on site but could be found outside of BSA.

Gila Woodpecker (*Melanerpes uropygialis*) is listed as Federally and CDFW Endangered. Appearance: Bill black to grayish black with dark red to reddish hazel eyes. About 9.3 inches long with brownish green or bluish legs and feet. Black and white barring on back male has red cap on head. Buff-brown face, neck and breast with barred rump and central tail feathers. Habitat: Uncommon to resident in southern California along the Colorado River, and locally near Brawley. Occurs mostly in desert riparian and desert wash habitats. Cottonwoods and other desert riparian trees, shade trees, and date palms supply cover. None observed or heard; palm trees or other trees to roost or nest are available.

Yuma Ridgway's Rail (*Rallus obsoletus yumanensis*) is 15-16" (38-41 cm). Chicken-sized with a long, thin bill. Mostly olive brown on crown and back, warm cinnamon on face and breast, with gray and white barring on flanks. Juvenile is darker and duller. Typically secretive and rarely seen, most usually know the bird is around when it vocalizes and letting off a repetitive, sharp clapping. The Yuma race is a species found in the marshes of the lower Colorado River, the Salton Sea in California, the Ciénega de Santa Clara in Mexico, and the Gila River in Arizona. They prefer younger stands of cattail and bulrush, and eat crayfish, freshwater clams, and other invertebrates. California and federally endangered species. No cattails, dense vegetation or marshes for habitat found onsite.

4.3.1 Discussion of Animal Species

Survey Results

Burrowing owl, Gila woodpecker, or Yuma Ridgeway Rail, were not found within the BSA during the survey. No swallows or bats were observed nesting under bridge. Bank swallows were observed in 2022 offsite as were black-tailed gnatcatcher in 2024.

Project Impacts

No impacts are expected with avoidance and minimization efforts.

Avoidance and Minimization Efforts/Compensatory Mitigation

1. Nesting surveys by qualified biologists during nesting season (generally February through August); preferably time construction during non nesting season (generally September through January). Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at start of ground breaking activities
2. Any invasive plant should be removed in a manner that will not spread seeds or root material. All equipment will be cleaned prior to being onsite.
3. Worker environmental awareness training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW) and invasive plants which will include the following aspects:

- Biology and status
- Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas;
- Reporting procedures to be used if a species is encountered in the field; and driving procedures and techniques, for commuting, and driving on, to the project site
- Identification of nesting birds and procedures to follow if nesting is suspected.

3. Areas outside of the project footprint will be designated as an “Environmentally Sensitive Area” (ESA) on project plans. No project-related activities will take place within the ESA-designated areas.

5. Conclusions & Regulatory Determination

5.1 Agency Coordination

There are no proposed permanent or temporary impacts to the Yuma Main Canal as a result of the project. The proposed bridge work will occur outside of the active channel and, thus, will not require permits from the California Department of Fish and Wildlife. The Yuma Main Canal, which is a man-made structure built wholly in uplands, is not within the jurisdiction of the U.S. Army Corps of Engineers and the California Regional Water Quality Control Board.

The original bridge pylons will be removed by crane; best management practices will be employed to minimize removal impacts and will not alter the streambed or employ dredging activities.

Table 4: Expected Impacts

Area	Endangered/threatened/ Species of Concern Habitat	Riparian Habitat	Wetlands	Wildlife Corridors	Local Ordinances	Waters of the U.S.
2.4 acres	None with avoidance/minimization/mitigation measures listed	No	No	No	No	No

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7. Appendix

Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma Quadrangle (Nine Quad Search) November, 2022 and August, 2024

Biological Study Area Map

Photographs

FEMA map

Engineering Plans

Qualifications

SENSITIVE BOTANICAL AND
ZOOLOGICAL SPECIES
(CNDDB/CNPS) SPECIES

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**Yuma East and West Nine Quad
November 2022/August 2024**

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
American badger	Taxidea taxus	SSC	Burrowing animals that feed on ground squirrels, rabbits, gophers and other small animals. Prefer grasslands, agricultural areas.	Found in drier open areas with friable soils	None seen; no burrows observed with badger characteristics. Not expected because of farming activities
Arizona Bells vireo	Vireo bellii arizonae	Endangered	V.b. arizonae is a small 4.0-4.75 inch (10-12 cm) bird with drab gray-green plumage above and white to yellow plumage below, with sides and flanks faintly washed with grayish olive-yellow. This bird has a white-eye ring and two pale wing bars, with the lower bar being prominent. The feet and bill are bluish-gray. It has a thickened bill, heavy legs and dark eyes.	Inhabits lowland riparian areas, with willows, mesquite and seepwillows. The vireo prefers dense, low, shrubby vegetation in riparian areas. Below 1066m (3500 ft). Lower sonoran zone in desert riparian communities.	No riparian communities
Arizona Myotis	Myotis occultus	SSC	Medium sized Myotis (total length = 80.0-97.0 mm [3.2-3.88 in.] and forearm length = 36.0-41.0 mm [1.44-1.64 in.]) with sleek glossy fur. Small ears (11.0-16.0 mm [0.44-0.64 in.]) and large feet (8.0-11.0 mm [0.32-0.44 in.]) are characteristic. Long hairs occur on the toes and extend beyond the tips of the claws. Color often bright, generally tawny, ochraceous, pale tan, or reddish-brown to dark brown. It is the only long-footed (i.e. hind foot length >8.0 mm [0.32 in.]) Myotis in Arizona with a gradually sloping forehead and the only Myotis in Arizona with only 1 small upper premolar behind the canine. In the rare individual with 2, it is on 1 side only or 1 is crowded out of alignment.	In summer in Arizona it is usually found in ponderosa pine and oak-pine woodland near water. However, it is also found along permanent water or in riparian forest in some desert areas such as along the lower Colorado and Verde rivers. In New Mexico it is considered to be resident around large permanent bodies of water and transient elsewhere. Vegetation zone is not thought to be an important influence there.	None observed under bridge; no roosting or nesting habitat

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ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
banded Gila monster	<i>Heloderma suspectum cinctum</i>	SSC	It has a stocky body with a large head and a short, fat tail. The skin consists of many round, bony scales, a feature that was common amongst the dinosaurs but is unusual in today's reptiles. Gila monsters have a striking bright pink and black coloration	They inhabit scrubland, succulent desert, and oak woodland, seeking shelter in burrows, thickets, and under rocks in locations with ready access to moisture.	No habitat
Burrowing Owl	<i>Athene cunicularia</i>	CDFG: SC Species of Concern	Small raptors that nest in burrows that have been borrowed from other species in open grassland areas. Have adapted well in Imperial County using canals/drains/ditches to establish burrows and foraging for insects in agricultural fields	Open, dry annual or perennial grasslands; deserts & scrublands	No owls or burrows found on site. Could be found around adjacent agricultural fields
California leaf-nosed bat	<i>Macrotus californicus</i>	SSC	The California leaf-nosed bat weighs between 12 and 20 grams, has a wingspan of over 30 centimeters and a body length of over 6 centimeters, and is brown in color. As its name implies, it has a triangular fleshy growth of skin, called a noseleaf, protruding above the nose	California leaf-nosed bats can be found in Sonoran and Mojave Desert scrub habitats in the Colorado River valley in southern California, Nevada and Arizona, and throughout western Mexico. It is non-migratory and does not hibernate.	No caves or abandoned mines in adjacent habitat; not expected.
Colorado Desert fringe-toed lizard	<i>Uma notata</i>	SSC	2 3/4 to 4 4/5 inches long from snout to vent (7 - 12.2 cm). (Stebbins 2003) The tail is about the same length as the body. Color is white, with a contrasting pattern of broken black lengthwise lines and round, eye-like spots	Sparsely-vegetated arid areas with fine wind-blown sand, including dunes, flats with sandy hummocks formed around the bases of vegetation, washes, and the banks of rivers. Needs fine, loose sand for burrowing.	No riparian communities, none expected
Colorado pikeminnow	<i>Ptychocheilus lucius</i>	State and federally endangered	It has an elongated body reminiscent of the pike. The cone-shaped and somewhat flattened head is elongated, forming nearly a quarter of the body length. Color grades from bright olive green on the back to a paler yellowish shade on the flanks, to white underneath. Young fish also have a dark spot on the caudal fin. Both the dorsal and anal fins typically have nine rays. The pharyngeal teeth are long and hooked	Their usual habitat is the backwaters of the turbulent and turbid rivers that make up the Colorado system.	No habitat; not part of the Colorado River; not expected

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
Crissal thrasher	Toxostoma crissale	SSC	A large thrasher found in the Southwestern United States to central Mexico. The bird grows to 32 cm (12.5 inches), and has a deeply curved bill. It can be found near water in dense underbrush, and in the low desert near canyon chaparral; seldom flies in the open.	Dense vegetation along streams/washes in mesquite/ willows/arrowweed	No habitat; not expected
desert tortoise	Gopherus agassizii	state and federally threatened	The head of a desert tortoise is scaly, and the body has thick skin. Desert tortoises also have extremely long nails, which are used in digging through the desert sand to find shelter. The upper shell of a desert tortoise ranges in length from 15 to 36 centimeters, and its color varies from dull brown to a dull yellow.	Desert tortoises live in different habitats in different parts of their range. In the south, (northern Sinaloa and southern Sonora) they inhabit thornscrub and tropical deciduous forests, further north, this habitat gives way to foothills thornscrub and Sonoran desertscrub, and in the northernmost part of their range (California, Nevada, and Utah), Mohave desertscrub.	No habitat; not expected
elf owl	Micrathene whitneyi	Endangered	is a small grayish-brown owl about the size of a sparrow. It has pale yellow eyes highlighted by thin white "eyebrows" and a gray bill with a horn-colored tip.	found in the Southwestern United States, central Mexico, and the Baja California peninsula. The elf owl frequently inhabits woodpecker holes in saguaro cacti; it also nests in natural tree cavities.	No habitat; not expected
flat-tailed horned lizard	Phrynosoma mcallii	SSC	Closely related to Desert horned lizard (scat indistinguishable); only found in Imperial, Riverside County, Ca and Yuma area, Az. Small round lizard with distinguishing round spots on back. Diet of ants; needs sandy soil, shade bushes to survive.	Desert washes/sandy areas with vegetative cover. Diet of ants	No habitat; not expected
Gila woodpecker	Melanerpes uropygialis	Endangered	Bill black to grayish black with dark red to reddish hazel eyes. About 9.3 inches long with brownish green or bluish legs and feet. Black and white barring on back male has red cap on head. Buff-brown face, neck and breast with barred rump and central tail feathers.	Uncommon to resident in southern California along the Colorado River, and locally near Brawley. Occurs mostly in desert riparian and desert wash habitats. Cottonwoods and other desert riparian trees, shade trees, and date palms supply cover.	No habitat; not expected

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
gilded flicker	Colaptes chrysoides	Endangered	Golden-yellow underwings distinguish the gilded flicker from the northern flicker found within the same region, which has red underwings. It is a large-sized woodpecker (mean length of 29 cm (11 in)).	of the Sonoran, Yuma, and eastern Colorado Desert regions of the southwestern United States and northwestern Mexico, including all of Baja California, except the extreme northwestern region.	No habitat; not expected
Le Contes thrasher	Toxostoma lecontei	SSC	A large songbird with a very long tail and a very long, curved bill. It has short, rounded wings and long, strong legs	LeConte's thrasher is a pale bird found in the southwestern United States and northwestern Mexico. It prefers to live in deserts with very little vegetation, where it blends in with the sandy soils.	No habitat; not expected
least bittern	Ixobrychus exilis	SSC	is a small heron, the smallest member of the family Ardeidae. Least bitterns are a small secretive marsh bird averaging 11 - 14 inches (28-36cm) in length with a wingspan of 16 - 18 inches (41-46cm).	Found in the Americas. Nests are shallow cups woven of dead cattails, bulrushes, or occasionally twigs and may have nearby vegetation bent overhead giving it the appearance of a handbasket. Nests are placed in tall, dense stands of emergent vegetation over water 4-30 inches deep (10 - 75 cm) and are typically only a few meters from a nearby opening.	No habitat; not expected
loggerhead shrike	Lanius ludovicianus	SSC	Loggerhead Shrikes are thick bodied songbirds. They have large, blocky heads and a thick bill with a small hook. The tail is fairly long and rounded.	Open country with scattered shrubs and trees is the typical habitat of Loggerhead Shrike, but the species can also be found in more heavily wooded habitats with large openings and in very short habitats with few or no trees.	Could be observed passing through area; sparse prey opportunities on site
lowland leopard frog	Lithobates yavapaiensis	SSC	Tan, gray-brown or light gray green to green above; yellow below. Vague upper lip stripe, tuberculate skin. Dark network on rear of thighs; yellow groin color often extends onto rear of belly and underside of legs. Male will exhibit a swollen and darkened thumb base	Find in desert grassland and in woodlands. Uses permanent water sources, stays near water. Breed Feb-April. Bullfrogs are predators	Extirpated in most areas because of presence of bullfrogs. Not expected
Lucys warbler	Leiothlypis luciae	SSC	The species' gray plumage is highlighted with rich cinnamon on the crown and rump. Lucy's Warblers nest in tree cavities—one of only two warbler species that do so (the other is the Prothonotary Warbler of the Southeast)	Lucy's Warbler nests in the driest habitat of any U.S. or Canada warbler: the mesquite bosques and riparian washes of the Desert Southwest. These scattered stands offer shade and insects, and Lucy's Warbler pairs may nest almost on top of each other when they find good patches of habitat.	No habitat; not expected

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
olive-sided flycatcher	Contopus cooperi	SSC	This husky, barrel-chested flycatcher is the largest of the pewees, with heavy grayish markings on the sides as if the bird is wearing a waistcoat.	The Olive-sided Flycatcher whistles an instantly recognizable quick, three beers! across its rugged habitat of coniferous mountain forests, bogs, and muskeg.	No habitat; not expected
pallid bat	Antrozous pallidus	SSC	Antrozous pallidus is a large (forearm 48?60 mm), pale bat with large ears, blunt snout (with ridge across the top), and a distinctive skunk?like odor. Pallid bats are gregarious, and often roost in colonies of between 20 and several hundred individuals	Pallid bats are typically found in arid or semi-arid habitats, often in mountainous or rocky areas near water. They are also found over open, sparsely vegetated grasslands.	No roosting habitat; may hunt over water; not expected to roost on site
razorback sucker	Xyrauchen texanus	State and federally endangered	One of the largest suckers in North America can grow to up to 13 pounds and lengths exceeding 3 feet. The razorback is brownish-green with a yellow to white-colored belly and has an abrupt, bony hump on its back shaped like an upside-down boat keel	Colorado River	No habitat; not expected
Sonoran Desert toad	Incilius alvarius	SSC	Large: 7.5 inches or more in length. Smooth, typically olive-green/brown skin, cranial crests, and prominent, elongated glands on both sides of the back of the head (parotoid glands) and on the hind legs. Young toads have small dark, orange-tipped spots on the back. Larger tadpoles are gray or brown with a rounded tail tip, and grow to about 2.25 inches	Sonoran Desert scrub, semi-desert grasslands. Can be tied to permanent water, such as major rivers or the edges of agriculture. May be found many miles from water, particularly during the summer monsoons. Can be found in rodent burrows or underground retreats.	Habitat not favorable; no rodent or burrows available on site
Sonoran mud turtle	Kinosternon sonoriense	SSC	Mud turtles lack an entoplastron (the near-circular plastral bone located along the midline, in between the forelimbs, and in between the epiplastra and hypoplastra). The kinosternid carapace is normally domed	ranges from north temperate to tropical habitats, and from rain forest to grasslands to desert. It includes totally aquatic to semi-terrestrial species,	Not seen; not expected water swift

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
Sonoran yellow warbler	Setophaga petechia sonorana	SSC	In summer, the buttery yellow males sing their sweet whistled song from willows, wet thickets, and roadsides across almost all of North America. The females and immatures aren't as bright, and lack the male's rich chestnut streaking, but their overall warm yellow tones, unmarked faces, and prominent black eyes help pick them out	Listen for Yellow Warblers singing when you're in wet woods, thickets, or streamsides—they're one of the most commonly heard warblers in spring and summer.	No habitat; not expected
southwestern willow flycatcher	Empidonax traillii extimus	State and federally endangered	Small; usually a little less than 6 inches in length, including tail. Conspicuous light-colored wingbars. Lacks the conspicuous pale eye-ring of many similar Empidonax species. Overall, body brownish-olive to gray-green above. Throat whitish, breast pale olive, and belly yellowish. Bill relatively large; lower mandible completely pale. The breeding range of extimus includes Arizona and adjacent states.	At low elevations, breeds principally in dense willow, cottonwood, and tamarisk thickets and in woodlands, along streams and rivers. Migrants may occur more widely. Prefers riparian willow/cottonwood but will use salt cedar thickets	No habitat; not expected
summer tanager	Piranga rubra	SSC	The only completely red bird in North America, the strawberry-colored male Summer Tanager is an eye-catching sight against the green leaves of the forest canopy. The mustard-yellow female is harder to spot, though both sexes have a very distinctive chuckling call note.	Look for them in open woodlands (particularly of oaks and other deciduous trees) where they are usually in the mid-canopy and above.	No habitat; not expected
Townsend's big-eared bat	Corynorhinus townsendii	SSC	Townsend's big-eared bats are medium-sized bats with broad wings. They have two large, fleshy glands on either side of the muzzle. The snout is short with elongated nostril slits. Coloration varies from population to population, although all fur colors tend to be some hue of brown or gray	Their most typical habitat is arid western desert scrub and pine forest regions. These agile fliers venture out to forage only after dark, using their keen echolocation to hunt moths and other insects. In the spring and summer, females form maternity colonies in mines, caves, or buildings.	No roosting habitat; may hunt over water; not expected to roost on site

ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
Vauxs swift	Chaetura vauxi	SSC	An aerialist of western forests, Vaux's Swift is a dark, tiny-bodied, narrow-winged bird much like the Chimney Swift of the eastern U.S. They spend most of the day in the air, taking small insects and spiders in rapid, twisting flight. They roost and even nest communally in hollow trees in mature evergreen forests (less often in chimneys).	Found in areas rich in flying insects, including forest openings, edges of waterways, and over burned areas.	Could be found foraging in areas adjacent to site during migration.
vermillion flycatcher	Pyrocephalus rubinus	SSC	Length: 5 inches The adult male has a Bright red cap, throat and underparts; with a Black eyeline, nape, back, wings, and tail The Immature male similar to female but has variable amount of red on underparts. The female and immature has Brown upperparts with White underparts with faint streaks on breast with an undertail coverts tinged pink The adult male Vermilion Flycatcher is very distinctive. The female and immatures are more nondescript but the streaking on the breast and pink tinge to the undertail coverts distinguish them from other flycatchers.	Frequents streams and ponds in arid areas; agricultural areas	Could be found foraging in areas adjacent to site; not expected onsite
western yellow-billed cuckoo	Coccyzus americanus occidentalis	Threatened and Endangered	Medium-sized cuckoo with gray-brown upperparts and white underparts. Eye-rings are pale yellow. Bill is mostly yellow. Wings are gray-brown with rufous primaries. Tail is long and has white-spotted black edges. Sexes are similar	Found in forest and open woodlands, especially in areas with dense undergrowth, such as parks, riparian woodlands, and thickets	No habitat; not expected
yellow warbler	Setophaga petechia	SSC	In summer, the buttery yellow males sing their sweet whistled song from willows, wet thickets, and roadsides across almost all of North America. The females and immatures aren't as bright, and lack the male's rich chestnut streaking, but their overall warm yellow tones, unmarked faces, and prominent black eyes help pick them out	Spend the breeding season in thickets and other disturbed or regrowing habitats, particularly along streams and wetlands. Found among willows but also live in the West where they may occur up to about 9,000 feet elevation. On their wintering grounds Yellow Warblers live in mangrove forests, dry scrub, marshes, and forests, typically in lowlands but occasionally up to 8,500 feet elevation.	Could be found foraging in areas adjacent to site; not expected onsite

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ZOOLOGICAL SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
yellow-breasted chat	Icteria virens	SSC	Yellow-breasted Chats are noticeably larger than all other warblers, reaching a length of 7.5 in (19 cm) and a wingspan of 9.75 in (24.8 cm). These birds have olive upperparts with white bellies and yellow throats and breasts; they also have long tails, thick heavy bills, large white eye-rings, and dark legs	The breeding habitats of this species are dense, brushy areas and hedgerows. The nests of these birds are cup-shaped, and are placed in thick shrubs. These birds eat insects and berries, and will forage in dense vegetation, occasionally gripping food with their feet.	No habitat; not expected
yellow-headed blackbird	Xanthocephalus xanthocephalus	SSC	Large, black, with a yellow head, a white patch on black wings; and a call that sounds like a rusty farm gate opening.	Perch out of view in cattails or reeds	No habitat, no cattails or reeds; not expected
Yuma hispid cotton rat	Sigmodon hispidus eremicus	SSC	A subspecies of Sigmodon hispidus of large size, long tail and hind feet, large skull, dorsum, including head, pale; sides pale ochraceous" (Hoffmeister 1986). Head and body 5"-8" (127-203mm). Tail 3.5"-6" (81-152mm). Weight 4-7oz. Skull has 16 teeth. 8-10 mammae.	Dense grassy areas such as fields and along roadside edges, brushy or weedy areas among weeds and cattails along the Colorado River and streams or ponds, in irrigated fields, and desert scrub (AGFD 1988).	No habitat; not expected
Yuma Ridgways rail	Rallus obsoletus yumanensis	Threatened and Endangered	A chickenlike marsh bird with a long, slightly drooping bill and an often upturned tail. Light brownish with dark streaks above. Rust-colored breast; bold, vertical gray and white bars on the flanks; white undertail coverts. Very shy.	Lives in freshwater and brackish marshes. Prefers dense cattails, bulrushes, and other aquatic vegetation. Nests in riverine wetlands near upland, in shallow sites dominated by mature vegetation, often in the base of a shrub. Prefers denser cover in winter than in summer.	No habitat, no cattails or reeds; not expected
Yuma ringtail	Bassariscus astutus yumanensis	FP	Small cat like animal	Ringtails utilize a variety of habitats. They prefer habitats with rocky outcroppings, canyons, or talus slopes and can be found in semi-arid country, deserts, chaparral, oak woodlands, pinyon pine woodlands, juniper woodlands and montane conifer forests	No habitat; not expected

PLANT SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
giant spanish-needle	<i>Palafoxia arida</i> var. <i>gigantea</i>	CNPS 1B.2	The erect, slender stem grows 30–60 cm tall, branching in the lower half and is sparsely leaved. It is glandular and hairy on the upper parts. The glabrous, glandular leaves are lanceolate, 3–20 mm wide and 4–7.5 cm long, and are arranged alternately.	These are drought-tolerant, annual herbs growing on sandy plains, dunes, deserts (Mojave desert, Sonoran desert) and rangeland, native to North America and Mexico	No habitat; not expected
Eliassons woolly tidestromia	<i>Tidestromia eliassoniana</i>	2B.2	annual or subshrub perennial plants native to desert and semi-arid regions of the western United States, Mexico and tropical America	desert habitat	No habitat; not expected
saguaro	<i>Carnegiea gigantea</i>	2B.2	a tree-like cactus species in the monotypic genus <i>Carnegiea</i> that can grow to be over 12 meters (40 feet) tall. The saguaro is a columnar cactus that grows notable branches, usually referred to as arms. Over 50 arms may grow on one plant, with one specimen having 78 arms.	It is native to the Sonoran Desert in Arizona, the Mexican state of Sonora, and the Whipple Mountains and Imperial County areas of California.	No habitat; not expected
Wiggins croton	<i>Croton wigginsii</i>	2B.2	shrub approaches a meter-3 feet in height. Its sparse foliage is made up of long oval-shaped leaves covered in a coating of white hairs. It is dioecious, with male plants bearing staminate flowers with thready stamens and female plants bearing pistillate flowers composed of the rounded immature fruits	native to California, and also found in Baja California; Sonora, Mexico and Arizona Sand dunes	No habitat; not expected
Harwoods milk-vetch	<i>Astragalus insularis</i> var. <i>harwoodii</i>	2B.2	Annual; +- gray strigose. Stem: decumbent to ascending, 5–40 cm, slender. Leaf: 2–12 cm; leaflets (9)11–19(21), +- spaced, 4–20 mm, +- narrowly elliptic or oblong, tips generally notched. Inflorescence: among leaves; flowers 4–9, spaced, early spreading, then reflexed.	Sandy or gravelly areas; Elevation: < 500 m.	No habitat; not expected

PLANT SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
narrow-leaf sandpaper-plant	<i>Petalonyx linearis</i>	2B.3	Plant 15--100 cm. Leaf: generally sessile, 10--25 mm, linear to narrowly (ob)lanceolate, obtuse to acute, entire to irregularly toothed. Inflorescence: 4--10 cm; outer bract 5--8 mm, ovate to +- round; inner bracts 3--4 mm, ovate, +- cordate, acute to notched, lobed; pedicels 1--2 mm. Flower: petals 2--5.5 mm, free, white; stamens 3--7 mm, +- exserted; style +- 3-6 mm	Sandy or rocky canyons, generally in creosote-bush scrub; Elevation: < 1000 m.	No habitat; not expected
mud nama	<i>Nama stenocarpa</i>	2B.2	Plant short-soft-silky-hairy and short-glandular-hairy; some hairs stiff, swollen at base. Stem: prostrate to ascending, 8--40 cm, branches many. Leaf: petiole 0(3) mm; 5--30 mm, oblanceolate, oblong, or spoon-shaped, base generally +- clasping stem, margins wavy, generally +- rolled under.	marshes and swampy valley wetlands Intermittently wet areas; Elevation: < 810 m.	No habitat; not expected
desert beardtongue	<i>Penstemon pseudospectabilis</i> ssp. <i>pseudospectabilis</i>	2B.2	The plant is generally a shrub growing to a maximum height of one meter, with many erect stems. The thin leaves are roughly oval with wide pointed tips and serrated edges. They are arranged oppositely in pairs and many pairs are completely fused at the bases about the stem, forming a disc.	Native to hot, arid locations; Gravelly or rocky places, usually mountain or high desert	No habitat; not expected

PLANT SPECIES		STATUS ¹	DESCRIPTION OF SPECIES	HABITAT	OBSERVATION/ SITE POTENTIAL
Arizona cottontop	<i>Digitaria californica</i> var. <i>californica</i>	2B.3	Cespitose perennial herb. Stem: generally erect, 40--100 cm. Leaf: sheath glabrous or long-hairy; ligule 1--6 mm, entire or ragged; blade generally 2--12 cm, 2--5 mm wide, glabrous to tomentose. Inflorescence: panicle-like with 4--10 appressed to ascending 1° branches (2° branches occasionally present); spikelets paired, unequally stalked. Spikelet: 3--4 mm (except hairs), lanceolate; lower glume 0.4--0.6 mm, translucent, veinless; upper glume 2.5--5.1 mm, 3-veined; lemma 2.5--5 mm, 3-5(7)-veined; upper glume, lower lemma densely hairy, hairs 1.5--5 mm, white to purple.	Rocky hillsides; Elevation: < 1500 m.	No habitat; not expected
roughstalk witch grass	<i>Panicum hirticaule</i> ssp. <i>hirticaule</i>	2B.1	Annual. Stem: 1--8 dm. Leaf: sheath 2--6 cm, axis glabrous to short-hairy; ligule membrane 0.5--2 mm, ciliate; blade 7--20 cm, 3--15 mm wide, upper surface generally sparsely short-hairy. Inflorescence: 5--20 cm, open; 1° branches 3--8 cm, glabrous; spikelets 1--2 per node, stalk 0.5--3 mm, generally appressed. Spikelet: +- 2.5--3 mm, +- 1 mm wide, lanceolate to ovate, green; axis between glumes and florets visible; lower glume + 1.5--2.5 mm, generally 5-veined, acute; lower floret sterile, lemma 7-veined, acuminate to acute, palea generally < lemma; upper floret 0.7--0.8 x lower floret, stipitate, with paired crescent-shaped scars, often enlarged.	Ecology: Sandy soils, open sites, creosote-bush scrub; Elevation: < 1400 m. Bioregional Distribution: D; Distribution Outside California: to Texas, South America. Flowering Time: Aug--Dec	No habitat; not expected

CNPS Species or Community Level	
G1 = Less than 6 viable element occurrences (EOs) OR less than 1,000 individuals OR less than 2,000 acres.	
G2 = 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres.	
G3 = 21-80 EOs OR 3,000-10,000 individuals OR 10,000-50,000 acres.	
G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat.	
G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.	
State Ranking	
The state rank (S-rank) is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the S-rank.	The R-E-D Code contains information on Rarity, Endangerment, and Distribution, ranked as a 1, 2, or 3 for each value (as below). This code was originally known as the R-E-V-D Code (through the 3rd edition 1980), and the V (Vigor) was removed in the 4th edition (1984).
S1 = Less than 6 EOs OR less than 1,000 individuals OR less than 2,000 acres	R - Rarity
S1.1 = very threatened	1 – Rare, but found in sufficient numbers and distributed widely enough that the potential for extinction is low at this time
S1.2 = threatened	2 – Distributed in a limited number of occurrences, occasionally more if each occurrence is small
S1.3 = no current threats known	3 – Distributed in one to several highly restricted occurrences, or present in such small numbers that it is seldom reported
S2 = 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres	E - Endangerment
S2.1 = very threatened	1 – Not very endangered in California
S2.2 = threatened	2 – Fairly endangered in California
S2.3 = no current threats known	3 – Seriously endangered in California
S3 = 21-80 EOs or 3,000-10,000 individuals OR 10,000-50,000 acres	D - Distribution
S3.1 = very threatened	1 – More or less widespread outside California
S3.2 = threatened	2 – Rare outside California
S3.3 = no current threats known	3 – Endemic to California
S4 = Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat. NO THREAT RANK.	
S5 = Demonstrably secure to ineradicable in California. NO THREAT RANK.	

Sources: CDFW/CNDDDB 2022/4, California Wildlife 2022/4; CNPS 2022/4; USFWS, 2022/4

State/CDFW:

1Status: Federal: E =

E = Listed as an endangered species; or previously known as “rare, fully protected” Listed as an endangered species

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BIOLOGICAL RESOURCES MAP

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Picacho Road Bridge Improvement
Biological Resources

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PHOTOGRAPHS

EEC ORIGINAL PKG

PHOTOGRAPHS 2022



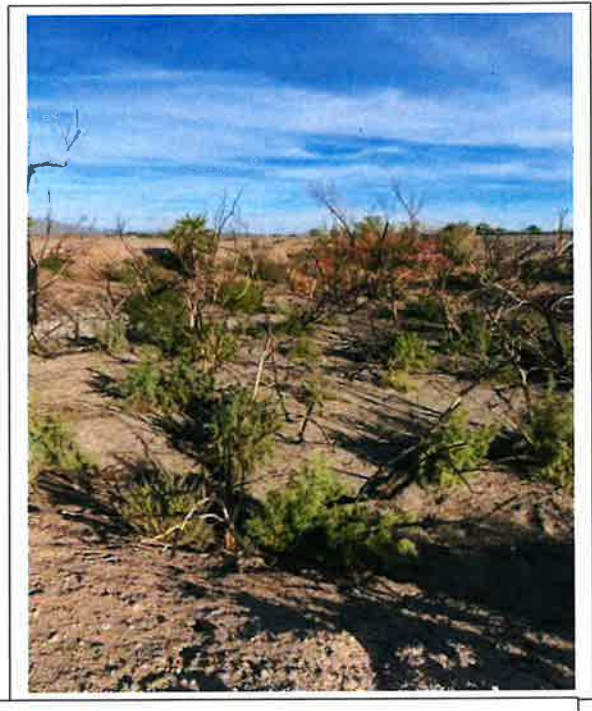
1. The east bank south of Picacho Road. was surveyed



2. Saltcedars on site and adjacent to site were surveyed for nests; none found



3. North side of Picacho Road was surveyed



4. Burned area north of Picacho Road and east of Yuma Main Canal, approximately 0.93acre area with saltcedar regrowth

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5. Bridge to be replaced; looking north sparse vegetation along banks of Yuma Main Canal



6. Desert shaggymane on site



7. Looking north from west end of site; crops off site in background



8. Facing north at bridge; ruderal vegetation to left

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9. Facing west at bridge; ruderal vegetation and saltcedar on site



10. Facing south from north side of C St at bridge



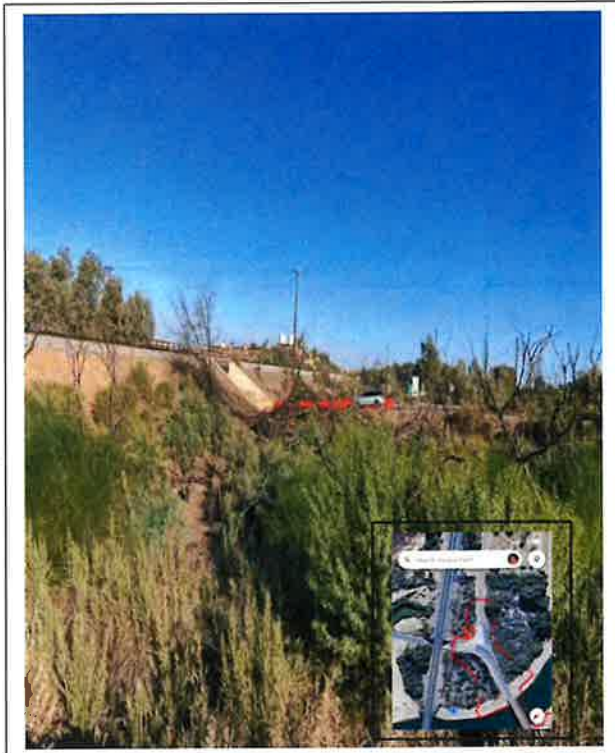
11. West at northeast end of site; no vegetation observed along Yuma Main Canal



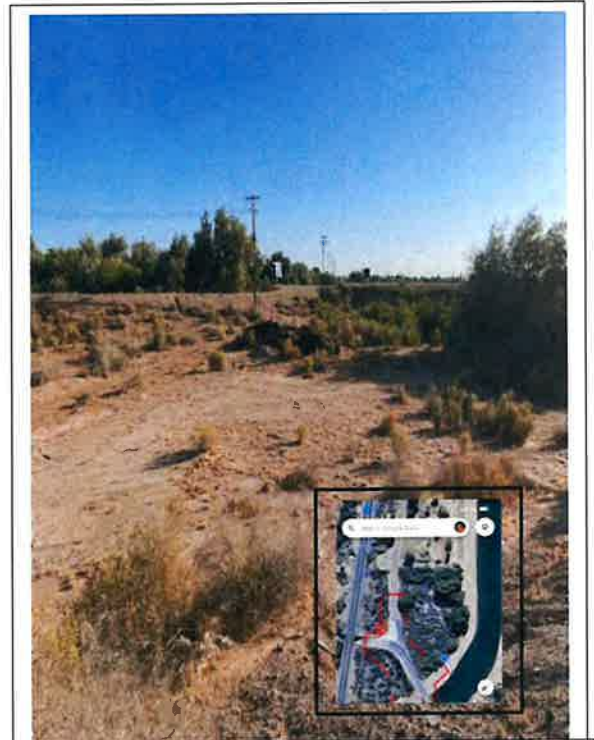
12. Typical ruderal vegetation found on site

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PHOTOGRAPHS 2024



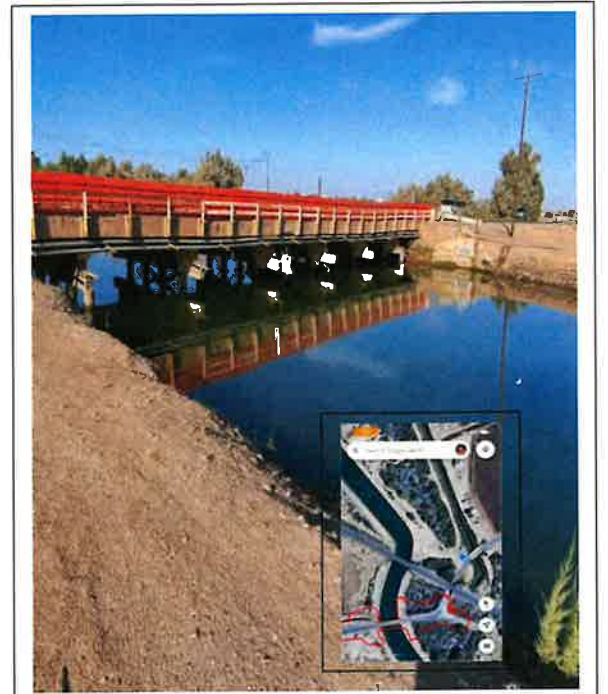
1. Facing south towards Picacho road at burned area in buffer zone 8/8



2. Buffer zone looking south to Picacho road. Not much vegetation, mostly arrowweed and saltbush 8/8



3. Facing west at buffer zone looking at canal and disced field. One mature saltcedar in background 8/8



4. Facing south at bridge from north side 8/8

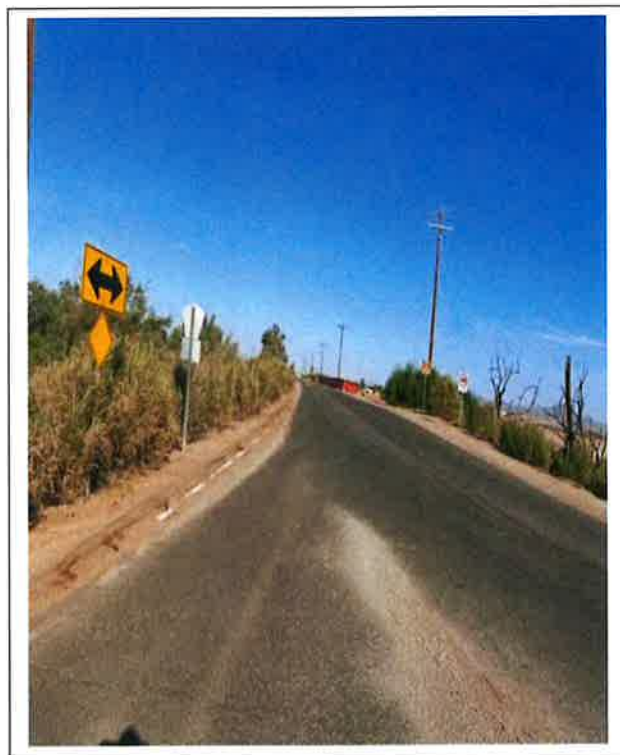
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5. Facing south while on bridge 8/8



6. Facing east while standing on bridge 8/8

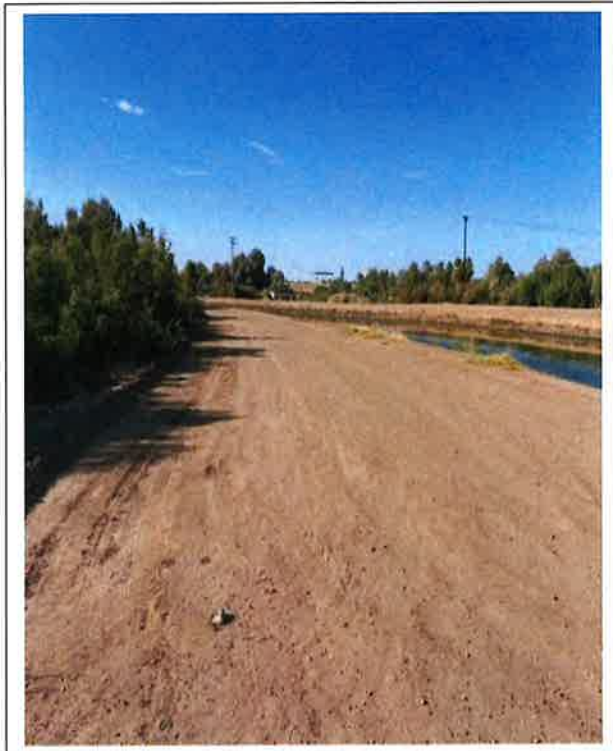


7. Facing west looking at Picacho bridge 8/8



8. Mourning doves perching on the bridge railing;
no nests observed 8/8

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9. Facing south from bridge; looking at a two roads between canal 8/8



10. Disced field to the north outside of buffer zone 8/9



11. Vacant lot with vegetation south of Picacho road 8/9



12. Vacant lot with over grown vegetation in buffer zone 8/9

EEC ORIGINAL PKG

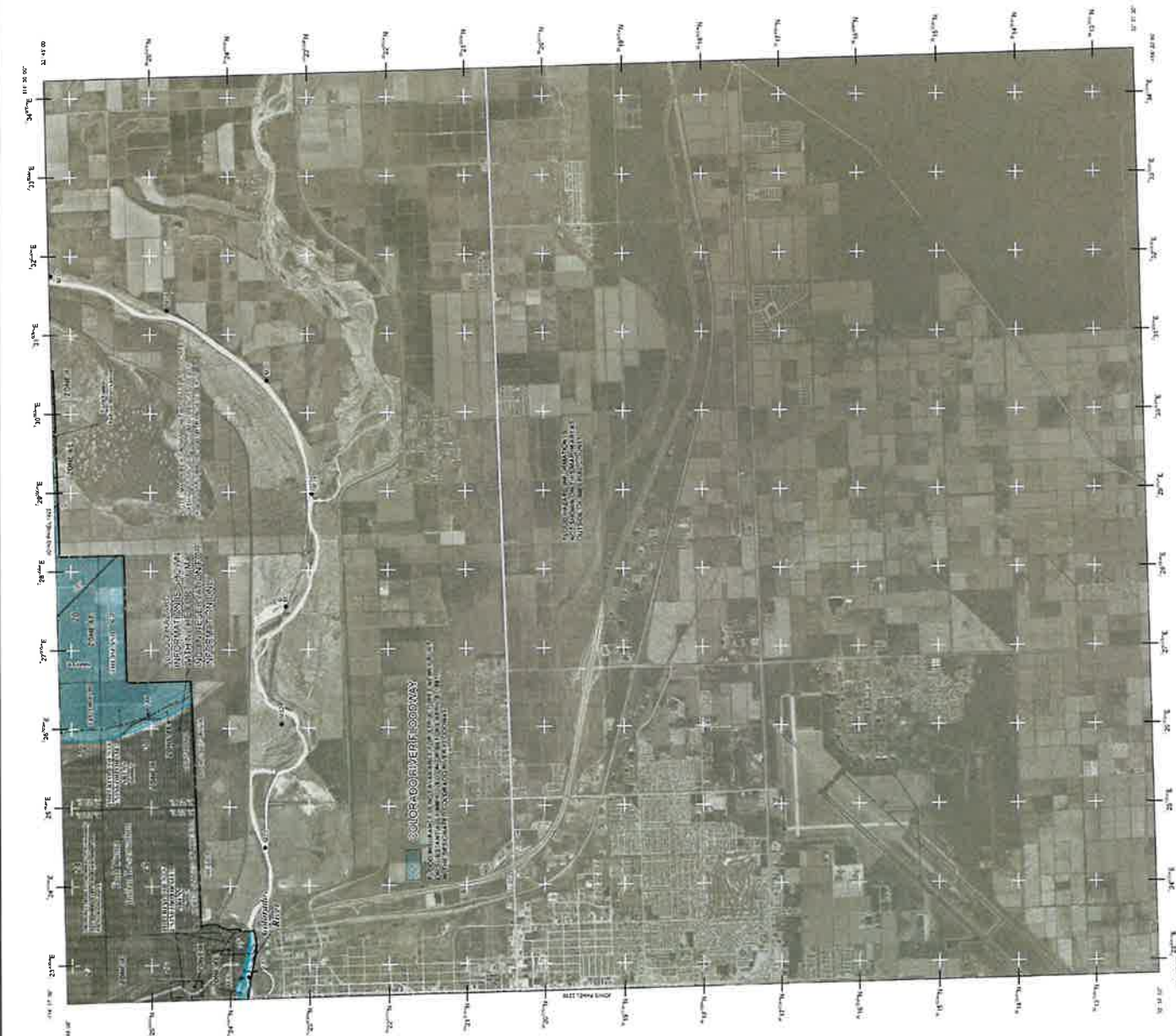
FEMA MAP

EEC ORIGINAL PKG

This map is the only advertisement of the Natural Gas Insurance Program that has not substantially failed to inform the public about its benefits. The program is advertised in a way that is not misleading, and the information is presented in a way that is not deceptive. The map is not misleading because it does not contain any false or misleading information. The map is not deceptive because it does not contain any information that is likely to cause a consumer to make a decision that is not in his or her best interest.

[illegible]

Contact the FEMA Map Service Center at 1-800-338-5610 for information on available products associated with this FEMA. Available products may include previously released Letters of Map Change, an accompanying Flood Insurance Study Report, and/or digital versions of this FEMA Map Service Center product. Also, maps may be received by Fax at 1-800-338-9430 or by e-mail at map_request@fema.gov.

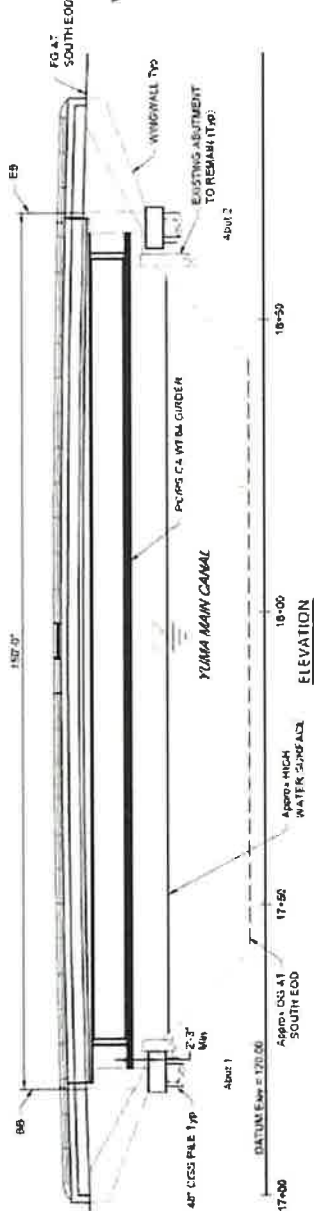
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ENGINEERING PLANS

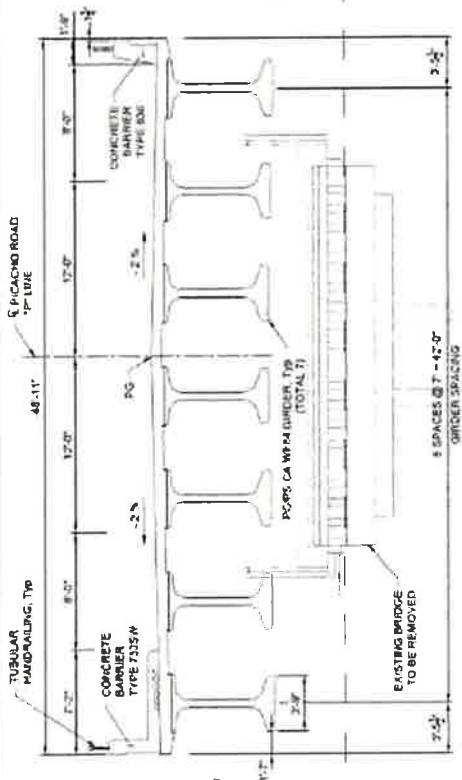
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PROFILE GRADE
SCALE 1" = 4'



PLAN
SCALE 1" = 4'



TYPICAL SECTION
SCALE 1/2" = 1'-0"

- NOTES
- A. Existing utility to be protected in place
 - B. Existing utility to be relocated

- INDEX TO BRIDGE PLANS
1. GENERAL NOTES
 2. BRIDGE DECK
 3. BRIDGE FOUNDATION
 4. BRIDGE ABUTMENT 1 LAYOUT
 5. BRIDGE ABUTMENT 2 LAYOUT
 6. BRIDGE ABUTMENT DETAILS
 7. TYPICAL SECTION
 8. GROUND LAYOUT
 9. POPS WIDE FLANGE GIRDER (MARKED STRAIGHT)
 10. POPS WIDE FLANGE GIRDER (MISCELLANEOUS DETAILS)
 11. JOINT ARMOR FOR PEDESTRIAN WALKWAYS
 12. STEEL REINFORCED ELASTOMERIC BEARINGS
 13. SOIL LEGEND 1 OF 2
 14. SOIL LEGEND 2 OF 2
 15. LOG OF TEST BORING 1 OF 2
 16. LOG OF TEST BORING 2 OF 2

- LEGEND
- Existing Bridge
 - Direction of Flow
 - Existing Bridge to be Removed
 - Sheet Piling

GENERAL PLAN	
REFERENCE	
PICACHO ROAD BRIDGE OVER YUMA MAIN CANAL BRIDGE NO. 58C-0028	
DATE: 10/1/2011	
BY: E. J. B. / J. B. / J. B.	
CHECKED: J. B. / J. B. / J. B.	
APPROVED: J. B. / J. B. / J. B.	
SCALE: 1" = 4'	
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QUALIFICATIONS

EEC ORIGINAL PKG

GLENNA MARIE BARRETT

PO Box 636 Imperial, California 92251 (760) 425-0688
glennabarrett@outlook.com

PROFILE

Organized and focused individual, adept at implementing multifaceted projects while working alone or as an integral part of a team. Skilled in client/employee communications, report preparation, program analyses and development. Cost conscious, safety oriented and empathetic. A strong communicator with excellent interpersonal skills, which allows development of rapport with individuals on all levels. A sound professional attitude, strong work ethic and pride in personal performance.

WORK EXPERIENCE

Senior Biologist Barrett's Biological Surveys, Imperial County, CA April 2016-currently.

Principal Biological Consultant, Barrett Enterprises. Imperial, CA December 2001 - currently. Compile information and complete local, state, and federal government forms; such as conditional use permits, reclamation plan applications, Financial Assurance Cost Estimates, zone changes, CEQA, Environmental Evaluation Committee responses, and 501 (c)(3) tax exemption applications. Act as liaison between local businesses and local, state, and federal government agencies. Certified to survey for Flat-Tailed Horned Lizards in California and Arizona. Certified to survey for the Desert Tortoise.

Kruger- Environmental Compliance Coordinator (ECC) for Seville Solar Complex for a 626-acre solar farm in Imperial County, CA. Compiled and submitted data and reports for APCD such as equipment lists and man hours, water hours for dust suppression; Planning reports such as weekly monitoring reports and scheduling with the third party monitor for work on BLM land; Assisted in writing the Emergency Response Action Plan; CDFW quarterly reports for the Incidental Take Permit for the Flat Tail Horned Lizard (FTHL), CNDDDB reports, FTHL Observation Data Sheets, site tours and any other information required by CDFW; Agriculture Commissioner's Office quarterly reports; provided the hazardous reporting information for the CERS online reporting system; assisted writing the FTHL ITP; trained new hires; contacted various local businesses for different on-call services; also provided any updates for plans and schedules necessary throughout the life of the project; etc. (January 2015- March 2016).

Grant writing experience: Awarded two grants for BUOW educational programs for \$15,000 each from Imperial Valley Community Foundation. Awarded \$35,700 for a total of \$75,000 with matching funds to establish the Imperial Valley Small Business Development Center with the Imperial Regional Alliance. Awarded \$450,000 from the California Public Utilities Commission for a broadband connectivity initiative in Imperial County with Imperial Regional Alliance and Imperial Valley Economic Development Corporation (IVEDC).

FIELD EXPERIENCE

Ms. Barrett has done the field work and contributed to the required reports for the following projects:

- **8ME-Burrowing Owl/MBTA/Avian Mortality Monitoring and training for the Mount Signal Solar Projects** in Calexico, CA (April 2010-2022)

- **Salton Sea Species Conservation Habitat Project** - Imperial County, CA: Nov 2020 -July 2022 monitoring construction for desert pupfish, Ridgway Rails and other species. Found both species on site and consulted with agencies for protective measures.

- **Burrtec- FTHL/MBTA Surveys** in Salton City, CA: Team leader for eight people to complete a pre-construction site sweep for 320 acres in Imperial County. 2014-2022

- **Applied Biological Consulting- Approved Biological Monitor on DPV2:** The 500kV transmission line traverses approximately 153 mi from Bythe, CA to Menifee in Riverside County, CA. Crossing private, state and Federal lands, such as the Bureau of Land Management [BLM],

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U.S. Forest Service [USFS]. Desert tortoise, nesting birds, fringe toed lizard, flat tailed lizard (November 2011 to May 31, 2013)

- **Chandi Group**, Conduct Habitat Assessment Survey (as outlined in Western Riverside Multispecies Habitat Conservation Plan: Burrowing Owl/Narrow Endemic Species) within the City of Jurupa Valley, Riverside County, 2015

EDUCATION AND TRAINING

Received Bachelor of Science in Business Administration with a focus on Management, along with Economics and Leadership minors, December 2000. Humboldt State University, Arcata, CA.

Special Status/listed species observed/ identified, surveyed, monitored and/or relocated: Mohave desert tortoise, Coachella valley milkvetch, Desert kit fox, Mountain lion, Coachella valley fringe toed lizard, Mohave fringe toed lizard, Stephen's kangaroo rat, Mohave ground squirrel, Coast horned lizard, Flat-Tail Horned lizard, Burrowing Owl.

Extensive knowledge in southwestern United States, non-migratory and migratory avian biology and ecology. Strong knowledge of common Flora and Fauna communities associated with Southern California and surrounding environs. CEQA, NEPA, California Endangered Species Act (CESA) and Federal Endangered Species Act (ESA) knowledge gained through work experience. I have excellent analytical skills, multi-tasking and writing abilities. My past work experience has provided me with many years of hands on experience working with and managing others to find practical solutions to solve problems and achieve common goals.

CERTIFICATIONS/ WORKSHOPS

- Desert Pupfish Training CA Department of Fish and Wildlife Sharon Keeney, Summer/Fall 2019-21
- Introduction to Plant Identification CA Native Plant Society June. 2019
- FTHL Workshop, 2008 El Centro BLM office.
- Yuma Clapper Rail Training Colorado River Yuma Bird Festival AZ Game and Fish 2008
- USFW Desert Tortoise Egg Handling Desert Tortoise Council Survey Techniques Workshop Certificate, 2008 and 2010.
- Anza Borrego State Park Wildflower Identification Workshop, 2010.
- Southwest Willow Flycatcher Workshop Kernville, CA, 2010.
- SCE TRTP Construction Monitoring Training Class and WEAP Redlands, CA 2011.
- DPV2 Construction Monitoring Training Class and WEAP Santa Ana, CA 2011.
- Helicopter flight trained on DPV2, 2012.
- Certified to handle/ move venomous snakes on DPV2, 2012.
- Bat monitoring with Ms. Pat Brown BLM El Centro, CA Office, 2010.
- Salton Sea International Bird Festival 2007 Coordinator
- Mountain Plover/ Long-billed Curlew surveys, L.A. Museum of Natural History
- Presented at the Fourth Annual BUOW Symposium in Pasco, Washington, 2014.
- Board Member- Colorado River Citizens Forum, 2014-2016.
- BUOW Educational outreach grantee from IVCF, interacting with IID, IVROP, ICFB, Ag Commissioner's Office, 2015.
- Friends of the Sonny Bono National Wildlife Refuge, Member 2015

Jacob Calanno
Post Office Box 458
Niland, California 92257
760-550-4214

SPECIALTIES: Biological Surveys and Monitoring, Mechanical Process Applications, Field operations.

EDUCATION: Imperial Valley College, Imperial, Ca. - Municipal Water and Waste Water Treatment; Licensing pending.

COMPUTER

SKILLS: Basic computer skills, Lab View for Engineers.

CERTIFIED

SPECIALIZED

TRAINING: Environmental Review & Compliance for Natural Gas Facilities Seminar- June 5-7, 2012
Desert tortoise Surveying, Monitoring and Handling Techniques Certificate Nov. 5-6, 2012
Flat Tail Horn Lizard Training- June 20, 2012
Introduction to Plant Identification, CA Native Plant Society, June, 2019
Desert Pupfish Training CA Department of Fish and Wildlife, Sharon Keeney, Summer Fall 2019
40 Hour Hazwoper Feb. 8, 2013
CALIFORNIA OSHA TITLE-2011
Confine Space Training, 2005
Lockout/Tagout , 2005
Respirator Training, 2005
Operators Safety Training, 2005
Foreman Field Crew Supervisory and Operations Training, 2005

SUMMARY: Biological surveyor and Monitor/ Field Operations Crew Foreman/Operations Technician

For the past ten years I have been specifically working on biological surveys and monitoring including burrowing owl, flat tail horned lizard, desert tortoise and migratory birds. I have 15 years' experience in the environmental remediation industry. My area of expertise is in biological monitoring, remedial mechanical applications, equipment, operations and maintenance programs.

Training and hands on experience working in the field with endangered species:

Desert Tortoise and the Flat Tail Horned Lizard, Desert Pupfish, Ridgway Rail followed compliance policy and procedure when encountering endangered species. This training was received while working on specific projects such as:

WORK EXPERIENCE:

2012-18 Barrett's Biological Surveys
Salton Sea Species Conservation Habitat Project: Imperial, CA: Nov 2020 -current monitoring construction for desert pupfish, Ridgway Rails and other species. Found both species on site and consulted with agencies for protective measures. 8 hrs/day/5 days per week
Project Salton City Burrtec Landfill: 320 acre clearance and provided FTHL training to construction crew(42 hrs)
Project AECOM/IID Burrowing Owl habitat surveys June, 2015
Project Imperial County Public Works Desert Tortoise/MBTA monitoring: 195.7 hours at Walters Camp, near Palo Verde, CA
Project Mesquite Mine: 30 acre desert tortoise clearance; fence installation monitoring (25 hrs)
Project Oat Mine: FTHL monitoring (186 hrs)
Project CalTrans: FTHL monitoring (50 hrs)
Project: Arms and Dudes Film Project FTHL/MBTA monitoring (181 hours)
Project Niland Wastewater Project BUOW/Biological surveys (5 days)

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Project: Hell's Kitchen MBTA Nesting Bird/Burrowing Owl Surveys (5 days)
BLM, El Centro, CA office: Volunteer Bat Surveys with Pat Brown (20 hours)
CDFW, Avian Carcass Collection Volunteer (5 hours)

2005 to 2010 Volper, LLC, Burbank, Ca.

Provided field supervision of construction
Responsibilities include plan and coordinate field construction and activities,
field reports and tracking hours.
Manager/Grower

2003 to 2005 Cape Environmental, Irvine, California

Field Operations Supervisor/Sr. Operations Technician
Provided technical equipment applications support on various environmental
remediation projects.
Responsibilities included; construction, planning and field supervision for the
installation, operation and maintenance of ground water remediation equipment.

2000 to 2003 Foster Wheeler Environmental, San Diego, California

Field Operation Supervisor/Sr. Operations Technician
Provided technical equipment applications support on various environmental
remediation projects.
Responsibilities included; construction, planning and field supervision for the
installation, operation and maintenance of ground water remediation
equipment.

REFERENCES:

Mr. Fredrick Rivera
IR Manager,
Naval Air Facility - El Centro
760-339-2226

Marie Barrett
2035 Forrester Rd
El Centro, CA 92243
760 427 7006

Ed Cooney
Engineering Technician
FEAD/PW Bldg.504 NAF El Centro, CA 92243
760-339-2469

EEC ORIGINAL PKG

Jeremy Scheffler
310 N H Street
Imperial, CA 92251
jscheffler29@gmail.com
760-457-5154

INTRO:

I am a recent graduate from CSU Chico, and I majored in Environmental Science. I pride myself on my problem-solving abilities and my capacity to view situations through different perspectives to find a solution.

EDUCATION:

August 2016- May 2020	California State University, Chico Undergraduate, Senior GPA: 3.04 Environmental Science: Atmosphere & Climate Pathway Minor: Sustainability
August 2012- June 2016	Imperial High School, Imperial, CA Diploma, June 2016 GPA: 3.4

SKILLS:

-Experience with tools	-Experience with groups to complete assignments
-Knowledge of Plant and Insects	-Experience with inspection of ag commodities
-Experience creating/presenting reports	-Familiarity with ArcGIS software
-Analyzing Data	-Communication (Written & Verbal)

EXPERIENCE:

January 2022-Present	Wildlife Biologist , Imperial County, Westmorland, CA monitored construction areas at Salton Sea Species Conservation Habitat Project. Identified nests and established buffer zones. Searched for/identified tree and ground nesting birds and notified lead biologist and helped establish buffers. Monitored to protect buffer zones. Identified various avian species. Observed burrowing owls/burrows, killdeer/black-tailed gnatcatcher/dove/stilt nests/eggs; 100 hrs.
June-Sept, 2022	Wildlife Biologist , Imperial County, Niland, CA monitored construction areas at ORMAT Wister Solar Project. Gained knowledge of mechanics of construction monitoring. Identified various avian species and determined buffer zones. 25 hrs.
Nov, 22-Oct,23	Wildlife Biologist , Imperial County, Niland, CA monitored solar farm for bird carcasses. Surveyed solar farm with a second biologist to determine any bird mortality and completed a format so that a statistical analysis could be performed
April 11/18/Nov 5,2021	Wildlife Biologist , Imperial County, Niland, CA Under guidance of Barrett's Biological Surveys biologist Marie and Glenna Barrett, performed transects on 100 acres observing for desert tortoise, Harwoods' milkvetch and American badger preconstruction surveys prior to solar project

EFC ORIGINAL PKG

April 2, 2021	construction. Found milkvetch plants, assisted collecting plant samples; observed raven nest, performed transect surveys. 20 hours. Wildlife Biologist, Imperial County, Winterhaven, CA Under guidance of Barrett's Biological Surveys biologists Marie and Glenna Barrett, Barrett's Biological Surveys performed a pedestrian nesting bird survey on a linear project of 1mile. Found nesting egrets in a rookery. 2 hours.
March 1 - Current (2021)	Agriculture Biologist, Imperial County, El Centro, CA -Enforce compliance of CCR and CFAC -Inspect and investigate pesticide use and incidents -Sample and ship specimens to lab for ID
September 21 - February 16 (2021)	Agriculture Technician, CDFA, Winterhaven, CA -Enforce CA Food and Ag Code -Inspect Ag commodities for invasive pests -Input necessary data into computer
January 24 – May 15 (2020)	Teaching Assistant/ Grader, Shane Mayor, CSU Chico -Teaching Assistant for the Weather Class -Assist Students With Help on Course Material -Grade Assignments and Tests

RELEVANT COURSE WORK:

-Ecology (Fall 2018)	-Evolutionary Biology (Sp. 2018)
-Earth System Science (Sp. 2019)	-Water & Soils (Fall 2017)
-Sustainability Issues (Fall 2019)	-Senior Seminar in Environmental Science (Sp. 2020)

ACHIEVEMENTS:

Spring 2020	Sustainability Leadership, Certificate , CSU Chico
Spring 2020	Dean's Honor List, Certificate , CSU Chico
Fall 2019	Dean's Honor List, Certificate , CSU Chico



County:	Imperial
Legal Location:	T16S, R22E: Sect. 26 San Bernardino Meridian
USGS Quads:	Yuma West, AZ, and Yuma East, AZ
Project Type:	Pedestrian survey
Project Acres:	4.38
Acres Surveyed:	3.07
NV5 Project No.:	227521-00001136.00

Date: August 27, 2024

To: John Gay, Director of Public Works
County of Imperial
155 S. 11th Street
El Centro, CA 92243

From: Karry L. Blake, MA, RPA, Principal Archaeologist
NV5, Inc.
9450 SW Commerce Circle, Suite 300
Wilsonville, Oregon 97070

Subject: Cultural Resources Survey for the proposed Picacho Bridge Replacement over Yuma Main Canal Replacement Project, Bridge No. 58C-28, County Project No. 6811, County of Imperial, California

Dear Mr. Gay,

The following letter summarizes the results of the cultural resources survey conducted for the proposed Picacho Bridge over Yuma Main Canal Replacement Project.

Project Description

The County of Imperial, California (County) contracted NV5 to conduct a cultural resources survey and evaluation of the built environment for the proposed Picacho Bridge (CalTrans Bridge No. 58C-28) over Yuma Main Canal Replacement Project (project). The project is located along Picacho Rd. (S-24) 0.4-miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East (Figure 1). The bridge spans the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. The purpose of the proposed project is to replace the heavily deteriorated 7-span timber bridge with a new single span structure. Picacho Road Bridge was originally constructed in 1925 and was modified in 1935 and 1947. The original construction consisted of five (5) 19-foot spans supported by timber stringers with minor improvements over the years. The bridge is currently in poor condition and has safety concerns from age and outdated design standards. The proposed Project will replace the Picacho Road Bridge with a structure that reflects current bridge design standards. It is proposed to replace the existing bridge with a new Precast Prestressed Concrete Girder Bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. Additionally, only the updated pile caps will be removed, but the original piles and pile caps will remain in place.

The Area of Potential Effect (APE) measures 4.38 acres and covers all areas of potential ground disturbing activities including those related to construction work for the bridge replacement, any repaving and/or improvement of existing roads, and staging areas. The APE has been updated since the original survey in October 2022. The changes from the original APE and the proposed staging areas can be seen in Figure 2. Construction of the bridge will involve excavation for and construction of concrete abutments situated on 48-inch diameter cast-in-steel-shell (CISS) concrete pile foundations. Excavation depths will reach a maximum of 10 feet from the existing roadway profile at the bridge abutments. Other temporary work

includes removal of the existing abutments, falsework erection and removal, and installation of scour countermeasures at the abutments. New curb, gutter and sidewalk will be constructed on the north side of Picacho Road. Existing vegetation will need to be cleared and grubbed prior to grading operations. A temporary staging yard would be located within the existing County right-of-way of Picacho Road between the bridge and Winterhaven Drive to accommodate the contractor's temporary facilities (see Figure 2 for the County right-of-way/staging area).

A cultural resources survey and evaluation of the built environment were conducted by NV5 Principal Archaeologist, Karry Blake, on October 12, 2022. No archaeological resources were identified during the survey. The built features including the bridge and Yuma Main Canal were examined and documented.

Regulatory Context

The County of Imperial anticipates receiving federal grant money from the Bridge Investment Program administered by the Federal Highway Administration (FHWA) for the Picacho Bridge project. In addition, the project is located in the County of Imperial on the Fort Yuma Indian Reservation and land withdrawn to the Bureau of Reclamation. Based on this combination of funding and jurisdictions, the project is subject to both State and Federal regulations. This includes the California Environmental Quality Act (CEQA). CEQA concerns two classes of cultural resources: “historical resources,” which are defined in Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5 and “unique archaeological resources,” which are defined in Public Resources Code Section 21083. Through its federal nexus, the project must comply with Section 106 of the National Historic Preservation Act (as amended 54 USC 300101, formerly cited as 16 USC 470) and other applicable tribal state and federal regulations including the National Environmental Policy Act of 1969 (42 USC 4321; 42 USC 4331-4335); the Archaeological Resources Protection Act (ARPA) of 1978 (16 USC 470aa-mm); the American Indian Religious Freedom Act (AIRFA) of 1978 (42 USC 1996, 1996a); and the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001-3013).

The Bureau of Reclamation will act as the lead federal agency for Section 106 compliance.

Tribal Consultation

The proposed project is fully within the Fort Yuma Indian Reservation thus tribal consultation was undertaken with the Fort Yuma Quechan Tribe. A meeting was facilitated between the Bureau of Reclamation, Fort Yuma Quechan Historic Preservation Office (Quechan HPO), and NV5 to discuss requirements for conducting cultural resource projects on Tribal land in Spring 2021. Quechan HPO was granted for the completion of the California Historic Resources Information System search in Summer 2021. Quechan THPO staff did not indicate any concern about Traditional Cultural Places within the proposed project area. In October 2022, prior to conducting fieldwork, a Plan of Work for the cultural resource survey was provided to the Quechan THPO to present to the Tribal Council for approval. After receipt of approval, fieldwork was completed on October 12, 2022. The lead federal agency (Bureau of Reclamation) will conduct government-to-government consultation with the Fort Yuma Quechan Indian Tribe on the report's findings.

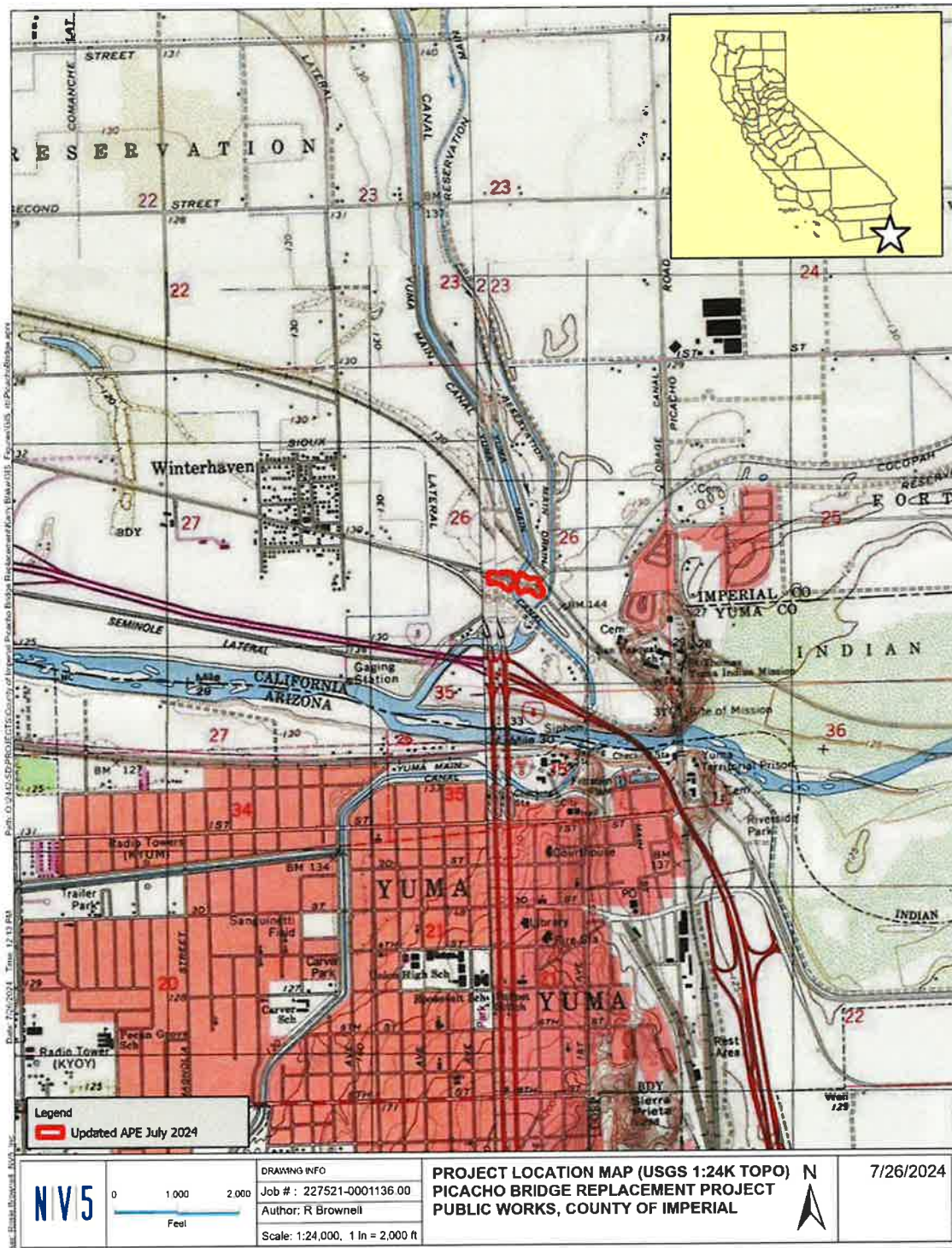


Figure 1: Project Location Map: Yuma East, AZ 1994 (ed. 1998) and Yuma West, AZ 1997 (ed. 2003), USGS 7.5' Series Quadrangles (1:24,000 Scale)

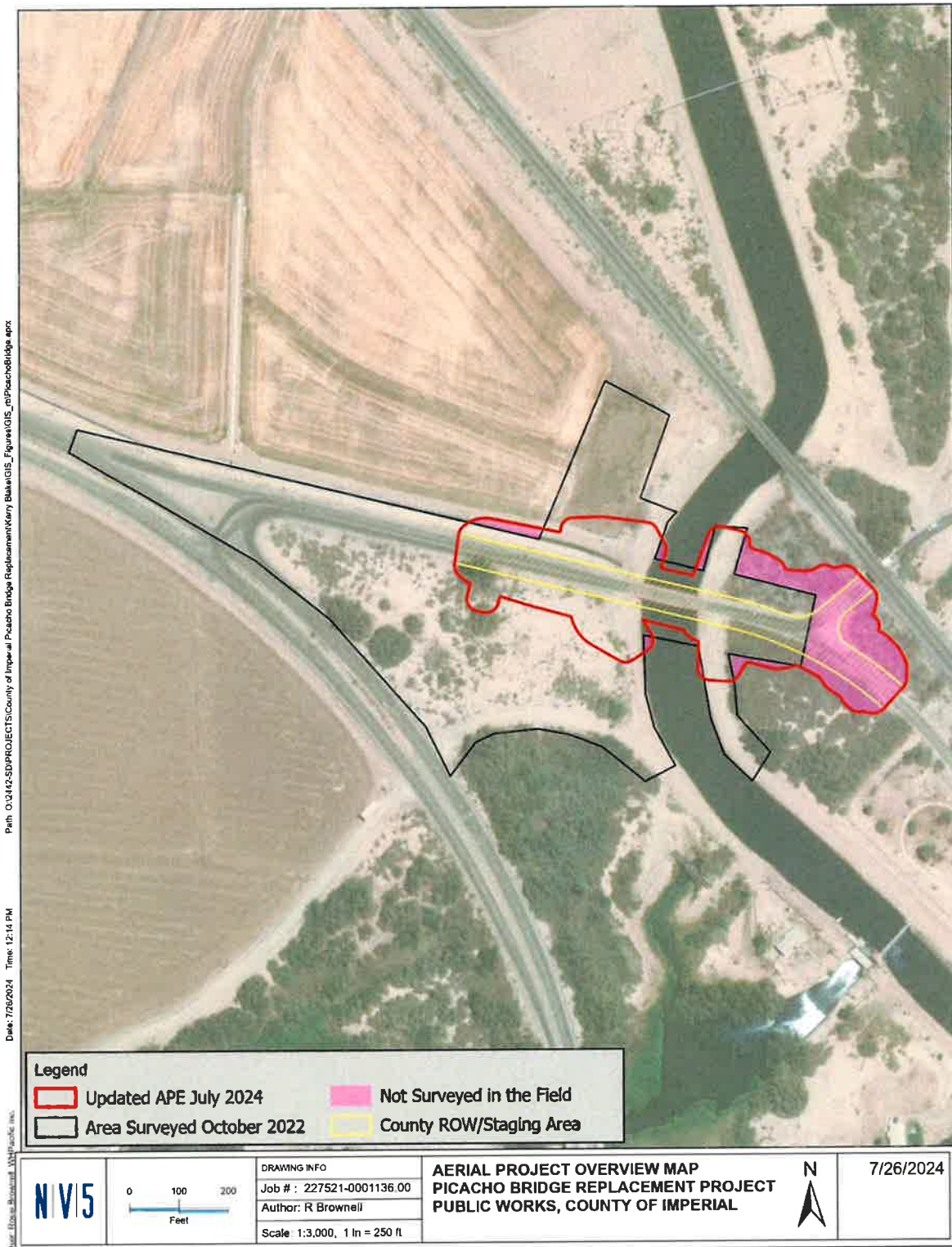


Figure 2: Aerial Overview of the APE

Environmental Setting

At 130 ft (40 m) above sea level, the project is located 0.4 miles north of the Colorado River. The Cargo Muchacho Mountains are 8.5 miles to the northwest, the Algodones Dunes are 13 miles to the west, and the Laguna and Gila Mountains are 11 miles to the east. The project is in the southeastern portion of the Colorado Desert Province and within the Lower Colorado/Gila River Valleys Ecoregion (Griffith et al. 2016; Norris and Web 1976).

The Colorado Desert Province is roughly bounded by the eastern Transverse Ranges to the north, the Colorado River to the east, the Peninsular Ranges to the west, and the Mexican border to the south. The province is characterized by low elevation ranging from approximately 130 ft (40 m) to 350 ft (107 m) above sea level distinguishing it from the higher elevation Mojave Desert Province to the north. The oldest exposed rocks are Precambrian crystalline gneisses, anorthosites, and schists found in the Chocolate, Cargo Muchacho, Palo Verde, Orocopia, Chuckwalla, and Little Chuckwalla mountains (Norris and Web 1976). One of the main features of the province is the Salton Basin dividing the Imperial Valley to the south and the Coachella Valley to the north. The center of the basin is the bed of historic Lake Cahuilla, a freshwater lake that went through many periods of filling and drying up over thousands of years finally drying up for the last time in the first half of the 18th century (Rockwell 2022). In 1905 the Colorado River jumped existing levees near the U.S./Mexico border and over the course of 18 months the entire volume of the river flowed into the Salton Basin forming the Salton Sea measuring 45 miles long, 17 miles wide, and 83 feet deep (National Audubon Society 2022).

The Lower Colorado/Gila River Valleys Ecoregion is located in low elevation corridors along the Colorado and lower Gila Rivers. Much of the landscape has been altered by invasive tamarisks now covering riverbanks which would normally have cottonwoods, willows, and mesquite. Upland areas are dominated by creosote bush and white bursage. A large amount of the land in this Ecoregion is under industrial-scale agricultural production including alfalfa, wheat, barley, lettuce, cotton, citrus, and melons (Griffith et al. 2016).

Soils in the project area are mapped by the National Resource Conservation Service (NRCS) as Holtville Clay in much of the western extent of the project area, Lagunita loamy sand in the north central portion, and Indio Silt Loam roughly encompassing the area between the canal and 100 ft to the west. Indio silt loam also covers the entire area on the east side of the canal. Holtville clay is mixed alluvium found on flood plains. It is more than 80 inches in depth to a restrictive feature and it is classified as prime farmland if irrigated and reclaimed of excess salts and sodium. Lagunita loamy sand is formed from recent mixed alluvium and is found on alluvial fans, flood plains, drainageways, and terraces. It is more than 80 inches in depth to a restrictive feature and it is classified as not prime farmland. Indio silt loam is mixed stream alluvium derived from igneous, metamorphic, and sedimentary rock. It is found on flood plains and is more than 80 inches in depth to a restrictive feature. It is classified as prime farmland if irrigated and reclaimed of excess salts and sodium (NRCS 2022).

Archaeological Overview

The precontact archaeological record of the Southern California can be divided into the following periods: the Terminal Pleistocene and Early Holocene (ca. 13,000 BC to 7000 BP), the Middle Holocene (ca. 7000 BP to 3500 BP), and the Late Holocene (ca. 3500 BP to Euro-American influence and contact in the mid-

18th to early-19th centuries) (Byrd and Raab 2007; Rick et al. 2005). As Sutton et al. (2010) note, the Colorado Desert itself is in an extreme environment and ecological conditions greatly affect its habitability. For example, trends in moisture levels likely influenced occupation strategies that may have left large pieces of desert abandoned or rarely visited during the drier periods. However, in relation to the project area, the Colorado River likely remained a vital point of water and food resources during both wet and dry periods and could have been occupied even during any period. Groups had large territories with shifting boundaries and often shared resources with other groups.

The region has a long history of known human occupation and the oldest evidence comes from the Channel Islands. Human remains found on Santa Rosa Island known as the “Arlington Springs Woman” date to 13,000 BP. The site at Daisy Cave (SMI-261) on San Miguel Island, one of the oldest known sites in California, has evidence of long-term occupation with archaeological material dating back to ca. 10,500 BP. (Erlandson et al. 1996; Glassow et al. 2010). Other sites on the Channel Islands have provided evidence of early human occupation and include intact shell midden deposits, basketry, and cordage. Clovis-style projectile points have also been found in the Mojave Desert, but due to limited finds, only sparse information has been gleaned about Paleo-Indian groups in the immediate area. It is inferred that they were highly mobile and lived in small groups in temporary camps near permanent water sources (Sutton 2010).

In the early Holocene, evidence emerges for the “Lake Mojave Period” between approximately 10,000 BP and 7,000 BP. This period is characterized by leaf-shaped knives, small leaf-shaped points, “Lake Mohave” and “Silver Lake” points, abundant scrapers, engraving tool, crescents, and a lack of groundstone implements (Warren 1967). The lack of groundstone could suggest a low-reliance on plant foods with groups relying more on a foraging-based strategy in relatively small social units. Sites do include a relatively high diversity of raw lithic materials and non-local material such as shell beads suggest that groups had wide spheres of interaction either through trade or travel (Sutton et al. 2010). However, the Late Pleistocene and Early Holocene offer scarce evidence for human presence in the Colorado Desert specifically, which is likely not due to a lack of human presence, but due to high mobility, small group size, instability of landforms such as the Colorado River Valley and simply, a lack of archaeological investigations in the area (Schaefer and Laylander 2010).

Archaeology of the Middle Holocene, ranging from approximately 7000 BP to 3500 BP, is characterized by a decrease in raw material diversity and an increase in groundstone use, possibly indicating an increase on plant food reliance. In addition, larger sites have been observed that correlate closely with water sources and contain substantial middens. This evidence could be related to larger groups using a collector-like settlement strategy based on centralized site locations in favorable locations used as bases for logistical forays into surrounding resource patches (Schaefer and Laylander 2010).

The Late Holocene, beginning in approximately 3500 BP and ending at European contact, is comprised of several distinct periods (called complexes) characterized by diagnostic projectile points and different site characteristics. The first of these complexes, the Gypsum Complex (2000 BC to AD 200), has few sites in the area and does not differ substantially from the previous periods. But the following complex, the Rose Spring Complex (AD 200 to 1100), is marked by a dramatic change in cultural systems with the arrival of bow and arrow technology. New technology brought an increase in population at least partially due to improved resource acquisition strategies including evidence of agricultural practices beginning around 700 AD. Archaeological evidence for the complex includes wickiups and pit houses suggestive of more intensive occupation. In addition, artifact assemblages diversify with the addition of knives, drills, pipes, bone awls, groundstone, marine shell ornaments and large quantities of obsidian. During the Rose Spring Complex, Patayans, ancestors of the Yavapai and Yuman peoples, made the first known ceramics known in the Colorado Desert (Sutton et al. 2010).

Ethnographic Background and Post Contact History

The projected is in the traditional territory of the Quechan (also known as Yuma) people. The Quechan people lived in a series of settlements or rancherias north and south of the Colorado River and Gila River confluence. People moved settlements through the year in response to river conditions and seasonal flooding. Traditional lodging included ramadas, dome-shaped arrowweed shelters during the farming season, and rancheria leaders and their families typically lived in three sided earthen shelters framed with posts and horizontal slats between which arrowweed was stuffed (Bee 1983).

Foraged and cultivated plant foods provided much of the Quechan diet. Foraged drought-resistant mesquite and screw bean seeds and pods were always important staples and particularly essential during drought or harvest failures. Crops planted in a seasonal rotation in post-flood silt deposits along the rivers included teparies, maize, watermelons, black-eyed beans, pumpkins, muskmelons, winter wheat, and wild grasses. Important material culture included mortars and pestles for processing plant foods, digging sticks, and bows and arrows (Bee 1983).

Estimates put the Quechan population at 4,000 on the eve of Euro-American contact. Hernando de Alarcón's Spanish company was recorded in Quechan territory as early as 1540 and may have been the first direct European contact with the tribe (Bee 1983). A Jesuit priest, Father Eusebio Francisco Kino visited in 1698 and in 1780 a Franciscan, Padre Fransico Garcé established two missions in Quechan territory. Within a year of the missions' establishment, the Quechan reclaimed control of their territory and maintained control until the mid-1850s (Waldman 1999). This contrasted with the establishment of 21 other missions between San Diego and San Francisco that succeeded in enforcing mass conversions of other tribes many of whom became laborers forced to work for missions or landowners. Although Spanish priests persisted in attempting to convert the Quechan, the Quechan did not suffer the same degree of cultural erasure as those peoples subjected to life under the missions (Bee 1983). However, diseases brought in by the Spanish and other Euro-Americans still decimated regional populations (Bean and Smith 1978).

The position of Quechan territory at the confluence of two major rivers made it a strategic and active area for soldiers and settlers moving through the area in the eighteenth and nineteenth centuries. In the mid-nineteenth century large numbers of Euro-American settlers began to pass through the area on their way into California. In 1852 Fort Yuma was built on a bluff near the confluence with the purpose of protecting settlers and other traffic through the area. By the late nineteenth century, the number of Euro-American settlers in the area continued to increase and settlers began to take the fertile river bottomlands traditionally farmed by the Quechan. The Fort Yuma Reservation was created by the federal government in 1883 and the tribe formally signed away most of its land under pressure in 1886 with the agreement only allowing for five acres per person living at the time. The rest of the land was sold at auction (the legality of this whole process was challenged for years by the tribe). Finally, after lengthy negotiations with the Department of the Interior, 25,000 acres of the original 1884 reservation were restored to the tribe in 1978 based on the government not meeting the original conditions (Bee 1983 and Waldman 1999). The tribe has been able to acquire additional land over the years and the Fort Yuma Quechan Indian Tribe reservation covers 45,000 acres and has over 3,200 enrolled members. Agriculture is the primary land use on the reservation (Fort Yuma Quechan Tribe 2022).

Records Research and Literature Review

NV5 archaeologist, Karry L. Blake, requested a records search of the APE and adjacent area from the California Historical Resources Information System (CHRIS). The search results were received from the South-Central Coastal Information center June 2021. This kind of search allows for predictions to be made regarding the occurrence and frequency of archaeological sites in areas that have not been previously identified. Results include an inventory of 20 surveys previously conducted within ¼-mile of the APE including nine surveys that cross the current APE. The surveys were conducted for a variety of projects including fiber optic and other utility lines, home sites, railroad work, bridge work, road construction, and water/sewer line projects. CHRIS provided copies of shapefiles showing survey and resource locations and copies of seven of the twenty survey reports cited in the results (Table 1). Two of those were surveys previously conducted in the APE (Maxon 1984 and von Werlhof 1996); no copies of site records were received.

In addition, historic maps including a General Land Office plat dating to 1854, 1857, and 1889, and USGS Topographic maps dating to 1952 and 1965 were examined for any pertinent cultural information. The 1857 plat shows a road with a northeast-southwest path in the vicinity of the project area, but no other development is clear in the General Land Office plats. By the 1952 topographic map, the Yuma Main Canal and Picacho Road are visible. The Yuma Main Canal is a historic linear resource constructed in 1912 and evaluated as eligible to the NRHP. Bridge 58C-28 on Picacho Road over the Yuma Main Canal was constructed in 1925 and rehabilitated in 1947. It was determined not eligible to the NRHP. The canal and bridge will be discussed further in the results section below.

Table 1: Previous Cultural Resource Investigations within ¼-mile of the Project Area

CHRIS ID	Report Title and Reference
00447	<i>Archaeological Resources of the Fort Yuma Indian Reservation Portion of Yuma Crossing National Historic Landmark in Imperial County, California and Yuma County, Arizona</i> Stone, Lyle M. 1990
00598	<i>Proposed Yuma Division Dredge Spoil</i> Maxon 1984
00609	<i>Archaeological Survey of the Yuma Division Colorado River Front Work and Levee System</i> Prescott College Archaeological Survey 1973
00667	<i>Archaeological Survey, Yuma County, Arizona, Colorado River International Salinity Control Project</i> Gumerman and Weed 1973
00686	<i>Archaeological Survey of Two Segments of the Interstate 8 Right-of-Way, Imperial County, California</i> McDonald and Victorino 1997
00813	<i>From Yuma Lift Station to Quechan Community Center, An Engineering Project Funded by An Environmental Protection Agency Borders 21 Program</i> von Werlhof 2002
00851	<i>Archaeological Investigations of Picacho Road and Yuma Main Canal Bridge, No. 58C0028</i> von Werlhof 1996

Expected Resource Types

Although the location of the APE is likely in an area that saw significant levels of precontact and historic activity, its position in and adjacent to a road and bisected by a large canal means that likely the entire APE has undergone significant ground disturbing activities related to construction activities (excavation, fill placement, dredging, etc.). For these reasons, the potential for the discovery of intact cultural resources was anticipated to be low. However, there is always a possibility of archaeological discovery, and it was anticipated that if found, cultural resources would most likely be pre-contact artifact scatters or isolates related to resource acquisition areas, historic artifacts related to canal construction and/or general household refuse related to historic-period dumps near the roadway.

Field Methods

Fieldwork was performed by NV5 Principal archaeologist, Karry L. Blake, on October 12, 2022. The archaeologist was provided with USGS topographic quadrangle maps and high-resolution aerial photographs depicting the APE. In addition, GIS shapefiles of the APE were uploaded to handheld FieldMaps application supported by a Juniper Geode device with sub-meter accuracy used to record the locations of survey transects, roads, and other features encountered during the field investigations. The project area was walked in parallel north-south transects spaced no more than 10 meters apart. Surface visibility averaged roughly 95 percent with areas of up to 100 percent visibility and some as low as 50 percent. No artifacts or cultural features were encountered during the pedestrian survey.

Results

Archaeological Pedestrian Survey

The project APE is heavily disturbed and filled with materials resulting from dredging the Yuma Main Canal (Figures 3 to 6). Southwest of the bridge the APE is primarily dredge materials with associated aquatic snails mixed in the sandy silt. Dredge materials deposited in this area have been periodically leveled to allow for the placement of additional materials around the margins of this space. These dredge spoils are located primarily in the southwest portion of the APE, but older spoils are in the northeast and southeast. Intact surfaces include areas in the northern half of the project area. Modern trash was frequently encountered throughout the APE. No cultural resources were encountered during this survey.

Update Regarding 2024 APE Change

The final APE has shifted from the original area surveyed in 2022. Although the original APE includes most of the revised version, there are a few areas along the eastern and northern portions of the APE that were not subject to pedestrian survey (please review Figure 2 for the details). Approximately 3.07 acres of the total 4.38 acres APE were surveyed. When Ms. Blake was onsite in October 2022, she noted that the eastern portion of the APE (including the adjacent unsurveyed portions) had been built up with dredged materials and therefore showed little likelihood of intact cultural deposits. As the new additions to the APE are capped with dredge materials, NV5 does not recommend additional an archaeological survey of the APE.



Figure 3: Overview of the southwest portion of the APE, view to the northwest



Figure 4: Overview of the northwest area of APE, view to the north



Figure 5: Overview of the northeast area of the APE, view to the southeast



Figure 6: Eroding dredge deposits found around the margins of the southwest portion of the APE

Historic Architectural Survey

Yuma Main Canal

The **Yuma Main Canal is a historic property** as it is part of the Yuma Project or Yuma Irrigation Project (YIP) which has been determined eligible for inclusion on the NRHP. The YIP was recommended National Register of Historic Places (NRHP) by Pfaff et al.'s (1999) report under Criteria A and C. The YIP was created by the United States Reclamation Service as a way of transferring water from the Colorado River to communities on both sides of the river: in Imperial County, California and Yuma County, Arizona (Pfaff et al. 1999). The YIP was originally divided into three administrative units, one of which, the Reservation Division, encompassed lands lying north and west of the Colorado River in California within the boundaries of the Quechan Indian Reservation which includes the current APE. The YIP originally included one diversion dam, ten primary canals measuring approximately 60 miles in length and approximately 218 miles of laterals. Surveys for the project began in 1903 and construction began in 1905. Project components included a dam to control and divert river water into adjoining canals. The Yuma Main Canal (sometimes referred to as the California Main Canal), is the largest canal of the YIP. It travels over 10 miles from the end of Laguna Dam southwest and south to the northern bank of the Colorado River where it crosses under

the river through an inverted siphon then travels west through Yuma before bifurcating into the East and West Main canals. The Yuma Main Canal was constructed in three sections starting in 1909 and completed in 1912 (Pfaff et al. 1999; Stene 1996).



Figure 7: Overview of Yuma Main Canal and Picacho Bridge access road, view to the south-southeast

Picacho Road Bridge over Yuma Main Canal (CalTrans Bridge No. 58C-28)

Picacho Road Bridge over Yuma Main Canal was constructed in 1925 and rehabilitated in 1947 (California Historic Bridge Inventory). It was previously determined not eligible for the NRHP (CalTrans 2019). An inspection of the bridge indicated that the bridge remains unchanged. It is a timber structure with an asphalt deck.



Figure 8: South side of the Picacho Bridge taken from the eastern end of the bridge, view to the west

Conclusions and Recommendations

Imperial County proposes to replace the failing bridge over the Yuma Main Canal along Picacho Road with a new structure. A cultural resources survey was conducted in compliance with CEQA and Section 106 requirements. No archaeological resources were encountered. Two historic resources were observed: the Picacho Road Bridge over Yuman Main Canal and the Yuma Main Canal.

Picacho Road Bridge over Yuma Main Canal (CalTrans Bridge No. 58C-28)

The existing bridge was put in place in 1947 and meets the age criteria to be considered as an above ground historic resource. Previous evaluation has recommended this structure as *not eligible* for the NRHP. NV5 concurs with this recommendation. It is the recommendation of NV5 that the construction of the proposed facilities will have **No Adverse Effect** upon any cultural resources. NV5 recommends that no further archaeological work is needed, and project development should proceed as planned.

Yuma Main Canal

The Yuma Main Canal is a historic property and will continue to convey its significance and maintain its integrity, therefore NV5 recommends a finding of **No Adverse Effect** on this historic property. Work on the bridge has been planned to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. Additionally, the original piles and pile caps will remain in place.

Development always presents the potential to expose previously undetected subsurface cultural resources during construction. If this should occur, all construction should cease, and a qualified archaeologist should be consulted. The protocols of an Inadvertent Discovery Plan (Appendix A) should be implemented. If human remains are encountered during excavation or other ground disturbing activities, work in and around the remains must halt and the Imperial County coroner notified and provisions of NAGPRA followed.

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Appendix A: Archaeological Inadvertent Discovery Plan (IDP)

Picacho Bridge Replacement over Yuma Main Canal Replacement Project, Bridge No. 58C-28, County Project No. 6811

How to use this document



Archaeology consists of the physical remains of the activities of people in the past. This IDP should be followed should any suspected archaeological sites, objects, or human remains are found. These are protected under Federal and State laws and their disturbance can result in criminal penalties.

This document pertains to the work of the Contractor, including any and all individuals, organizations, or companies associated with Picacho Bridge Replacement over Yuma Main Canal Replacement Project.

What may be encountered

Archaeology can be found during any ground-disturbing activity. If encountered all excavation and work in the area **MUST STOP**. Archaeological objects vary and can include evidence or remnants of historic-era and precontact activities by humans. Archaeological objects can include but are not limited to:

- **Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads.**
- **Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles, beads.**
- **Layers of discolored earth** resulting from hearth fire
- **Structural remains such as foundations**
- **Shell Middens**
- **Carved or engraved stone and/or metal coffin fittings, coffin wood**
- **Human skeletal remains and/or bone fragments** which may be whole or fragmented.

For photographic examples of artifacts, please see the attached images (Human remains not included).

If there is an inadvertent discovery of any archaeological objects, see procedures below.

If in doubt call it in.

Discovery Procedures: What to do if you find something

1. *Stop ALL work in the vicinity of the find*
2. *Secure and protect area of inadvertent discovery with 30 meter/100 foot buffer—work may continue outside of this buffer*
3. *Notify Project Manager and Agency Official*
4. *Project Manager will need to contact a professional archaeologist to assess the find.*
5. *If an archaeologist determines the find is an archaeological site or object, **the stipulations of 36 CFR 800.13(b) for Post-review discoveries without prior planning, will apply.***
6. *For post-review discoveries, contact the California SHPO and the **Bureau of Reclamation, Yuma Area Office, Environmental Planning Group (928) 343-8100.***

Human Remains Procedures

1. *If it is believed the find may be human remains, stop ALL work.*
2. *Secure and protect area of inadvertent discovery with 30 meter/100 foot buffer, then work may continue outside of this buffer with caution.*
3. *Cover remains from view and protect them from damage or exposure, restrict access, and leave in place until directed otherwise. **Do not take photographs. Do not speak to the media.***
4. *If human remains are encountered, **immediately notify the Bureau of Reclamation, Yuma Area Office, Environmental Planning Group (928) 343-8100. Also notify:***
 - *Project Manager*
 - *County of Imperial*
 - *Imperial County Coroner **DO NOT CALL 911***
 - *Office of Historic Preservation (OHP)*
 - *Native American Heritage Commission (NAHC)*
 - *Appropriate Native American Tribes*
5. *If human remains are encountered and determined not to be a crime scene by the local Police Department and Imperial County Coroner, **the procedures in 43 CFR 10.5 for Discovery of human remains or cultural items on Federal or Tribal lands, will be followed.***
6. *Do not resume any work in the buffered area until a plan is developed and carried out between the Coroner, OHP, NAHC, and appropriate Native American Tribes or descendent groups and you are directed that work may proceed.*
7. *If human remains are encountered, **immediately notify the Bureau of Reclamation, Yuma Area Office, Environmental Planning Group (928) 343-8100.***

Contact Information

- Project Manager, Katherine Morrison: 562-787-3877
- County of Imperial, John Gay, Director of Public Works: 442-265-1818
- Archaeologist: *to be identified at project implementation*
- Imperial County Coroner : 760-339-6302
- California Office of Historic Preservation (OHP)

- State Historic Preservation Officer (SHPO), Julianne Polanco: 916-445-7000
 - Deputy SHPO, Tribal Liaison, Jody L. Brown, 916-445-7000
- NAHC, Andrew Green: 916-573-1072/916-373-3710
- Appropriate Tribes and Descendent Groups (to be determined after OHP and NAHC consultation)

Confidentiality

The Picacho Bridge Replacement over Yuma Main Canal Replacement Project employees shall make their best efforts, in accordance with federal and state law, to ensure that its personnel and contractors keep the discovery confidential. The media, or any third-party member or members of the public are **not** to be contacted or have information regarding the discovery. Prior to any release, the responsible agencies and Tribes/Descendent Groups shall concur on the amount of information, if any, to be released to the public.

To protect fragile, vulnerable, or threatened sites, the National Historic Preservation Act, as amended (Section 304 [16 U.S.C. 470s-3]), and California State Health and Safety Code, Section 7050.5, and PRC Section 5097.98 establishes that the location of archaeological sites, both on land and underwater, shall be confidential.

Supplementary Information: Visual Reference Guide to Encountering Archaeology



Stone flakes



Stone tool fragments



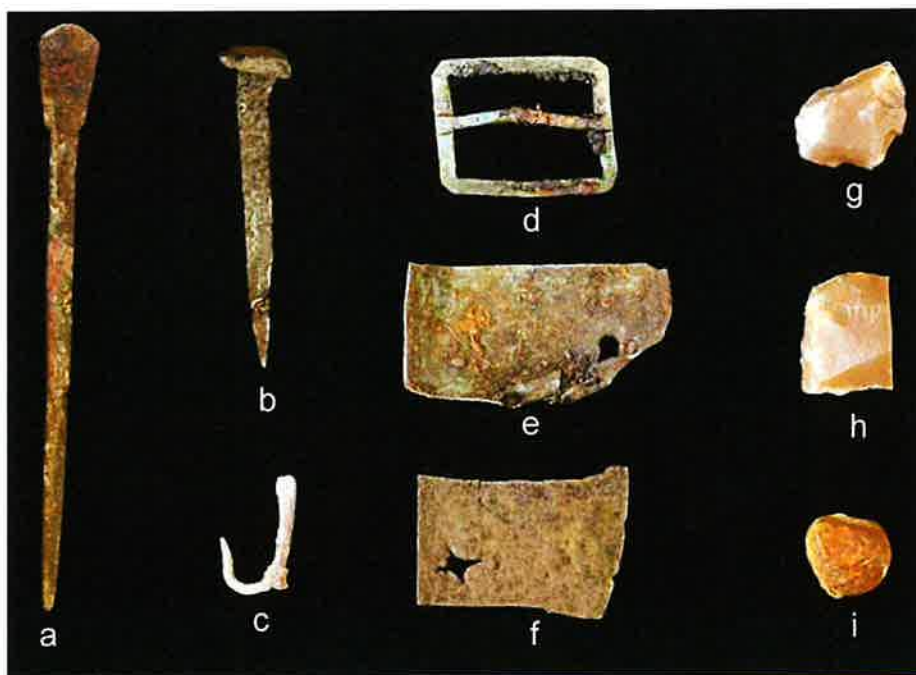
Cordage



Shell midden

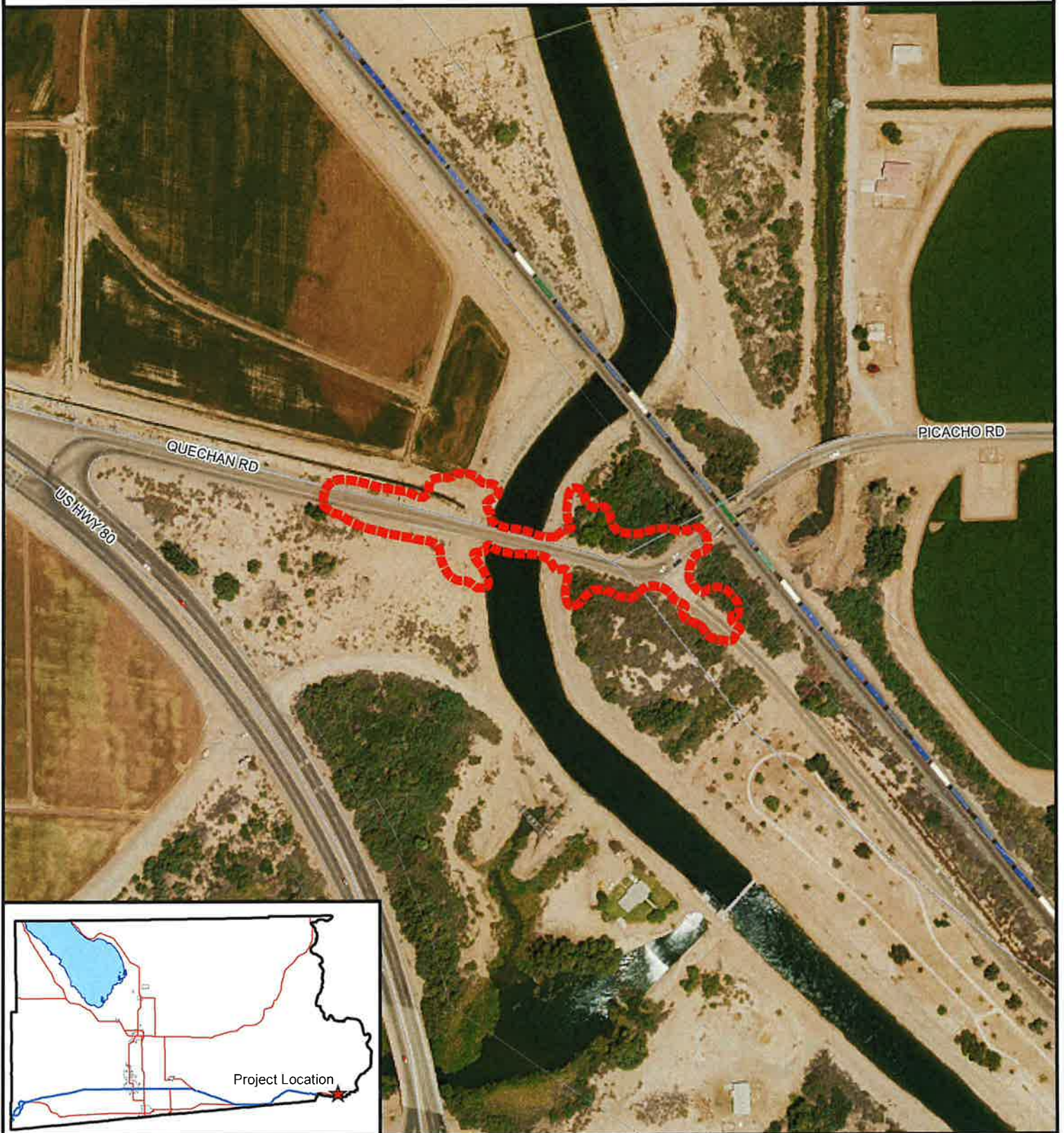


Historic glass artifacts



Historic metal artifacts

PROJECT LOCATION MAP

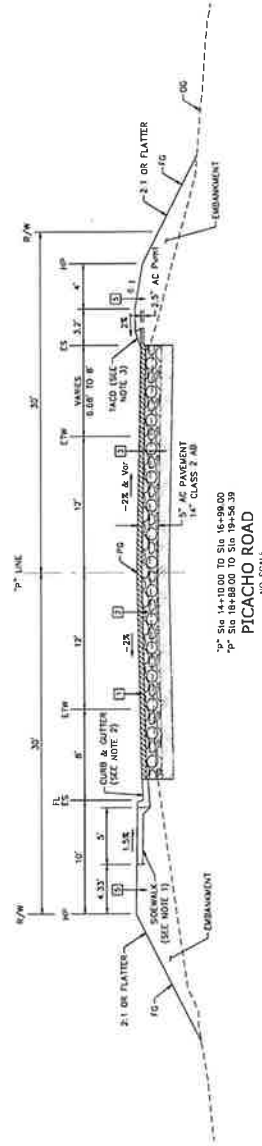
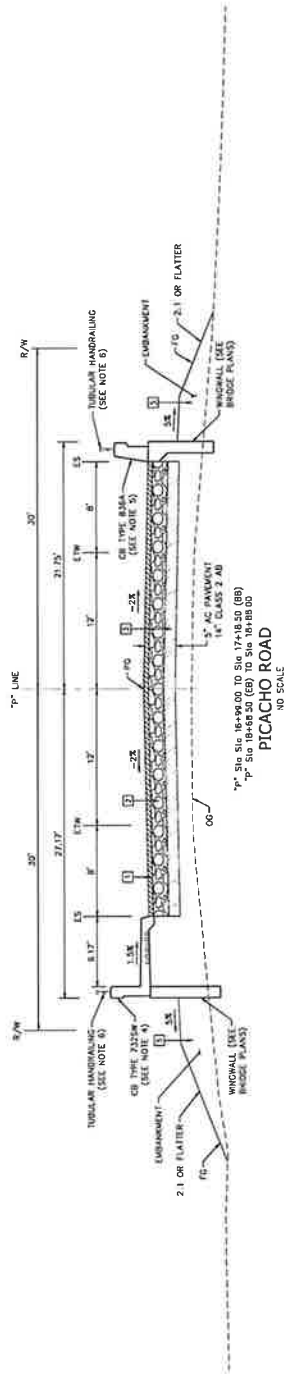
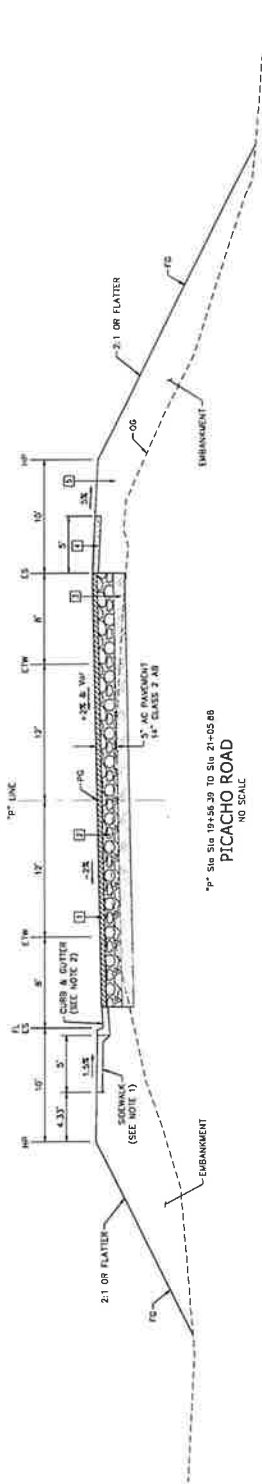


PICACHO RD BRIDGE REPLACEMENT IS #24-0037

-  Project Location
-  Centerline
-  Parcels

EEC ORIGINAL PKG





- NOTES:**
1. FOR CONCRETE SIDEWALK DETAIL, SEE KCDPW Dwg No. 420
 2. FOR CURB & GUTTER DETAIL, SEE KCDPW Dwg No. 480
 3. FOR TRANSMISSION ASPHALT CONCRETE DIKE DETAIL, SEE KCDPW Dwg No. 402 FOR EXACT LOCATIONS OF DIKE, SEE SHEETS PP-1 AND PP-2
 4. FOR CONCRETE BARRIER TYPE 7325W DETAILS, SEE CALTRANS STANDARD PLANS B11-58 AND B11-59
 5. FOR CONCRETE BARRIER TYPE 835A DETAILS, SEE CALTRANS REVISED STANDARD PLANS RSP B11-78 AND RSP B11-80
 6. FOR TUBULAR HANDRAILING DETAILS, SEE CALTRANS STANDARD PLAN B11-51
 7. CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE COMPACTED TO A MINIMUM OF 95 PERCENT FOR AT LEAST 12 INCHES BELOW THE GRADING PLANE

1. 5 INCHES HOT MIX ASPHALT (HMA) SHALL BE CALTRANS TYPE A OR B, 3/4 INCH MAXIMUM-MEDIUM GRAIN, COMPACTED TO A MIN. OF 95% OF THE THEORETICAL MAX. DRY DENSITY
2. 14 INCH CLASS II AGGREGATE BASE SHALL BE CALTRANS CLASS II, 3/4 INCH MAX. COMPACTED TO A MIN. OF 95% OF ASTM D1557 MAX. DRY DENSITY
3. SCARIFY AND RECOMPACT MIN. 12 INCH OF EXISTING MATERIAL TO 95% RELATIVE DENSITY ASTM D1557 AT 1 1/2 INCH LAYERS. IF THE EXISTING MATERIAL IS NOT AVAILABLE, THE BASE SHALL BE 8 INCH. FOR WHITE CLAY SOILS, COMPACT TO A MIN. OF ASTM D1557 DENSITY CAN BE USED.
4. SHOULDER BACING, 8 INCHES CLASS II AGGREGATE BASE COMPACTED TO 95% OF ASTM D1557 MAX. DRY DENSITY
5. IMPORT MATERIAL SHALL BE OBTAINED FROM A LEGAL SITE, COMPACTED TO 95% RELATIVE DENSITY ASTM D1557 AT A MIN. 8 IN. TO 8 IN. ABOVE OPTIMUM MOISTURE COMPACTION SHALL BE IN LAYERS OF 8 INCH

EEC ORIGINAL PKG

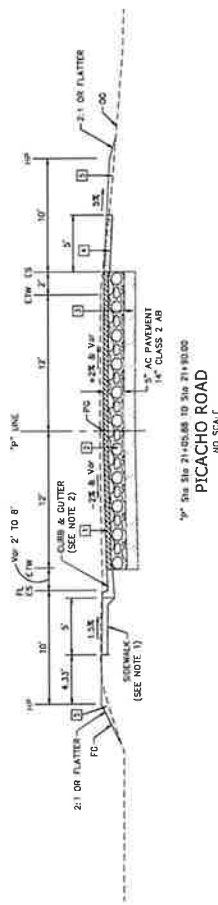
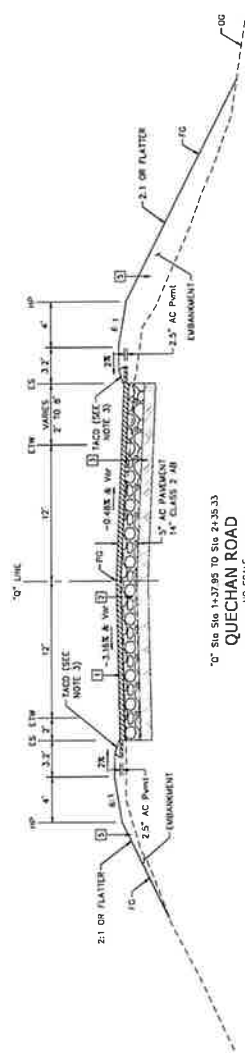
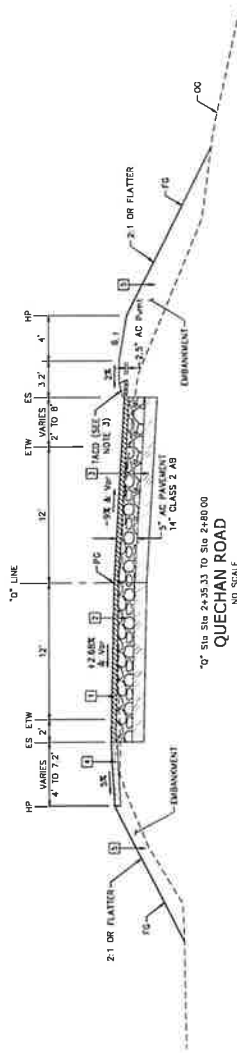
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REVISION		DATE	COMMENTS
TYPICAL CROSS SECTIONS			
PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. _____ COUNTY PROJECT NO. 6811		REFERENCE	X-1
		SHEET OF	2, 29

COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY:		DATE	8/20/20
COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA		DATE	8/20/20

COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY:		DATE	8/20/20
COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA		DATE	8/20/20

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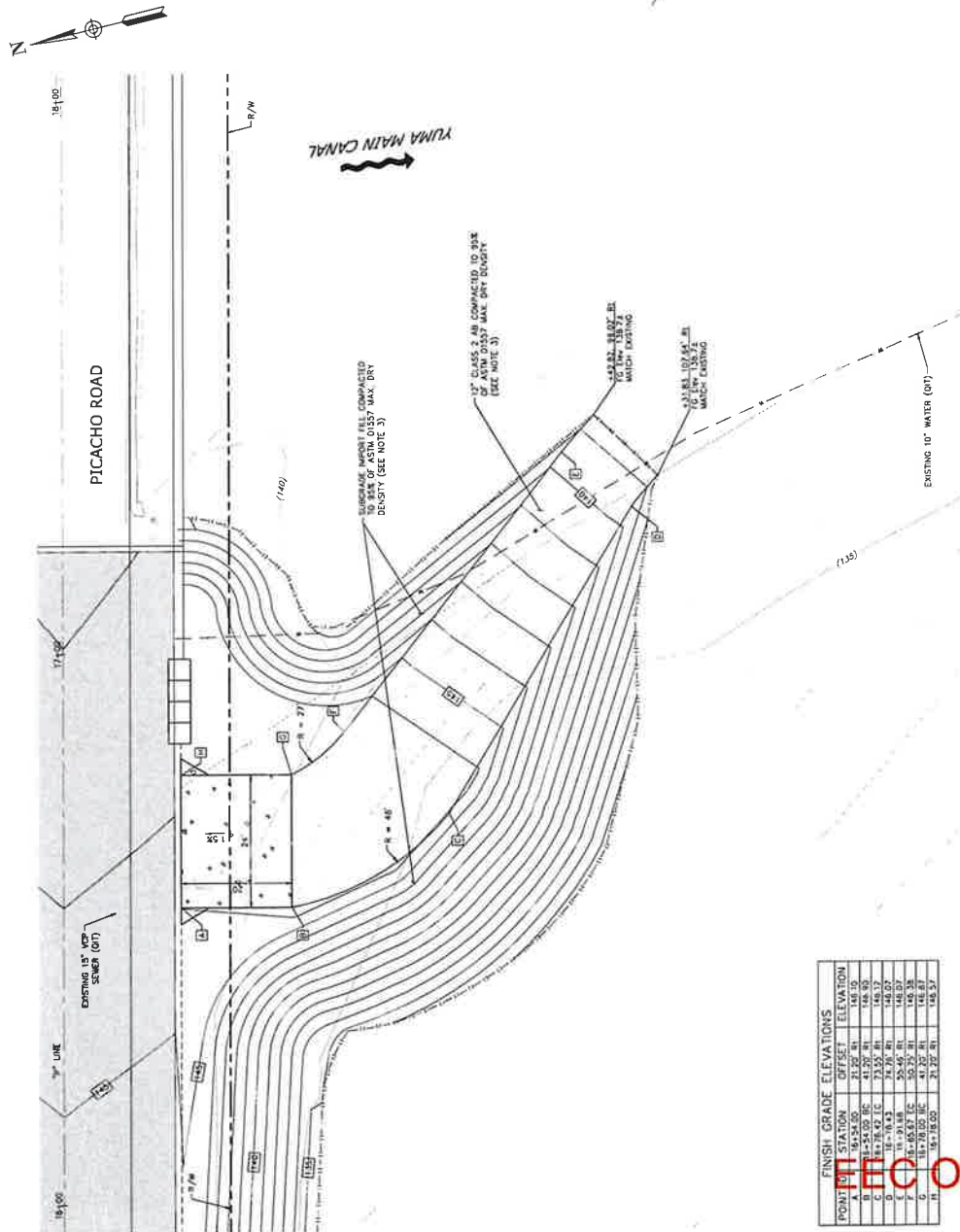
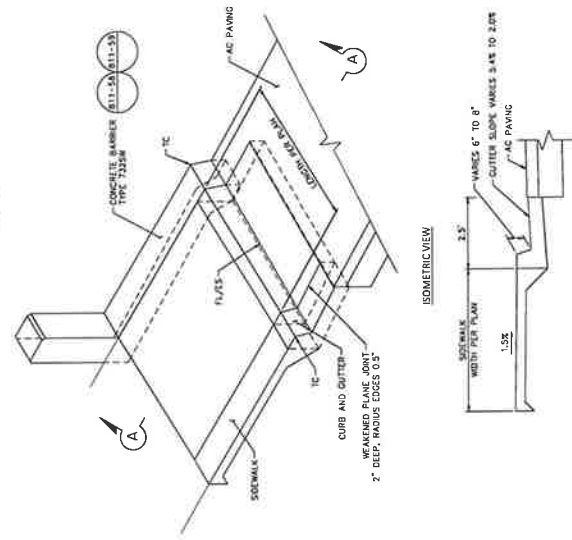
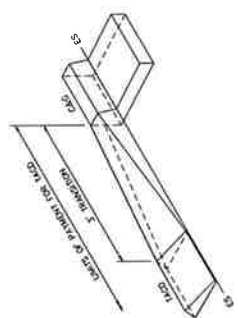
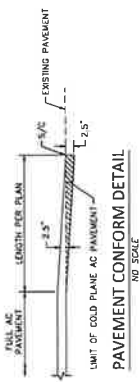


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3. INCHES HOT WAX ASPHALT (HWA) SHALL BE CALVARIUS TYPE 1 OR B, 8 INCH MAXIMUM-MEDIUM GRADES COMPACTED TO A MIN. OF 95% OF THE THEORETICAL MAXIMUM DENSITY ASTM D1559
4. 18 INCH CLASS 4 AGGREGATE BASE SHALL BE CALVARIUS CLASS 4, 8 INCH MAX COMPACTED TO A MIN. OF 95% OF THE THEORETICAL MAXIMUM DENSITY ASTM D1559
5. 18 INCH CLASS 5 AGGREGATE BASE SHALL BE CALVARIUS CLASS 5, 8 INCH MAX COMPACTED TO A MIN. OF 95% OF THE THEORETICAL MAXIMUM DENSITY ASTM D1559
6. 18 INCH CLASS 6 AGGREGATE BASE SHALL BE CALVARIUS CLASS 6, 8 INCH MAX COMPACTED TO A MIN. OF 95% OF THE THEORETICAL MAXIMUM DENSITY ASTM D1559
7. SANDWICH AND REINFORCING MAT IS 8 INCH OF HWA MATERIAL, TO 95% RELATIVE DENSITY ASTM D1559 AT 1 INCH MAX. TO 95% ABOVE OPTIMUM HUMIDITY. COMPACTING SHALL BE IN LAYERS OF 8 INCH FOR NAYE
8. 18 INCH CLASS 7 AGGREGATE BASE SHALL BE CALVARIUS CLASS 7, 8 INCH MAX COMPACTED TO A MIN. OF 95% OF THEORETICAL MAXIMUM DENSITY ASTM D1559
9. SANDWICH BINDER, 18 INCHES CLASS 8 AGGREGATE BASE COMPACTED TO 95% OF ASTM D1557 MAX DRY DENSITY
10. IMPORT MATERIAL SHALL BE OBTAINED FROM A LEGAL SITE, COMPACTED TO 95% RELATIVE DENSITY ASTM D1557

NOT FOR CONSTRUCTION

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FINISH GRADE ELEVATIONS			
POINT	STATION	OFFSET	ELEVATION
A	16+54.00	21.20' RL	146.10
B	18+54.00 BC	41.20' RL	146.80
C	18+76.42 EC	73.55' RL	149.12
D	18+76.42	74.70' RL	149.62
E	19+11.68	55.45' RL	148.02
F	19+45.67 EC	50.25' RL	146.38
G	19+76.00 BC	41.20' RL	146.81
H	19+76.00	21.20' RL	146.57

NOTES:

1. ALL STATIONS AND OFFSETS ARE TO THE "P" LINE.
2. FOR DETAILS NOT SHOWN, SEE SHEET PP-1.
3. SCARFY SUBGRADE TO A DEPTH OF AT LEAST 12 INCHES. RELATIVE COMPACTION OF AT LEAST 95 PERCENT.

CONSTRUCTION NOTES

CONSTRUCTION NOTES

② 24"x20" CONCRETE PAD, SEE DETAIL ON SHEET C-2

REVISION	DATE	COMMENTS
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DATE 6/23/78 BY SP-1

NAME DAWAB BOUZAHOUN, P.E. NVS

SECRET NO. 54870

PREPARED UNDER THE DIRECT SUPERVISION OF:

JOHN A. GAY, P.E.
ROAD COMMISSIONER

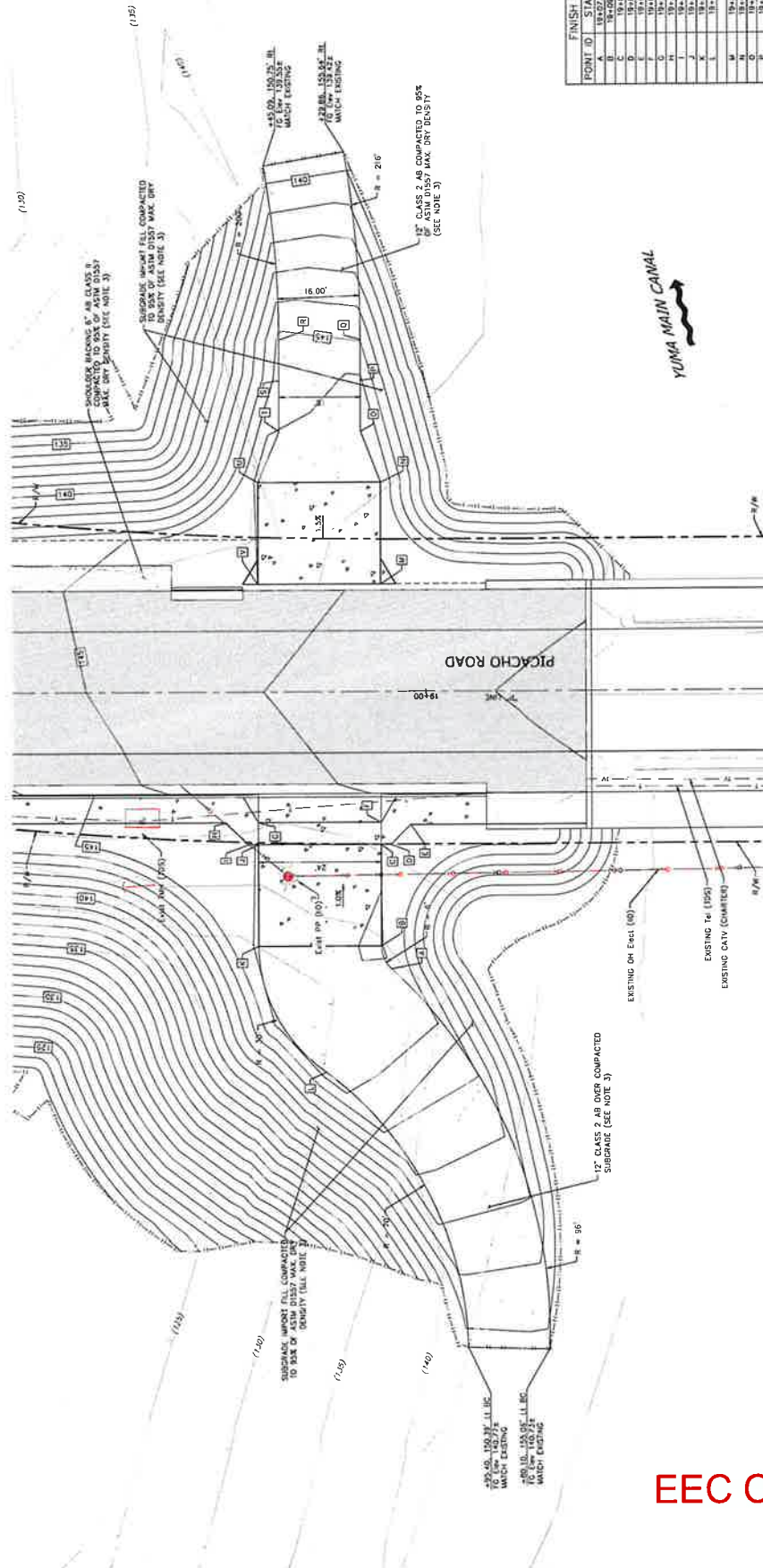


PUBLIC WORKS DEPARTMENT
COUNTY OF IMPERIAL
EL CENTRO, CALIFORNIA

PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. COUNTY PROJECT No. 5811	CONSTRUCTION DETAILS	
	REFERENCE	B-199
	C-1	of 29 Sheet

NOT FOR CONSTRUCTION

FINISH 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



POINT ID	STATION	FINISH GRADE ELEVATIONS	
		OFFSET	ELEVATION
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B	18+00.00	32.00	146.81
C	18+00.00	32.00	146.81
D	18+00.00	32.00	146.81
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X	18+00.00	32.00	146.81
Y	18+00.00	32.00	146.81
Z	18+00.00	32.00	146.81

1. ALL STATIONS AND OFFSETS ARE TO THE "P" LINE.
2. FOR DETAILS NOT SHOWN, SEE SHEET PP-1.
3. SCARITY SUBGRADE TO A DEPTH OF AT LEAST 12 INCHES AND COMPACT TO A RELATIVE COMPACTION OF AT LEAST 95 PERCENT.

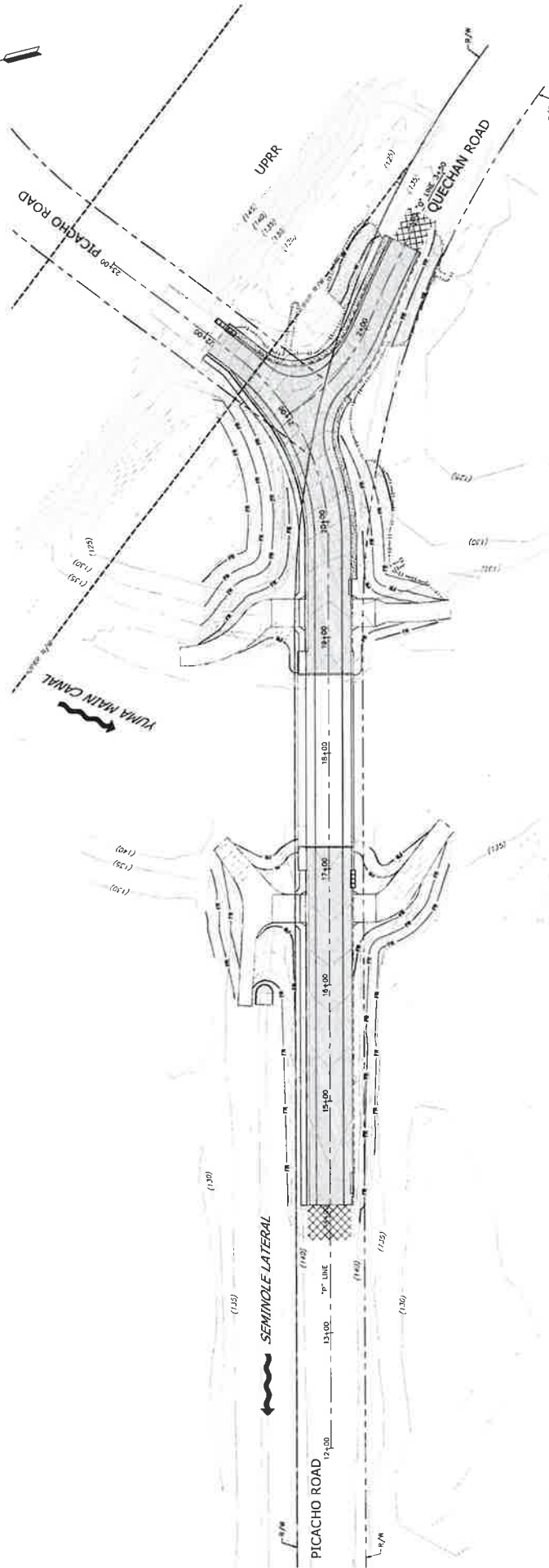
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CONSTRUCTION DETAILS

NOT FOR CONSTRUCTION

EEC ORIGINAL PKG

EROSION CONTROL LEGEND			
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STEP 2	HYDROMULCH	TACKIFIER	100 LBS/4242



NOTES

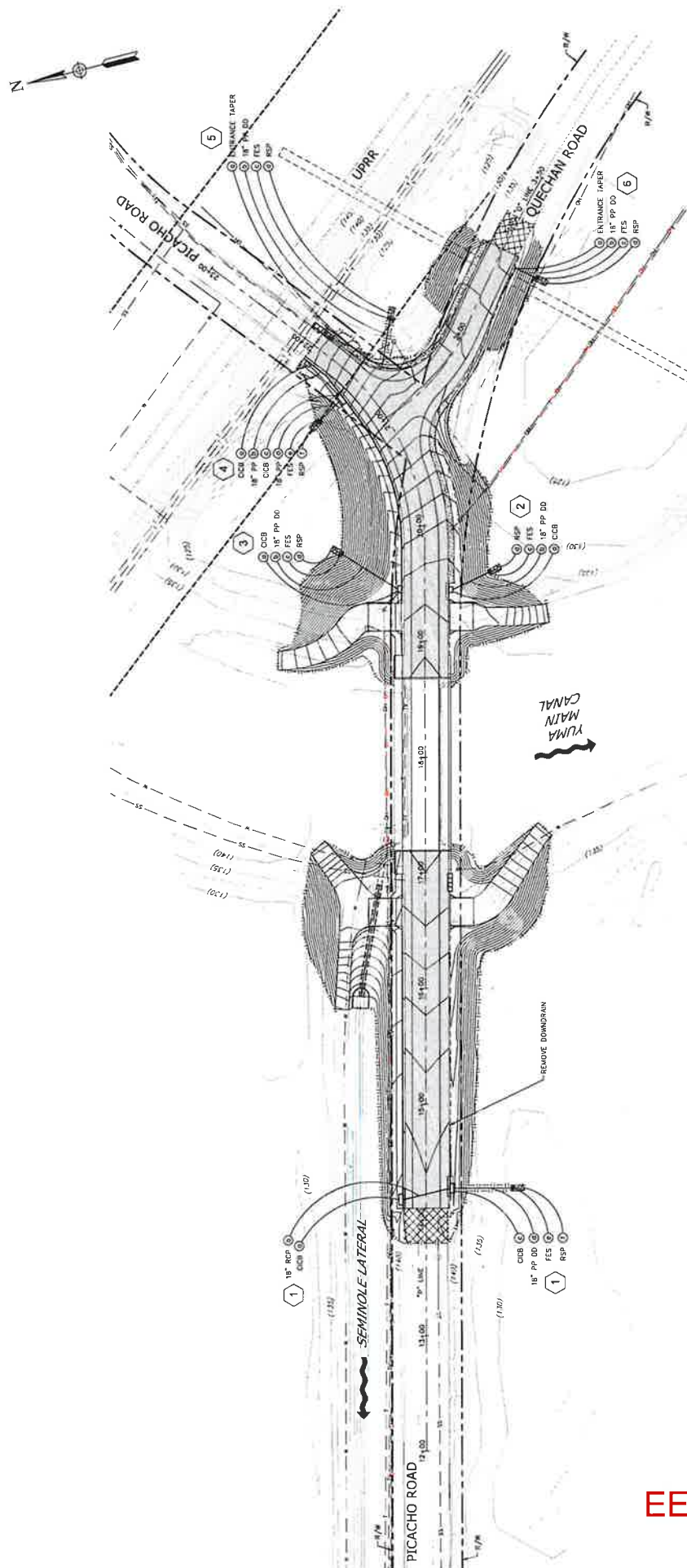
1. FOR NOTES, LEGEND AND LIST OF ABBREVIATIONS, SEE SHEET 1-1.
2. FOR FIBER ROLL DETAILS, SEE CALTRANS STANDARD PLAN 101.



EEC ORIGINAL PKG

NOT FOR CONSTRUCTION

REVISION	DATE	COMMENTS		PREPARED UNDER THE DIRECT SUPERVISION OF: DABAB BOLZAKOWSKI, P.E. No. 54870 State of California		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: JOHN A. GAY, P.E. ROAD COMMISSIONER No. 55928 State of California	PROJECT NO. 6811 COUNTY PROJECT NO. 6811	PICHACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO.	EROSION CONTROL PLAN B-189	REFERENCE EC-1	SHEET 5	OF 25



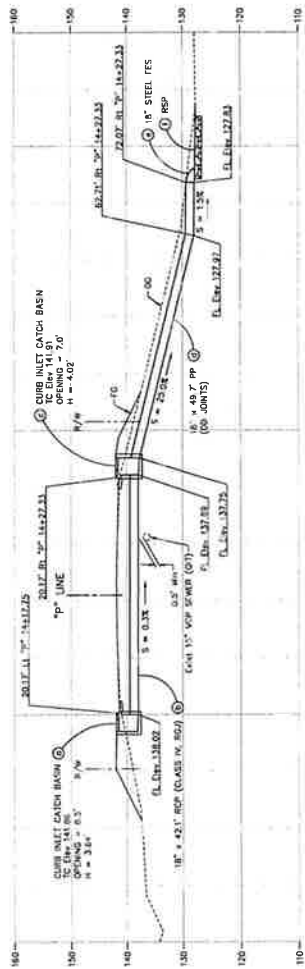
NOTES:

- NOTES:**
1. FOR NOTES, LEGEND AND LIST OF ABBREVIATIONS, SEE SHEET T-1.
 2. FOR DRAINAGE PROFILES AND DETAILS, SEE SHEET DP-1.

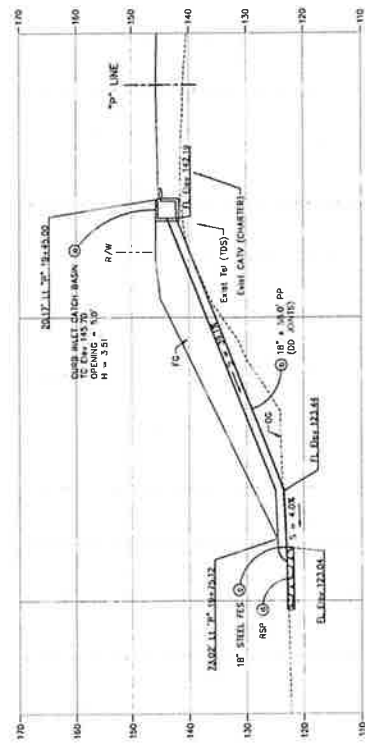
1. FOR NOTES, LEGEND AND LIST OF ABBREVIATIONS, SEE SH

REVISION	DATE	COMMENTS
 COUNTY OF IMPERIAL, CALIFORNIA E. CENTRO, CALIFORNIA DATE: 7/5/2024 PROJECT NO. 6811 PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. REFERENCE: D-1 DATE: 10/29		
COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: JOHN A. GAY, P.E. ROAD COMMISSIONER PROJECT NO. 6702B R.C.E. No. 54870 DATE: 8/20/25		
PREPARED UNDER THE DIRECT SUPERVISION OF: DAVID B. BOUTZ, JR., P.E. DATE: 8/20/25 PROJECT NO. 6811		
DATE: 7/5/2024 PROJECT NO. 6811 PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. REFERENCE: D-1 DATE: 10/29		

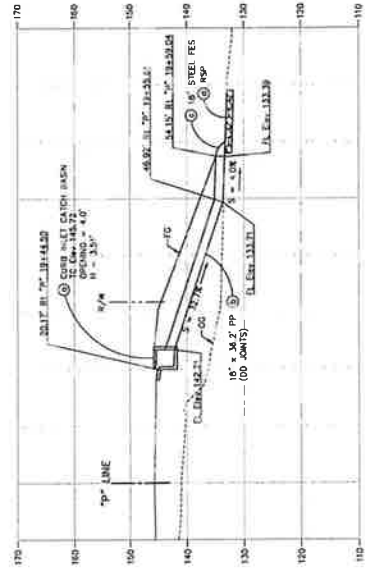
- NOTES:**
1. ALL STATIONS OF SETS AND CORRESPONDING SHOWN LEADER LINES FOR CURB INLET CATCH BASIN DETAILS, SEE CDPW Dwg No. 312.
 2. FOR CURB INLET CATCH BASIN DETAILS, SEE CDPW Dwg No. 312.
 3. CONSTRUCT LOCAL DEPRESSION AT ALL CURB INLET CATCH BASINS PER CDPW Dwg No. 312.
 4. INSTALL DRAINAGE INLET MARKER AT ALL CURB INLET CATCH BASINS PER CDPW Dwg No. 312.
 5. FOR DOWNGRAN DETAILS, SEE CALTRANS STANDARD PLAN D84A.
 6. FOR FLARED END SECTION DETAILS, SEE CALTRANS STANDARD PLAN D84A.
 7. PIPE JOINTS SHALL BE STANDARD TYPE UNLESS OTHERWISE NOTED.
 8. FOR TRENCH AND BACKFILL DETAILS, SEE CDPW Dwg No. 500.



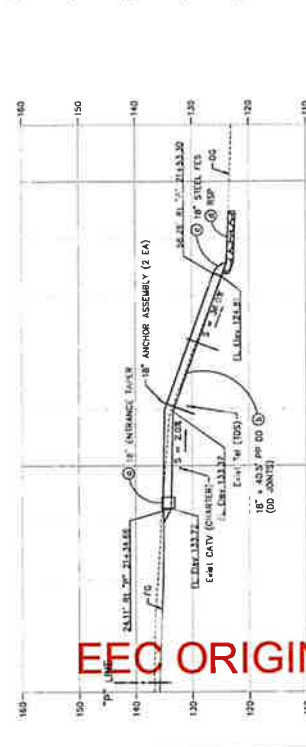
Drainage System No. 1
P 14+22.32



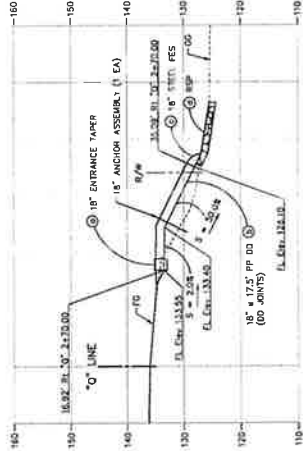
Drainage System No. 3
P 19+45.00



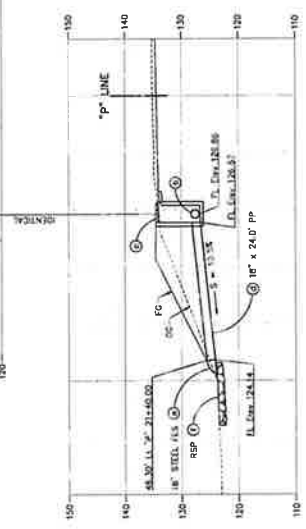
Drainage System No. 2
P 19+44.50



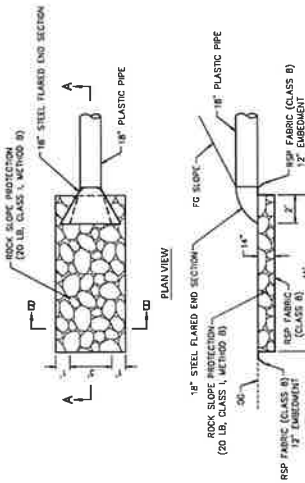
Drainage System No. 5
P 21+34.66



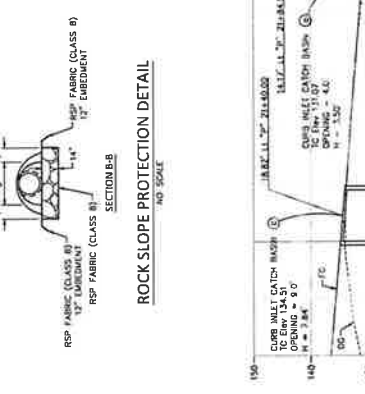
Drainage System No. 6
P 21+70.00



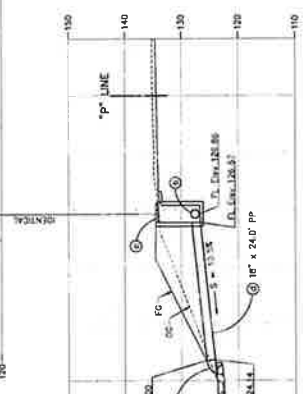
Drainage System No. 4
P 21+40.00



Section A-A



Section B-B



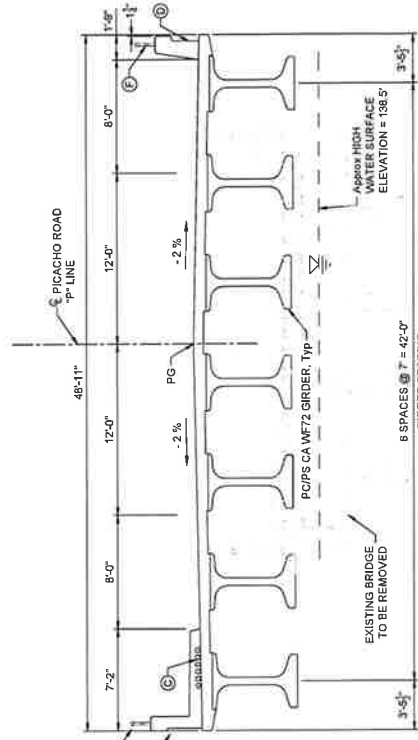
Section C-C

NOT FOR CONSTRUCTION

REVISION DATE COMMENTS		PREPARED UNDER THE DIRECT SUPERVISION OF: DANIEL BOLLAN-JAMNIN, P.E. NYS REG. NO. 14689 DATE: 8/20/22		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: JOHN A. GAY, P.E. ROAD COMMISSIONER DATE: 8/20/22		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: JOHN A. GAY, P.E. ROAD COMMISSIONER DATE: 8/20/22		PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. 6811 COUNTY PROJECT NO. 6811		DRAINAGE PROFILES REFERENCE DP-1 SHEET 11 OF 28	
-------------------------------------	--	---	--	--	--	--	--	--	--	--	--

PKG	REC'D ON	DATE	COMMENTS
 PREPARED UNDER THE DIRECT SUPERVISION OF: JAMES S. MILLER, P.E. TRAFFIC SERVICES DIRECTOR DATE <u>9/20/24</u> BY <u> </u>  APPROVED FOR CONSTRUCTION BY: JOHN R. GAY, P.E. ROAD COMMISSIONER DATE <u>9/18/24</u> BY <u> </u>			
 IMPERIAL PUBLIC WORKS DEPARTMENT COUNTY OF IMPERIAL F. CENTRO, CALIFORNIA 3d 9/2/2024 DATE AC 1/25 5/25/24 1/25 5/25/24 1/25 5/25/24 1/25 5/25/24			
PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. 58C-XXXX COUNTY PROJECT NO. 6811 REFERENCE DE-1			
TRAFFIC CONTROL & DETOUR PLAN B-159 12 29			

EC ORIGINAL PKG



TYPICAL SECTION
(EXISTING PIERS 3 THROUGH 6 SHOWN)

SCALE: 1/4" = 1'-0"

NOTES

- | | |
|-----|--|
| (A) | Existing utility to be protected in place |
| (B) | Existing utility to be relocated |
| (C) | 4" Opening for utilities |
| (D) | Concrete Barrier Type 836 |
| (E) | Concrete Barrier Type 732SW |
| (F) | Tubular Handrailing |
| (G) | Paint "YUMA MAIN (PICACHO RD)
BR NO. 585-QJXXJ"
(YEAR CONSTRUCTED) |
| (H) | Grass Cushion, see Roadway Plans |
| (I) | Concrete Barrier Type 836A |

INDEX TO BRIDGE PLANS

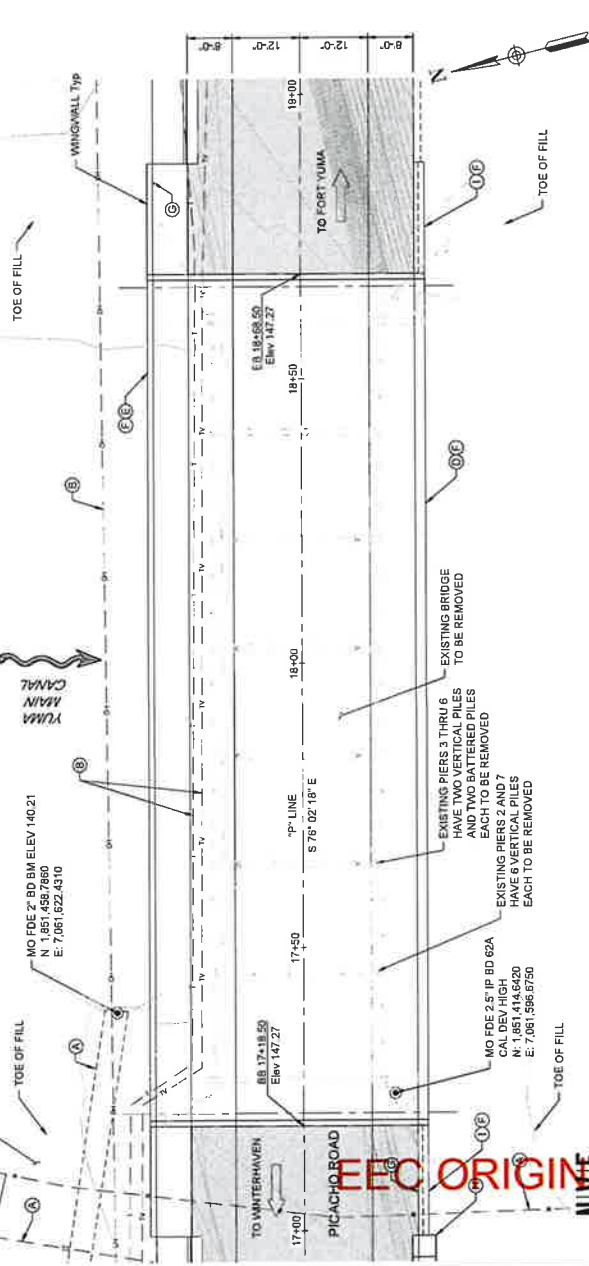
1. GENERAL PLAN
2. DECK CONTOURS
3. FOUNDATION
4. ABUTMENT 1 LAYOUT
5. ABUTMENT 2 LAYOUT
6. ABUTMENT DETAILS
7. PIER LAYOUT
8. GIRDER LAYOUT
9. PCPS WIDE FLANGE GIRDER (HARDED STRANDS)
10. PCPS WIDE FLANGE GIRDER (MISCELLANEOUS DETAILS)
11. JOINT ARMOR FOR PEDESTRIAN WALKWAYS
12. STEEL REINFORCED ELASTOMERIC BEARINGS
13. SOIL LEGEND 1 OF 2
14. SOIL LEGEND 2 OF 2
15. LOGS OF TEST BORING 1 OF 2
16. LOGS OF TEST BORING 2 OF 2

NOTES

1. THE CONTRACTOR SHALL VERIFY ALL CONTROLLING FIELD DIMENSIONS BEFORE ORDERING OR FABRICATING ANY MATERIAL.
2. THE EXISTING GLAY LINED CANAL MUST BE PROTECTED IN PLACE DURING ALL CONSTRUCTION ACTIVITIES.
3. THE CONTRACTOR MUST REMOVE THE EXISTING PILES AT THE PIERS WITHIN THE CANAL, FLUSH WITH THE EXISTING CANAL PRISM IN SUCH A WAY THAT THE CANAL, INCLUDING ITS FOUNDATION IS PROTECTED.
4. ANY MODIFICATION TO THE CANAL PRISM MUST BE SUBMITTED TO THE DISTRICT ENGINEER FOR REVIEW AND SHALL BE REVIEWED AND APPROVED BY THE BUREAU OF RECLAMATION AND YUMA COUNTY WATER USERS' ASSOCIATION PRIOR TO THE CONTRACTOR COMMENCING WORK.
5. THE APPROXIMATE HIGH WATER SURFACE ELEVATION WAS PROVIDED BY YUMA COUNTY WATER USERS' ASSOCIATION.

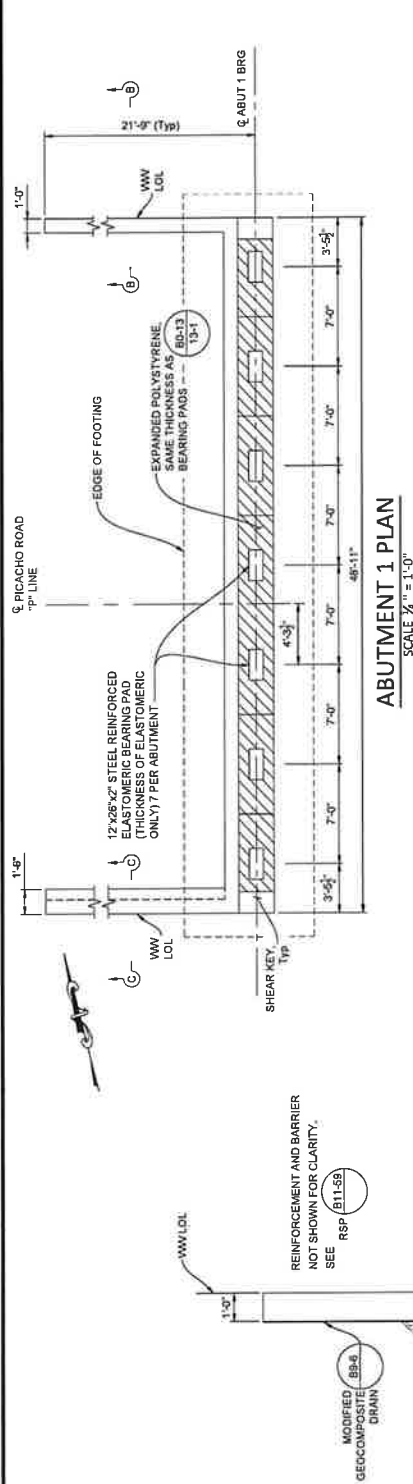
PLAN
SCALE: 1" = 10'

PLAN
SCALE: 1" = 10'

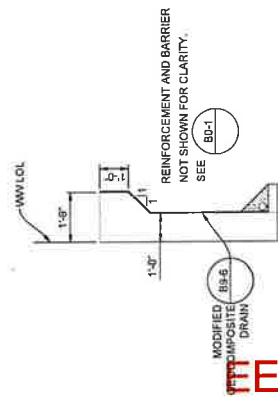


150012 AVENUE OF THE STARS, SUITE 200
SAN DIEGO, CA 92128
P. 858.353.0500
WWW.NVO.COM

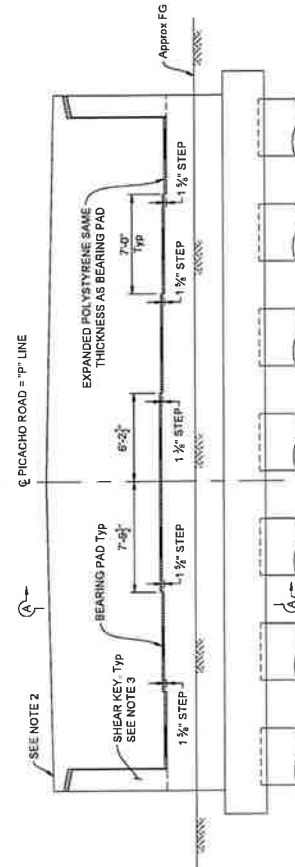
REVISION	DATE	COMMENTS
 PREPARED UNDER THE DIRECT SUPERVISION OF: DATE: _____ 54870 R.C.E. No. _____ JUAN A. GAY, P.E. BOARD COMMISSIONER 6/22/24 REC. EXP.		
 PREPARED UNDER THE DIRECT SUPERVISION OF: DATE: _____ 54870 R.C.E. No. _____ JUAN A. GAY, P.E. BOARD COMMISSIONER 6/22/24 REC. EXP.		
 COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: 6/20/28 R.C.E. No. _____ JOHN A. GAY, P.E. BOARD COMMISSIONER 9/30/23 REC. EXP.		
 COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA DATE: _____ 6/22/24 REC. EXP.		
 PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. 58C-0028 COUNTY PROJECT NO. 6811 DATE: _____ 6/22/24 REC. EXP.		
GENERAL PLAN		REFERENCE
B-199		S-1
SHEET		OF
14		20



SECTION B-B
SCALE 1/4" = 1'-0"



ABUTMENT 1 FOOTING LAYOUT
SCALE 1/4" = 1'-0"



SECTION C-C
SCALE 1/4" = 1'-0"

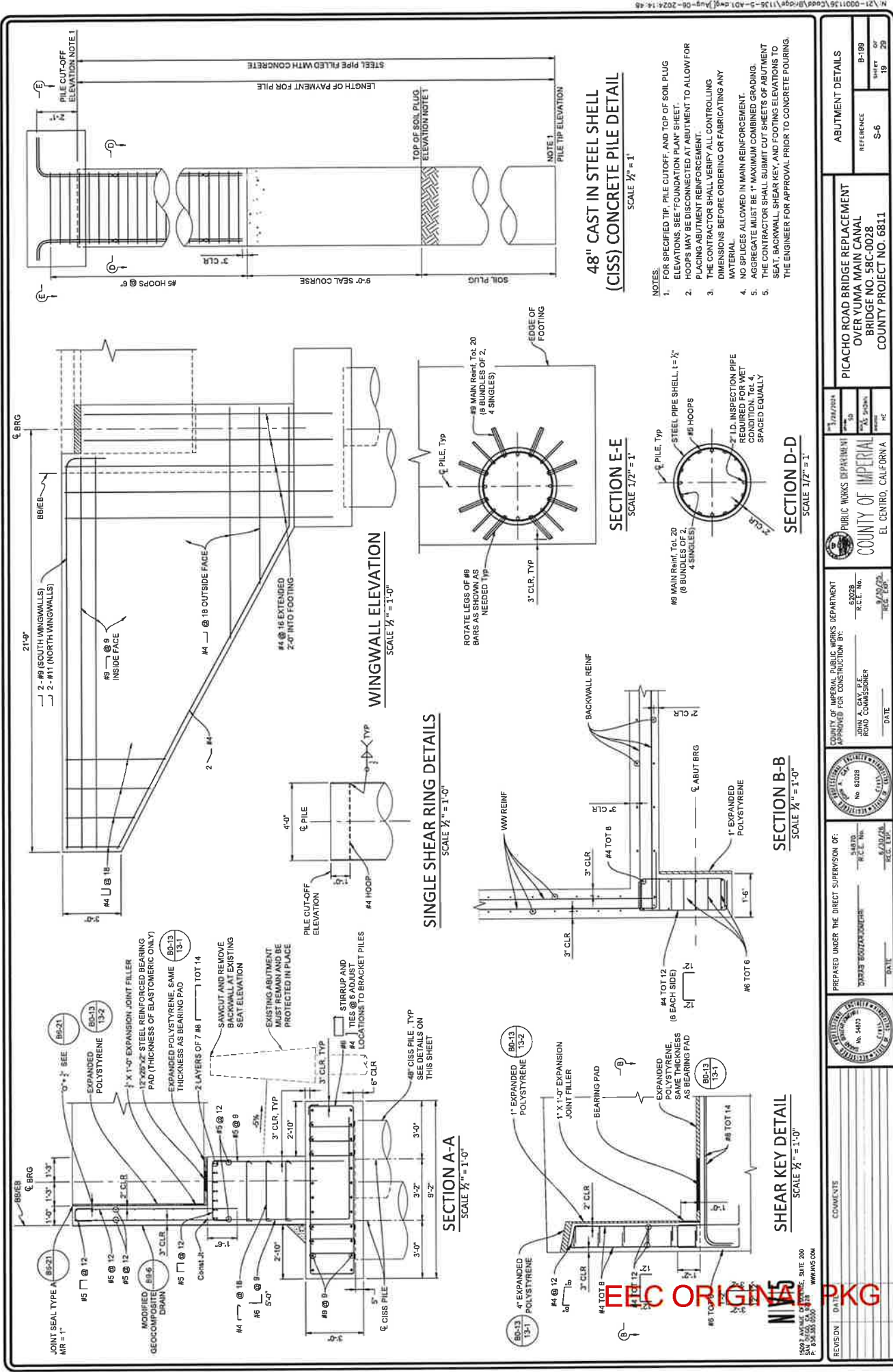
- NOTES:
1. FOR SECTION A-A SEE "ABUTMENT DETAILS" SHEET
 2. CONCRETE BARRIER NOT SHOWN FOR CLARITY
 3. FOR SHEAR KEYS, SEE "ABUTMENT DETAILS" SHEET
 4. FOR PILE DETAILS, SEE "ABUTMENT DETAILS" SHEET.
 5. THE CONTRACTOR SHALL SUBMIT CUT SHEETS OF ABUTMENT SEAT, BACKWALL, SHEAR KEY AND FOOTING TO THE ARCHITECT FOR REVIEW AND APPROVAL PRIOR TO CONCRETE POURING.

REVISION	DATE	COMMENTS		COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA	PUBLIC WORKS DEPARTMENT COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA	PROJECT NO. 58C-0028 COUNTY PROJECT NO. 6811	ABUTMENT 1 LAYOUT REFERENCE S-4

15000 AVENUE 15000
 SAN DIEGO, CA 92108
 P. 619.594.0000

15000 AVENUE 15000
 SAN DIEGO, CA 92108
 P. 619.594.0000

15000 AVENUE 15000
 SAN DIEGO, CA 92108
 P. 619.594.0000



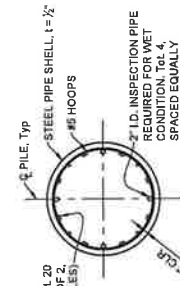
48" CAST IN STEEL SHELL
(CISS) CONCRETE PILE DETAIL

SCALE 1/2" = 1'

- NOTES:
1. FOR SPECIFIED TIP, PILE CUTOFF AND TOP OF SOIL PLUG ELEVATIONS, SEE FOUNDATION PLAN SHEET.
2. HOOPS MAY BE DISCONNECTED AT ABUTMENT TO ALLOW FOR PLACING ABUTMENT REINFORCEMENT.
3. THE CONTRACTOR SHALL VERIFY ALL CONTROLLING ANY DIMENSIONS BEFORE ORDERING OR FABRICATING ANY MATERIAL.
4. NO SPLICES ALLOWED IN MAIN REINFORCEMENT.
5. AGGREGATE MUST BE 1" MAXIMUM COMBINED GRADING.
6. THE CONTRACTOR SHALL SUBMIT CUT SHEETS OF ABUTMENT SEAT, BACKWALL, SHEAR KEY, AND FOOTING ELEVATIONS TO THE ENGINEER FOR APPROVAL PRIOR TO CONCRETE POURING.

SECTION E-E

SCALE 1/2" = 1'



SECTION D-D

SCALE 1/2" = 1'

SECTION B-B

SCALE 1/2" = 1'-0"

SINGLE SHEAR RING DETAILS

SCALE 1/2" = 1'-0"

SCALE 1/2" = 1'-0"

SECTION A-A

SCALE 1/2" = 1'-0"

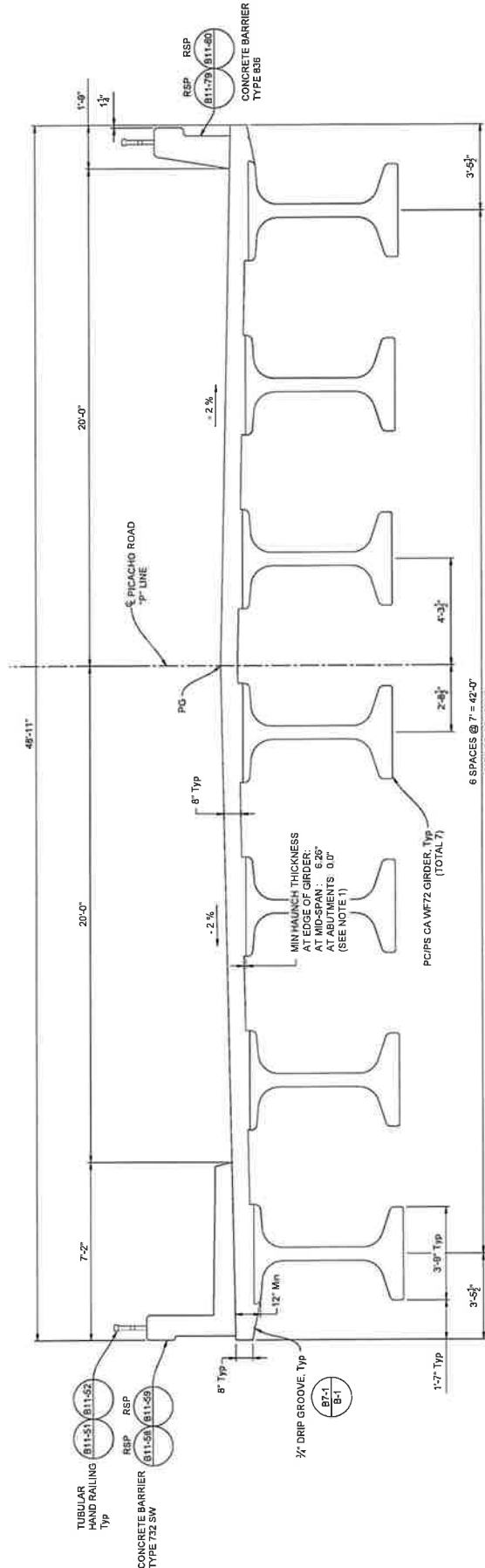
SCALE 1/2" = 1'-0"

SHEAR KEY DETAIL

SCALE 1/2" = 1'-0"

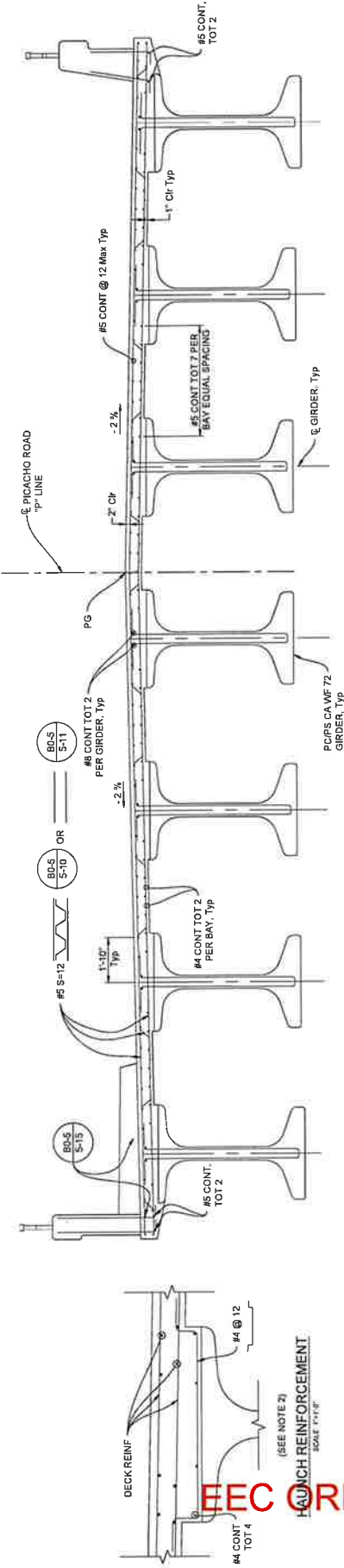
SCALE 1/2" = 1'-0"

Table with project information including: COUNTY OF IMPERIAL, PUBLIC WORKS DEPARTMENT, PROJECT NO. 6811, BRIDGE NO. 58C-0028, and various approval stamps and dates.



TYPICAL SECTION

SCALE 1/2" = 1'-0"



- NOTES:**
1. DUE TO PROFILE GRADE, MINIMUM HAUNCH DEPTH OCCURS AT THE ABUTMENTS AND MAXIMUM HAUNCH DEPTH OCCURS AT MIDSPAN. SEE "GIRDER LAYOUT" SHEET. THICKNESS DETAIL ON "GIRDER LAYOUT" SHEET.
 2. WHERE THE HAUNCH DEPTH IS 4 INCHES OR GREATER, PROVIDE HAUNCH REINFORCING AS SHOWN ON THIS SHEET.

DECK REINFORCEMENT

SCALE 1/2" = 1'-0"

COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: <u>JOHN A. GAY, P.E.</u> ROAD COMMISSIONER		COUNTY OF IMPERIAL EL CENTRO, CALIFORNIA	TYPICAL SECTION REFERENCE S-7
PREPARED UNDER THE DIRECT SUPERVISION OF: TERRY DOZAN, ENGINEER DATE: <u>8/29/22</u>		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: <u>JOHN A. GAY, P.E.</u> ROAD COMMISSIONER	TYPICAL SECTION REFERENCE S-7
COMMENTS:		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: <u>JOHN A. GAY, P.E.</u> ROAD COMMISSIONER	TYPICAL SECTION REFERENCE S-7
REVISIONS:		COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: <u>JOHN A. GAY, P.E.</u> ROAD COMMISSIONER	TYPICAL SECTION REFERENCE S-7

EEC ORIGINAL PKG

NO. 5808
DATE: 8/29/22
SCALE: 1/2" = 1'-0"

[illegible]

FIELD AND LABORATORY TESTING	
(C)	Consolidation (ASTM D 2435)
(CL)	Collapse Potential (ASTM D 5333)
(CP)	Compaction Curve (ASTM D 1557)
(CR)	Corrosivity Testing (CTM 643, CTM 422, CTM 417)
(CU)	Consolidated Undrained Triaxial (ASTM D 4767)
(CS)	Direct Shear (ASTM D 3080)
(EI)	Expansion Index (ASTM D 4829)
(M)	Moisture Content (ASTM D 2216)
(OC)	Organic Content-X (ASTM D 2974)
(P)	Permeability (CTM 220)
(PA)	Particle Size Analysis (ASTM D 422)
(PI)	Plasticity Index (AASHTO T 90) Liquid Limit (AASHTO T 89)
(PL)	Point Load Index (ASTM D 5731)
(PM)	Pressure Meter
(R)	R-Value (CTM 301)
(SE)	Sand Equivalent (CTM 217)
(SD)	Specific Gravity (AASHTO T 100)
(SL)	Shrinkage Limit (ASTM D 427)
(SW)	Swell Potential (ASTM D 4546)
(UC)	Unconfined Compression-Soil (ASTM D 2166)
	Unconfined Compression-Rock (ASTM D 2356)
(UU)	Unconsolidated Undrained Triaxial (ASTM D 2450)
(UN)	Unit Weight (ASTM D 4767)

APPARENT DENSITY OF COHESIONLESS SOILS		
Description	SPT N ₆₀ (Blows / 12 In.)	
Very Loose	0 - 5	
Loose	5 - 10	
Medium Dense	10 - 30	
Dense	30 - 50	
Very Dense	Greater than 50	

MOISTURE		
Description	Criteria	
Dry	No discernible moisture	
Molat	Moisture present, but no free water	
Wet	Visible free water	

PERCENT OR PROPORTION OF SOILS		
Description	Criteria	
Trace	Particles are present but estimated to be less than 5%	
Few	5% - 10%	
Little	15% - 25%	
Some	30% - 45%	
Mostly	50% - 100%	

PARTICLE SIZE		
Description	Size (In.)	
Boulder	Greater than 12	
Cobble	3 - 12	
Gravel	Coarse	3/4 - 3
	Fine	1/8 - 3/4
	Coarse	1/16 - 1/8
Sand	Medium	1/64 - 1/16
	Fine	1/300 - 1/64
Silt and Clay	Less than 1/300	

[illegible]

REVISION

DATE COMMENTS

(1) This LOTB sheet (Boring Record) was prepared in accordance with the California Soil and Rock Logging, Classification and Presentation Manual (2022).

PLAN

SCALE: 1"=40'

YUMA MAIN CANAL

19+00 19+20 19+40 19+60 19+80 20+00

PLAN

SCALE: 1"=40'

R-21-001

R-21-002

LOG OF TEST BORINGS 1 OF 2

PICACHO ROAD BRIDGE REPLACEMENT OVER YUMA MAIN CANAL BRIDGE NO. 58C-0028 COUNTY PROJECT NO. 6811

REFERENCE S-15

B-189

DATE 28

BY 29

HE

HE

HE

HE

HE

HE

HE

PROFILE

SCALE: 1"=10'

7.5

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50

75

100

140

180

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260

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340

380

420

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1000

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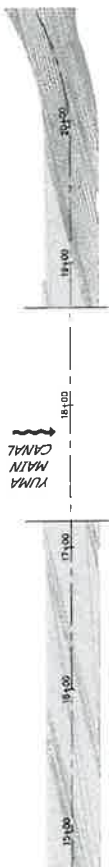
6040

BENCH MARK

See Civil Plans.
All stations and offsets shown on
this plan are approximate.

NOTES

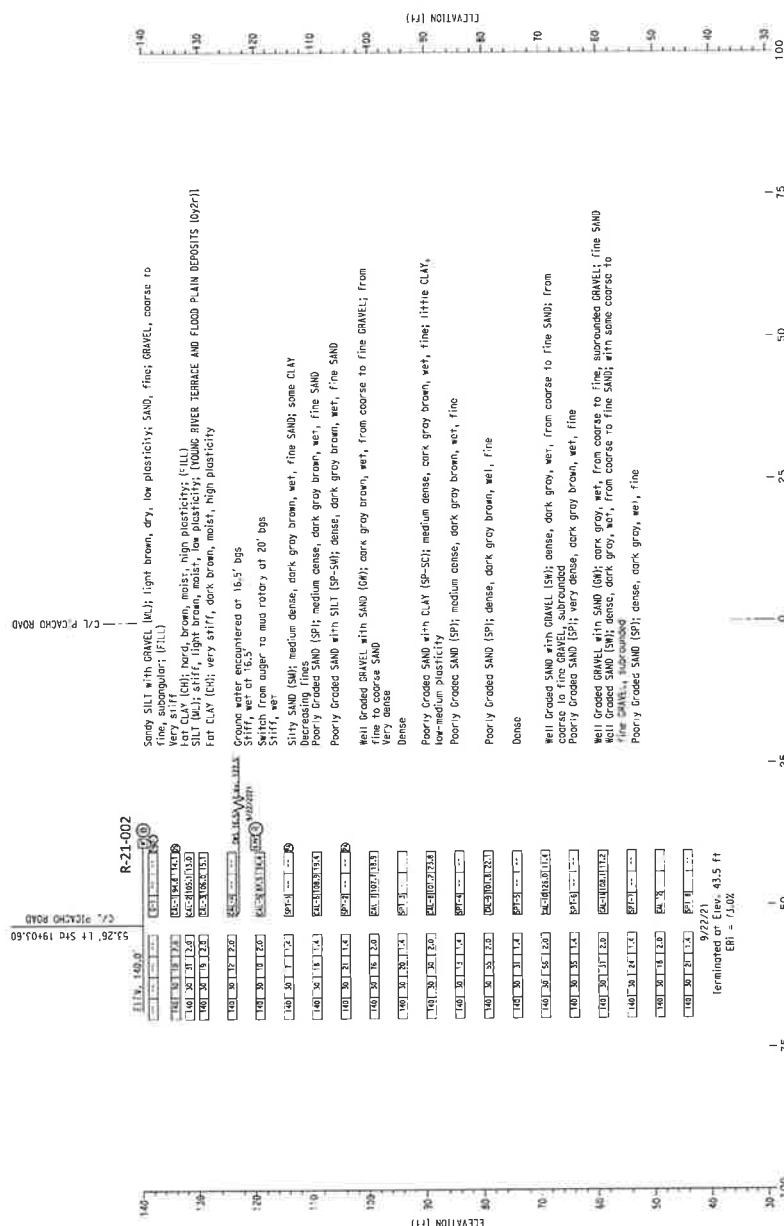
(1) This LOTB sheet (Boring Record)
includes data from the following
California State and Rock Logging,
Classification and Presentation
Manual (2022).



R-21-001

R-21-002

PLAN
SCALE: 1"=40'



PROFILE
SCALE: 1"=10'

100%
DATE: 10/10/2023
BY: J. L. S. 1903.03.09
P. 100-30-0007

REVISION	DATE	COMMENTS



PREPARED UNDER THE DIRECT SUPERVISION OF:
CARL FRANCISCO HENDERSON
DATE: 9/22/21
Elev. 43.5 ft
Elev. = 110.02



COUNTY OF IMPERIAL
APPROVED FOR CONSTRUCTION BY:
JOHN A. CLAY, P.E.
ROAD COMMISSIONER
DATE: 9/22/21
Elev. 43.5 ft
Elev. = 110.02



PICACHO ROAD BRIDGE REPLACEMENT
OVER YUMA MAIN CANAL
BRIDGE NO. 58C-0028
COUNTY PROJECT NO. 6811

LOG OF TEST BORINGS 2 OF 2	
REFERENCE	B-189
S-16	28
29	29

COMMENT LETTERS

EEC ORIGINAL PKG

Luis Bejarano

From: Jill McCormick <historicpreservation@quechantribe.com>
Sent: Thursday, October 17, 2024 4:26 PM
To: Kamika Mitchell; Antonio Venegas; Ashley Jauregui; Jolene Dessert; Margo Sanchez; Belen Leon-Lopez; Monica Soucier; Jesus Ramirez; John Hawk; Miguel Figueroa; Rebecca Terrazas-Baxter; Rosa Lopez; Bari Bean; Jeff Lamoure; Jorge Perez; Alphonso Andrade; Marco Topete; Sheila Vasquez-Bazua; Andrew Loper; David Lantzer; Carlos Yee; Veronica Atondo; John Gay; rkelly@icso.org; Fred Miramontes; Robert Benavidez; dvargas@iid.com; Planning@yumaaz.gov; kimberly.dodson@dot.ca.gov; roger.sanchez-rangel@dot.ca.gov; heather.brashear@wildlife.ca.gov; marcuscuero@campo-nsn.gov; jmesa@campo-nsn.gov; Tribal Secretary
Cc: Michael Abraham; Diana Robinson; Jim Minnick; Diana Robinson; Rocio Yee; Luis Bejarano; Aimee Trujillo; Jenyssa Gutierrez; Kayla Henderson; Marsha Torres; Olivia Lopez; Valerie Grijalva
Subject: RE: [EXTERNAL]:Initial Study (IS) #24-0037- REQUEST FOR COMMENTS

CAUTION: This email originated outside our organization; please use caution.

Good afternoon,
Pursuant to AB52 and PRC 21080.3.1 (b), the Historic Preservation Office of the Fort Yuma-Quechan Indian Tribe is requesting consultation for the Picacho Road Bridge Project. Feel free to reach out with any questions regarding this request.

*Thank you,
H. Jill McCormick, M.A.*

Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521



From: Kamika Mitchell <kamikamitchell@co.imperial.ca.us>
Sent: Wednesday, October 16, 2024 2:02 PM

EEC ORIGINAL PKG

Luis Bejarano

From: Robert Urena
Sent: Thursday, October 31, 2024 10:53 AM
To: Rocio Yee; Luis Bejarano; John Gay; historicpreservation@quechantribe.com
Cc: Michael Abraham; Diana Robinson
Subject: RE: IS 24-0037 - IID COMMENT LETTER

Good Morning Rocio,

Thank you for the update!

Robert “Bobby” Ureña III, PE
Principal Engineer
Imperial County Department of Public Works
155 S. 11th St, El Centro, CA 92243
Phone: (442) 265-1818 Ext. 1814
Email: roberturena@co.imperial.ca.us

From: Rocio Yee <rociyee@co.imperial.ca.us>
Sent: Thursday, October 31, 2024 10:50 AM
To: Robert Urena <RobertUrena@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; historicpreservation@quechantribe.com
Cc: Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>
Subject: RE: IS 24-0037 - IID COMMENT LETTER

Good morning,

I hope this message finds you well.

I wanted to provide you with an update regarding our outreach for the **Picacho Road Bridge Replacement project, (IS#24-0037)**. As of now, we have not received any comment letters apart from IID.

Additionally, I reached out to Jill McCormick from the Quechan Indian Tribes concerning the AB52 Consultation. During our initial phone conversation, He indicated that they are not ready to meet at this time; however, they expressed a strong interest in staying informed as the project progresses.

Please note that the comment period officially closed on **October 30**, and the **AB52** tribal consultation period will conclude on **November 15**.

Following these timelines, we will be able to schedule a meeting with the Environmental Evaluation Committee (EEC). I will keep you updated on the meeting date once it is confirmed.

Thank you for your attention to these matters, and please let me know if you have any questions or need further information.

Best regards,

EEC ORIGINAL PKG



Jim Minnick
DIRECTOR

Imperial County Planning & Development Services Planning / Building

RECEIVED

By Imperial County Planning & Development Services at 11:19 am, Nov 01, 2024

**October 16, 2024
REQUEST FOR REVIEW
AND COMMENTS**

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

To: County Agencies	State Agencies/Other	Cities/Other
☒ County Executive Office – Miguel Figueroa/ Rosa Lopez/Rebecca Terrazas- Baxter/ Bari Smith Bean	☒ IC Sheriff's Office – Ryan Kelley/ Fred Miramontes/ Robert Benavidez	☒ IID – Donald Vargas
☒ Public Works – Carlos Yee/John Gay/ Veronica Atondo	☒ Board of Supervisors – John Hawk- District 5	☒ IC Fire/OES Office – Andrew Loper/ David Lantzer
☒ Fort Yuma- Quechan Indian Tribe – Jordan D. Joaquin/ Frank L. Reece	☒ Ag. Commissioner – /Margo Sanchez/Antonio Venegas/ Ashley Jauregui/ Jolene Jauregui	☒ EHS – Jeff Lamoure/Jorge Perez/Sheila Vasquez/Alphonso Andrade/Marco Topete
☒ City Of Yuma Dept. Of Comm. Dev./Director- Alyssa Linville	☒ Campo Band Of Mission Indians - Marcus Cuero/Jonathon Mesa	☒ APCD – Monica Soucier/Belen Leon/Jesus Ramirez
☒ Caltrans, District 11-Kimberly Dotson/ Roger Sanchez	☒ Dept. Of Fish & Wildlife / Habitat Conservation / Cannabis Program- Heater Brashear	

From: Luis Bejarano Planner // Rocio Yee Planner I - (442) 265-1736 or luisbejarano@co.imperial.ca.us & rocioyee@co.imperial.ca.us

Project ID: Initial Study (IS) #24-0037

Project Location: Picacho Rd, Winterhaven, CA 92283

Project Description: The applicant intends to replace the existing Picacho bridge which leads into the Townsite of Winterhaven, due to cracking and outliving its useful life. The existing timber bridge must be replaced to support commerce, continue access to the Quechan Reservation and the Bard community, as well as provide a safer crossing of the Yuma Main Canal. Therefore, Imperial County Department of Public Works has requested that an Initial Study be prepared to environmentally assess potential impacts.

Applicants: Imperial County Department of Public Works

Comments due by: **October 30th 2024 at 5:00PM**

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

Name: Antonio Venegas Signature: Antonio Venegas Title: Ag. Biologist/Standards Spec. IV

Date: 10/30/2024 Telephone No.: 442-265-1486 E-mail: antoniovenegas@co.imperial.ca.us

LB/R/KMS:\Clerical\Clerical Forms\Request for Comments Templates\Request for Comments .docx



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October 21, 2024

RECEIVED

By Imperial County Planning & Development Services at 4:07 pm, Oct 21, 2024

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Picacho Road Bridge at Yuma Main Canal Replacement Project; IS #24-0037

Dear Mr. Bejarano:

On October 16, 2024, the Imperial Irrigation District received from the Imperial County Planning and Development Services Department, a request for agency comments on the Picacho Road Bridge at Yuma Main Canal replacement project; Initial Study No. 23-0037. The Imperial County Public Works Dept. proposes to replace the existing bridge at Picacho Road over the Yuma Main Canal, leading into the townsite of Winterhaven, California; with a new precast prestressed concrete girder bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The project includes the demolition, removal and disposal of the existing bridge.

The IID has reviewed the application and has the following comments:

1. The project will be impacting an existing overhead distribution line (A-66 Circuit 7.2/12.5kV) in the immediate project area. Please note the line currently is serving various customers in the area. An IID Encroachment Permit (see Comment No. 7) will be required for the project with all approved pertinent plans, profiles, construction plans with existing and proposed construction easements for IID to review and approve.
2. For any modification to the existing overhead distribution lines, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com. to initiate the customer service application process. In addition to submitting a formal application (available at <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance

EEC ORIGINAL PKG

documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project.

3. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
4. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.
5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.
6. The applicant will be required to bear all costs associated with acquisition of land, rights of way, easements, and the relocation and/or realignment of IID infrastructure deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.
7. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.
8. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the IID website <https://www.iid.com/about-iid/departments-directory/real-estate>. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
9. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical

transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

10. When a project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, and determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

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

Respectfully,



Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Michael P. Kemp – Superintendent General, Fleet & Compliance Services
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

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AIR POLLUTION CONTROL DISTRICT



October 25, 2024

Mr. Jim Minnick
Planning Director
801 Main Street
El Centro, CA 92243

RECEIVED

By Imperial County Planning & Development Services at 2:44 pm, Oct 31, 2024

SUBJECT: Initial Study 24-0037 Picacho Bridge – Imperial County Department of Public Works

Dear Mr. Minnick,

The Imperial County Air Pollution Control District (Air District) thanks you for the opportunity to review and comment on Initial Study (IS) 24-0037 proposing the replacement of the existing Picacho Bridge (Project). The proposed project would be along Picacho Rd. in Winterhaven, spanning over the Yuma Main Canal and also identified with Assessor's Parcel Number 056-600-011.

The Initial Study determined the Air Quality impacts would remain below significant levels and included a summary CalEEMod report in Appendix A. While CalEEMod is the Air District's approved modeling software, the Air District is unable to comment on the CalEEMod results as the summary report does not lend itself to review of the modeling inputs, a detailed report would be more suited to an in-depth review. However, the Air District can concur with the Less Than Significant impact determination as the type and size of the project is consistent with projects that remain below significant impact levels. The concurrence is also further reinforced as the IS also explicitly acknowledges project compliance with the Air District's Regulation VIII, a collection of rules designed to maintain fugitive dust emissions below 20% visual opacity. The Air District reminds the applicant the project must comply with all Air District rules and regulations including Reg VIII.

The Air District also reminds the applicant that combustion equipment such as generators must either be registered with the California Air Resources Board's (CARB) Portable Equipment Registration Program (PERP) or it may require an Air District permit. Should combustion equipment not be PERP registered the applicant should submit an application for engineering review of the equipment to determine permitting requirements.

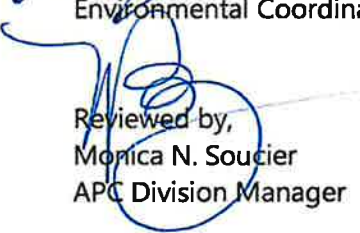
The Air District would like note that the IS states "will not exceed ICAPACD construction thresholds as summarized below in Table 3", however, Table 3 uses the heading "SCAQMD Significance Thresholds," however, the thresholds in the table are consistent with Air District

For your convenience, the Air District's Rules and Regulations can be found online for review at <https://apcd.imperialcounty.org/rules-and-regulations/>. Please contact our office at (442) 265-1800 if you have any additional questions or concerns.

Sincerely,



Ismael Garcia
Environmental Coordinator II



Reviewed by,
Monica N. Soucier
APC Division Manager

COUNTY EXECUTIVE OFFICE

Miguel Figueroa
County Executive Officer
miguelfigueroa@co.imperial.ca.us
www.co.imperial.ca.us



County Administration Center
940 Main Street, Suite 208
El Centro, CA 92243
Tel: 442-265-1001
Fax: 442-265-1010

RECEIVED

By Imperial County Planning & Development Services at 7:14 am, Nov 06, 2024

November 5, 2024

TO: Luis Bejarano, Planning and Development Services Department

FROM: Rosa Lopez, Executive Office

SUBJECT: Request for Comments – Picacho Road Bridge Project, IS #24-0037

The County of Imperial Executive Office is responding to a request for comments: Picacho Road Bridge Project, IS #24-0037. The Executive Office would like to inform of conditions and responsibilities of the applicant request a building permit for the project. The following conditions will be written into the CUP, but not limited to:

- **Sales Tax Guarantee.** The permittee is required to have a Construction Site Permit reflecting the project site address, allowing all eligible sales tax payments are allocated to the County of Imperial, Jurisdictional Code 13998. The permittee will provide the County of Imperial a copy of the California Department of Taxation and Fee Administration (CDTFA) account number and sub-permit for its contractor and subcontractors (if any) related to the jobsite. Permittee shall provide in written verification to the County Executive Office that the necessary sales and use tax permits have been obtained, prior to the issuance of any grading permits and subsequently continue throughout the permitting process.

Should there be any concerns and/or questions, do not hesitate to contact me.

Luis Bejarano

From: Luis Bejarano
Sent: Tuesday, January 14, 2025 8:19 AM
To: Robert Urena; Scott.Molloy@nv5.com
Cc: Rocio Yee; Diana Robinson; Michael Abraham; Darab.Bouzarjomehri@nv5.com; Mehrnoush.Yavary@nv5.com; eric.fuss@nv5.com; historicpreservation@quechantribe.com
Subject: IS 24-0037- CALTRANS COMMENTS

Good morning Robert,

Please see the below email from **Caltrans** with comments on the **Picacho Bridge** replacement project.

Feel free to share any questions you may have.
Thank you!



Luis Bejarano
Planner I

Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243
luisbejarano@co.imperial.ca.us
Phone (442) 265-1736

From: Sanchez Rangel, Rogelio@DOT <roger.sanchez-rangel@dot.ca.gov>
Sent: Monday, January 13, 2025 11:46 AM
To: Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>
Subject: RE: Initial Study (IS) #24-0037- REQUEST FOR COMMENTS

CAUTION: This email originated outside our organization; please use caution.

Hi Kamika and Luis,

Caltrans has general comments regarding the Picacho Bridge Replacement.

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Thank you,

Rogelio Sanchez

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ATTACHMENT “E” – COMMENT LETTERS



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March 6, 2025

RECEIVED

By Imperial County Planning & Development Services at 8:18 am, Mar 06, 2025

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: NOI for the Preparation of an MND for the Picacho Road Bridge at Yuma Main Canal Replacement Project; IS #24-0037

Dear Mr. Bejarano:

On March 5, 2025, the Imperial Irrigation District received from the Imperial County Planning and Development Services Department, the Notice of Intent for the preparation of a mitigated negative declaration for the Picacho Road Bridge at Yuma Main Canal replacement project; Initial Study No. 24-0037. The Imperial County Public Works Dept. proposes to replace the existing bridge at Picacho Road over the Yuma Main Canal, leading into the townsite of Winterhaven, California; with a new precast prestressed concrete girder bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The project includes the demolition, removal and disposal of the existing bridge.

The IID has reviewed the IS/MND and found that the comments provided in the October 21, 2024 district letter (see attached) continue to apply.

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

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Joanna Smith-Hoff – Deputy General Counsel
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



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October 21, 2024

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Picacho Road Bridge at Yuma Main Canal Replacement Project; IS #24-0037

Dear Mr. Bejarano:

On October 16, 2024, the Imperial Irrigation District received from the Imperial County Planning and Development Services Department, a request for agency comments on the Picacho Road Bridge at Yuma Main Canal replacement project; Initial Study No. 23-0037. The Imperial County Public Works Dept. proposes to replace the existing bridge at Picacho Road over the Yuma Main Canal, leading into the townsite of Winterhaven, California; with a new precast prestressed concrete girder bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The project includes the demolition, removal and disposal of the existing bridge.

The IID has reviewed the application and has the following comments:

1. The project will be impacting an existing overhead distribution line (A-66 Circuit 7.2/12.5kV) in the immediate project area. Please note the line currently is serving various customers in the area. An IID Encroachment Permit (see Comment No. 7) will be required for the project with all approved pertinent plans, profiles, construction plans with existing and proposed construction easements for IID to review and approve.
2. For any modification to the existing overhead distribution lines, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com. to initiate the customer service application process. In addition to submitting a formal application (available at <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance

documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project.

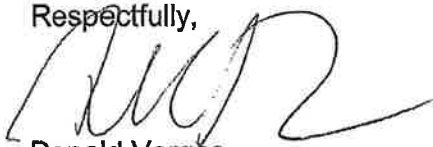
3. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
4. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.
5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.
6. The applicant will be required to bear all costs associated with acquisition of land, rights of way, easements, and the relocation and/or realignment of IID infrastructure deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.
7. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.
8. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the IID website <https://www.iid.com/about-iid/departments-directory/real-estate>. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
9. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical

transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

10. When a project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, and determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

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

Respectfully,



Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Michael P. Kemp – Superintendent General, Fleet & Compliance Services
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



RECEIVED

By Imperial County Planning & Development Services at 4:45 pm, Apr 09, 2025

April 9, 2025

Luis Bejarano
Planner I
Imperial County Planning and Development Services Department
801 Main Street
El Centro, CA, 92243

Dear Mr. Bejarano:

PICACHO ROAD BRIDGE REPLACEMENT PROJECT (PROJECT)
MITIGATED NEGATIVE DECLARATION (MND)
SCH# 2025030216

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from Imperial County Planning and Development Services Department (ICPDS) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may

¹ 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.

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

Proponent: Imperial County Public Works Department

Objective: The objective of the Project is to replace the existing Picacho Bridge, which has outlived its useful life, with a modern bridge. Primary Project activities include removal of portions of the existing bridge, placement of a concrete girder bridge, land clearing, tree and vegetation removal, grading and excavation, drainage, utilities and sub-grade, and paving.

Location: The project is located on the Picacho Road Bridge over the Yuma Main Canal, along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates latitude 32.7358, longitude -114.6241. The project site is north of Interstate 8 and 0.6 miles east of First Street.

Timeframe: Project construction is estimated to be over eight months.

COMMENTS AND RECOMMENDATIONS

CDFW is concerned there is a lack of appropriate biological resource surveys and supporting documentation provided in the MND, and therefore it is unclear how the proposed mitigation measures will be able to reduce the Project's potentially substantial adverse effect on biological resources to less than significant with mitigation incorporated. The mitigation measures currently proposed in the MND require surveys to be conducted to be able to identify and quantify the biological resources that will be impacted by the Project. Without the environmental baseline adequately evaluated, impacts to biological resources are not identified and appropriate mitigation measures cannot be formed. CDFW notes that baseline surveys should have already been conducted and included in the environmental document, and appropriate mitigation for on-site resources should have been included in the MND, as deferment does not allow the development of effective mitigation measures.

CDFW offers the comments and recommendations below, including those in Attachment A, to assist ICPDS in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Environmental Setting and Related Impact Shortcoming

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

COMMENT 1:

Section: IV Biological Resources, Page 25

Issue: The MND has not accurately described or fully established the biological resources present on-site, limiting the CEQA Lead Agency's and CDFW's ability to analyze the Project's potential impacts, and evaluate the effectiveness of the proposed avoidance, minimization, and/or mitigation measures on candidate, sensitive, or special status species. In addition, the MND states impacts to these species will be less than significant with mitigation incorporated. The MND does not identify the significant impacts that required mitigation measures to be proposed.

Specific impact: There is a discrepancy in the number of general reconnaissance biological surveys conducted – the Summary of the Natural Environment Study in Appendix B states that two surveys were conducted, but Section 2.2.1 (Survey Methodologies) lists three survey dates. Neither the MND nor the Natural Environment Study in Appendix B describe the survey methods and no species-focused surveys were conducted. Without conducting surveys that follow CDFW guidance and protocol, potential Project impacts to candidate, sensitive, or special status species may be mischaracterized, resulting in avoidable, unminimized, or unmitigated impacts not identified or analyzed by the MND. If levels of significance cannot be accurately established, neither the CEQA Lead Agency nor CDFW can adequately determine if the proposed mitigation measures truly reduced impacts to a less than significant level.

Furthermore, the CEQA checklist in the MND show that several areas under Biological Resources are checked as Less Than Significant with Mitigation Incorporated, and Appendix B states, "No impacts are expected with avoidance and minimization efforts." If Project impacts are significant to levels that require mitigation, then those significant impacts should be identified in the MND, and the proposed mitigation measures should describe how impact significance will be reduced.

Why impact would occur: The MND and accompanying Natural Environment Study do not have sufficient information on whether the Project site includes suitable habitat for or if the Project has potential impacts to the 10 botanical species and 37 zoological species listed in the Natural Environment Study, or other present biological resources.

Evidence impact would be significant: Per CEQA Appendix G (Evaluation of Environmental Impacts), which is reiterated on page 18 of the MND, the explanation of each issue should identify the significance criteria or threshold used to evaluate each question and the mitigation measure identified to reduce the impact to less than significance.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

To reduce impacts to less than significant: CDFW recommends that ICPDS conduct species-focused surveys per CDFW's guidance and protocols (<https://wildlife.ca.gov/Conservation/Survey-Protocols>) and incorporate the results and CDFW's additional comments, as detailed below, into the MND.

COMMENT 2:

Section IV Biological Resources, Page 25

Issue: No plant surveys were conducted following CDFW's survey protocol for special-status native plant populations and natural communities. The general reconnaissance biological surveys were conducted outside of several special-status plants' bloom periods. Also, neither the MND nor Natural Environment Study in Appendix B include measures to avoid, minimize, or mitigate impacts to any special-status plant species, should they be found on the Project site during construction.

Specific impact: The general reconnaissance biological surveys conducted on November 5, 2022, August 8, 2024, and August 9, 2024, are outside the bloom period for six of the ten special status-species listed in the Natural Environment Study. Per the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018), botanical field survey visits should be spaced throughout the growing season and multiple visits to the project area are usually required to capture the floristic diversity at a level necessary to determine the presence of special-status plant species.

Why impact would occur: The three general reconnaissance biological surveys do not follow the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018), and thus may not provide adequate baseline conditions to identify and evaluate impacts to special-status species. If any special-status plant species are found on the project site during construction, no avoidance, minimization, or mitigation measures are provided in the MND to ensure that impacts are reduced to less than significant levels.

The *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018) state that botanical field

surveys in the field should be conducted at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting. Six of the ten special-status species, some of which are annual species, listed in the Natural Environment Study have bloom periods outside of the November and August months: Giant Spanish needle (*Palafoxia arida* var. *gigantea*) has a bloom period of February to May; Saguaro (*Carnegiea gigantea*) has a bloom period of May to June; Wiggin's croton (*Croton wigginsii*) has a bloom period of March to May; Harwood's milk vetch (*Astragalus insularis* var. *harwoodii*) has a bloom period of January to May; Narrow leaf sandpaper plant (*Petalonyx linearis*) has a bloom period of March to May; and Desert beardtongue (*Penstemon pseudospectabilis* ssp. *Pseudospectabilis*) has a bloom period of January to May (Calflora, 2025).

Evidence impact would be significant: Sensitive plant species are listed under CESA as threatened, or endangered, or proposed candidates for listing; designated as rare under the Native Plant Protection Act; or plants that otherwise meet the definition of rare, threatened, or endangered species under CEQA. Plants constituting California Rare Plant Ranks 1A, 1B, 2A, and 2B generally meet the criteria of a CESA-listed species and should be considered as endangered, rare, or threatened species for the purposes of CEQA analysis. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Fish and Game Code Sections 1900–1913 includes provisions that prohibit the take of endangered and rare plants from the wild and a salvage requirement for landowners.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure (MM) BIO-4:

To reduce impacts to less than significant: CDFW recommends botanical field surveys following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018) be conducted annually prior to the start of construction by qualified personnel. One botanical field survey may not be sufficient to detect plants that are not evident and identifiable every year. CDFW recommends MM BIO-4 Pre-Construction Plant Surveys, listed in Attachment A, to be incorporated into the MND.

COMMENT 3:

Section IV Biological Resources, Page 25

Issue: CDFW is concerned regarding the MND's analysis of impacts to western burrowing owl (*Athene cunicularia hypugaea*). Both the MND and Natural Environment Study state that western burrowing owl was not observed during the survey(s) on the project site, but no details are provided on how the survey(s) was

conducted. As of October 25, 2024, the western burrowing owl is a candidate species for listing under CESA.

Specific impact: Focused western burrowing owl surveys were not conducted following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012). In addition, the MND and Natural Environment Study are not clear on if western burrowing owl was found outside of the biological study area but within the proposed environmentally sensitive area or if only potentially suitable habitat was present. While the Project site and surrounding areas are heavily traveled, western burrowing owls have high site fidelity and a high potential to move into disturbed sites prior to and during construction activities. Western burrowing owls frequently move into disturbed areas since they are adapted to highly modified habitats (Chipman et al., 2008; Coulombe, 1971).

Why impact would occur: Without focused surveys conducted following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, March 2012), adequate baseline conditions cannot be established, and associated impacts cannot be identified or analyzed. The MND does not propose avoidance, minimization, or mitigation measures if burrowing owls are found on the project site during construction, nor does the MND propose obtaining a CESA incidental take permit (ITP) if take of the species were to occur.

Evidence impact would be significant: As a candidate species for listing, western burrowing owl is granted the same protection as threatened or endangered species under CESA. Take of any CESA-listed species is prohibited except as authorized by State law (Fish and Game Code § 2080 and § 2085). Consequently, if a Project, including Project construction or any Project-related activity during the life of the Project, results in the take of CESA-listed species, CDFW recommends that the Project proponent seek appropriate authorization prior to Project implementation. This may include an ITP (Fish and Game Code § 2081).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure BIO-3:

To reduce impacts to less than significant: CDFW recommends focused burrowing owl surveys following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, March 2012). If active burrows are present within the Project footprint during pre-construction take avoidance surveys and complete avoidance is infeasible, the Project proponent shall not undertake Project activities and Project activities shall be postponed until the appropriate authorization (i.e. CESA ITP under the California Fish and Game Code § 2081) is obtained. CDFW recommends MM BIO-3 Western Burrowing Owl Avoidance and Mitigation, listed in Attachment A, to be incorporated into the MND.

COMMENT 4:

Appendix B, Section 4.3.1, Page 15

Issue: The Natural Environment Study in Appendix B states that no bats were observed under the bridge, but the general reconnaissance biological surveys were conducted during daylight hours and bat-focused surveys were not conducted.

Specific impact: Removal of existing roosting structures, construction disturbance including noise, light and vibration, and loss of foraging habitat may impede continued use of any potential existing roosting sites under the bridge. While bats may not be day roosting under the bridge, the underside of the bridge or surrounding vegetation may be used for night roosting.

Why impact would occur: The MND does not include focused bat surveys during appropriate time of day and thus does not include an adequate baseline evaluation from which to determine impacts or mitigation measures. California leaf-nosed bats (*Macrotus californicus*) emerge late in the day, usually one to two hours after sunset in the summer, and at sunset in winter; they have a second activity peak around 10 p.m. (Zeiner, 1990). Pallid bats (*Antrozous pallidus*) also emerge late in the day, starting approximately 30-60 minutes after sunset, with peak activities at approximately 90-190 minutes after sunset and shortly before dawn (Zeiner, 1990). Peak activity for Townsend's big-eared bats (*Corynorhinus townsendii*) is late evening (Zeiner, 2000).

Evidence impact would be significant: Bat species are protected by the California Fish and Game Code § 4150 (§ 4150 prohibits the take of naturally occurring nongame mammals, including bats). Bat maternity roosting habitats are protected as native wildlife nurse sites, and impediment of a site may be considered significant under CEQA.

California leaf-nosed bats are commonly found along the Colorado River and are sensitive to roost disturbance. California leaf-nosed bat may night roost in bridges, as they provide overhead protection (Zeiner, 1990).

Pallid bats are very sensitive to disturbance of roosting sites, which are essential for metabolic economy and juvenile growth. Night roosts serve as locations for prey consumption (Zeiner, 1990).

Roosting sites for Townsend's big-eared bats are the most important limiting resource for the species, and sites have high fidelity if left undisturbed. Townsend's big-eared bats are extremely sensitive to disturbance of roosting sites and a single visit may result in abandonment of the roost (Zeiner, 2000). Loss of night roosts may increase energy expenditure and may result in mortality if energy loss is not compensated for by increased prey intake. If lactating females have increased

energy expenditure, it may result in limited energy allocation towards dependent young and increase juvenile mortality (Chaverri and Kuntz, 2011).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure BIO-5:

To reduce impacts to less than significant: CDFW recommends MM BIO-5 Focused Bat Surveys and Preparation of a Bat Management Plan, listed in Attachment A, to be incorporated into the MND.

COMMENT 5:

Section IV Biological Resources, Page 26

Issue: The MND states that no work is expected to occur within the Yuma Main Canal and no impacts to the water will occur. However, the MND does not consider the potential for debris during bridge removal or other construction material to fall within the water of the canal. Additionally, the Project Summary on Page 14 states a 50-ton crane will remove portions of the original bridge's pylons, then states no alteration of streambed will occur.

Specific impact: The MND is unclear on how the removal and replacement of the bridge will be performed in a method that avoids impacts to the canal, and the typical section provided in the MND is not legible. Project construction activities include removal of pylons, which are within the flow of the canal.

Why impact would occur: The MND does not analyze impacts to the Yuma Main Canal if debris or other materials enter the water nor does the MND consider the possibility of such an event in the Biological Resource section, despite the majority of the Picacho Road Bridge spanning over water. As such, no avoidance, minimization, or mitigation measures were formulated or included in the MND to ensure that impacts are reduced to less than significant levels, nor is the notification requirement per Fish and Game Code section 1602 mentioned. It is also unclear if the existing pylons are embedded in the streambed of the canal.

Evidence impact would be significant: The Project may create impacts to the Yuma Main Canal that may adversely affect existing fish or wildlife resources. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other materials containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

To reduce impacts to less than significant: CDFW recommends that ICPDS require the Project proponent to submit a notification per Fish and Game Code section 1602 prior to commencing Project construction activities. CDFW recommends MM BIO-6 Lake and Streambed Alteration (LSA) Agreement, listed in Attachment A, to be incorporated into the MND.

II. Project Description and Related Impact Shortcoming

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

COMMENT 6:

Section IV Biological Resources, Page 26

Issue: The MND does not identify what best management practices (BMPs) are proposed and does not show which areas will be designated as Environmentally Sensitive Areas (ESA).

Specific impact: Neither the MND nor the Natural Environment Study in Appendix B describe what specific BMPs will be imposed to avoid impacts to the water in the Yuma Main Canal. Areas that will be designated as ESAs are not shown in either the MND or Appendix B. In addition, the MND does not explain how areas surrounding the Project are or will be designated as an ESA.

Why impact would occur: Without identifying the BMPs or establishing a set standard, the BMPs effectiveness at avoiding water impacts cannot be determined, measured, or enforced. The proposed ESAs are not provided in the MND for public review, so CDFW cannot determine if those proposed areas will adequately serve and protect sensitive habitat.

Evidence impact would be significant: The Project may create impacts to the Yuma Main Canal that may adversely affect existing fish or wildlife resources. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other materials containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

To reduce impacts to less than significant: CDFW recommends listing specific and enforceable BMPs, describing how the proposed BMPs will prevent Project construction activities from contacting the water in the Yuma Main Canal. CDFW also recommends that ICPDS notify CDFW per Fish and Game Code section 1602, in the event that in-water work does occur (See comment 5). Additionally, CDFW recommends providing a map with ESA-designated areas clearly delineated.

III. Mitigation Measure or Alternative and Related Impact Shortcoming

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

COMMENT 7:

Section Appendix B (Natural Environment Study), Page 15; Section IV Biological Resources, Page 26

Issue: The proposed MM BIO-2 in the MND does not address invasive plants, despite the Natural Environment Study in Appendix B including a measure addressing invasive plants under the Avoidance and Minimization Efforts/Compensatory Mitigation section.

Specific impact: Since none of the mitigation measures in the MND include methods to prevent the spread of invasive plant species, proper disposal of invasive plant material removed during Project clearing and grubbing activities may not occur, as there is no set standard. Furthermore, the Natural Environment Study in Appendix B states that invasive plants will “be removed in a manner that will not spread seeds or root material,” but does not state the method of removal or how on-site construction personnel will identify which plants are invasive.

Why impact would occur: The Natural Environment Study states that mostly invasive plant species were observed during the general reconnaissance biological surveys and that those species “would be expected to grow back rapidly if disturbed.” The MND states Project activities include clearing existing vegetation, which would disturb the surrounding invasive plants and increase their spread.

Evidence impact would be significant: Invasive species threaten the diversity or abundance of native species through competition for resources, predation, parasitism, interbreeding with native populations, transmitting diseases, or causing physical or chemical changes to the invaded habitat. Through their impacts on natural ecosystems, agricultural and other developed lands, water delivery and flood

protection systems, invasive species may also negatively affect human health and/or the economy. Examples of direct impacts to human activities include clogging navigable waterways and water delivery systems, weakening flood control structures, damaging crops, introducing diseases to animals that are raised or harvested commercially, and diminishing sportfish populations (CDFW, 2025).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Mitigation Measure BIO-2:

To reduce impacts to less than significant: CDFW recommends creating a worker environmental awareness program (WEAP) that is specific to the Project. CDFW also suggests creating separate mitigation measures for pre-construction nesting bird surveys (see Comment 8) and WEAP to ensure compliance and enforceability of on-site personnel during Project activities. CDFW provides revisions to MM BIO-2 in Attachment A.

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

COMMENT 8:

Section IV Biological Resources, Page 26

Issue: MM BIO-2 defers avoidance and minimization measures, stating “identification of nesting birds and procedures to follow if nesting is suspected.”

Specific impact: MM BIO-2 defers mitigation by only requiring a nesting bird procedure if a nest is found during future surveys. MM BIO-2 also does not consider impacts to birds on the Project site during non-nesting or non-breeding season, nor does it consider the disturbance created by construction activities.

Why impact would occur: All mitigation and avoidance and minimization measures incorporated to bring impacts to species to less than significant should be contained within the MND. Mitigation strategies developed at a later date may not be effective to reduce impacts to less than significant levels, as the requirements are not contained within the MND to ensure compliance.

Evidence impact would be significant: Under the CEQA Guidelines § 15126.4, mitigation measures should be implemented to address significant impacts that have been identified through environmental analysis. Formulation of mitigation measures should not be deferred to a future time, unless the Lead Agency has provided a

legitimate reason not to include the mitigation measures at the time of the Project's environmental review, which the Lead Agency has not provided in the MND.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Mitigation Measure BIO-1:

To reduce impacts to less than significant: CDFW suggests splitting MM BIO-2 to ensure compliance and enforceability, as stated in Comment 7. Since MM BIO-1, as it is currently written in the MND, proposes nesting bird surveys prior to construction, CDFW provides revisions to MM BIO-1 in Attachment A.

IV. Editorial Comments and/or Suggestions

Pages 11 and 14 of the MND state that the Project location is south of Interstate 8 and southeast of Mexico. However, the Picacho Road Bridge is north of Interstate 8 and north of Mexico. CDFW recommends correcting the location description.

Page 24 of the MND states that Project construction will start at the beginning of 2024, which has already passed. CDFW recommends correcting the construction date.

The MND is unclear on what type of swallows were observed in the Project vicinity. Page 12 of the MND states that bank swallows (*Riparia riparia*) were observed in the buffer zone, but Table 2 lists barn swallows (*Hirundo rustica*) as found in the vicinity instead. The remainder of the MND and Natural Environment Study in Appendix B only mention bank swallows and not barn swallows. Bank swallows are a CESA-listed threatened species (CDFW, April 2025). CDFW recommends clarifying the type of swallows observed during the general reconnaissance biological surveys.

The Sensitive Botanical and Zoological Species (CNDDDB/CNPS) chart in the Natural Environment Study analyzes the potential for presence of Colorado Desert fringe-toed lizard (*Uma notata*). The site potential states "not expected" as "riparian habitat is not present". Riparian habitat is typically not associated with this species, and CDFW recommends re-evaluation of the presence of this species based on habitat types within the Project site and the species habitat requirement of fine wind-blow sand (Thomson et al., 2016).

The Sensitive Botanical and Zoological Species (CNDDDB/CNPS) chart in the Natural Environment Study states that no habitat is expected for Gila woodpecker (*Melanerpes uropygialis*), but page 25 of the MND and pages 13 and 15 of the Natural Environment Study states that palm trees are available in the Project vicinity that could allow roosting or nesting. CDFW recommends correcting the MND and Natural Environment Study for consistency on Gila woodpecker.

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). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

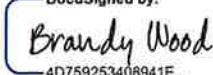
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing 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 MND to assist ICPDS in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Lily Mu, Senior Environmental Scientist (Specialist), at (909) 544-2521 or Lily.Mu@wildlife.ca.gov.

Sincerely,

DocuSigned by:

4D759253408941E...

Brandy Wood
Environmental Program Manager

Attachments

Attachment A. Draft Mitigation, Monitoring, and Reporting Program

ec: Office of Planning and Research, State Clearinghouse, Sacramento

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April 9, 2025
Page 15 of 23

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Attachment A
Draft Mitigation, Monitoring, and Reporting Program

Draft Mitigation, Monitoring, and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
BIO-1 Pre-Construction Bird Surveys: If construction or other Project activities are scheduled to occur Nesting surveys by qualified biologists during bird breeding nesting season (typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species); a pre-construction nesting bird survey shall be conducted by a qualified avian biologist prior to Project-related disturbance within and adjacent to the Project area. To avoid direct impacts to avian species, removal of habitat that could support nests and other Project-related disturbance in the Project site shall occur preferably time construction during non-breeding nesting season (September through January). In addition, any clearing of vegetation that may occur is required to take place outside of the nesting season. The survey shall be completed no more than 3 days prior to initial ground disturbance. Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nesting locations and nesting behavior (including but not limited to copulation, carrying food or nesting materials, nest building, agitation, aggressive interaction, feigning injury, or distraction displays), and non-nesting behavior (including but not limited to foraging or habitat defense). The nesting bird survey shall include the Project site and all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures. The applicant will submit the results of the pre-construction survey to CDFW for	Prior to the start of Project related activities	Project Proponent

review and approval prior to initiating any construction activities. If nesting birds or active nests are detected, the biologist shall establish an appropriately sized no-work buffer zone around the nest, which will be based upon the biologist's best professional judgment, the bird's displayed behavior (agitation or stress), the nesting species, its sensitivity to disturbance, nesting stage and expected types, and the intensity and duration of disturbance. The no-work buffer zone shall be clearly marked but should not alert predators. Construction activities shall not occur within any no-work buffer zone until the young birds have successfully fledged and the nest is deemed inactive by the qualified avian biologist.		
BIO-2 Worker Environmental Awareness Program (WEAP): Worker environmental awareness training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW): • Biology and status; • Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas; A qualified biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site, including but not limited to western burrowing owl (<i>Athene cunicularia hypugaea</i>), Gila woodpecker (<i>Melanerpes uropygialis</i>), California leaf-nosed bat (<i>Macrotus californicus</i>), Pallid bat (<i>Antrozous pallidus</i>), and Townsend's big-eared bat (<i>Corynorhinus townsendii</i>). The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area; (2) training to identify invasive plant species and methods to	Prior to the start of Project related activities	Project Proponent

avoid the spread of invasive plants on and around the Project site; (3) information on special-status species that have the potential to occur on the Project site; (4) Reporting procedures to be used if a any special-status species is encountered on-site. in the field; Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work on-site. and driving procedures and techniques, for commuting, and driving on, to the Project Site; and • Identification of nesting birds and procedures to follow if nesting is suspected.		
BIO-3 Western Burrowing Owl Surveys and Avoidance: Focused Burrowing Owl Surveys To avoid construction-level impacts to unidentified burrowing owls on-site, qualified biologists shall conduct focused burrowing owl surveys during the breeding and non-breeding season in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). The survey shall cover the Project site and a 150-meter (500-foot) buffer, where legally accessible. The Project applicant shall coordinate with CDFW in the preparation of a Burrowing Owl Protection and Mitigation Plan (see below) to allow commencement of disturbance activities on site. A pre-construction survey shall be conducted within 14 days prior to the start of construction activities (see below). Pre-Construction Survey and Avoidance Measures Depending on the Project activity type and associated disturbance, a minimum avoidance buffer distance of 50 meters (165 feet) to 100 meters (330 feet) during the non-breeding season (September through January) and 100 meters (330 feet) to 250 meters (825 feet) during the breeding season (February through August) shall be maintained between active burrows and construction activities. A qualified biologist shall monitor the burrowing owls for any sign of distress and adjust the buffers as necessary to ensure no take occurs.	Prior to the start of Project related activities	Project Proponent

Pre-construction take avoidance surveys for this species shall be conducted within 14 days prior to the start of ground disturbance and 24 hours prior to construction to determine the presence or absence of this species within the Project footprint. A report shall be submitted by a qualified and agency-approved biologist to CDFW. The Project footprint shall be clearly demarcated in the field by the Project engineers and biologist prior to the commencement of the pre-construction take avoidance surveys. The surveys shall follow the guidance of the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). If active burrows are present within the Project footprint and complete avoidance is infeasible, the Project proponent shall not undertake Project activities and Project activities shall be postponed until the appropriate authorization (i.e. CESA incidental take permit under the California Fish and Game Code § 2081) is obtained. Should permanent loss of western burrowing owl habitat occur the ratio of acquisition to loss must be at a minimum of 1:1. The ratio shall be higher for occupied and irreplaceable habitats. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Permanent protection of mitigation land shall be established through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.		
BIO-4 Pre-Construction Plant Surveys:	Prior to the start of Project related activities	Project Proponent

Prior to the start of construction, a qualified biologist² shall conduct a botanical field survey following the methodology described in <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW, March 2018). The survey shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of areas proposed for disturbance and indirectly impacted by the Project. The results of the survey shall be documented in a letter report that will be submitted to ICPDS and CDFW. The survey shall be conducted annually until start of construction to ensure the floristic diversity is accurately captured and effective avoidance, minimization, and mitigation strategies are developed. If special-status plant species are observed during the pre-construction rare plant survey(s) within the development area of the Project, the Project shall be designed to reduce impacts to these species through the establishment of buffers, to the extent feasible. Buffer distances will be determined by the qualified biologist, typically 50 feet or greater from an identified special-status plant species, unless the qualified biologist determines a reduced buffer would suffice to avoid impacts to the species. If avoidance of special-status plant species is not feasible, a Special-Status Plant Relocation Plan shall be developed and implemented. The Special-Status Plant Relocation Plan shall address mitigation for special-status plants, including but not limited to: topsoil salvage to preserve seed bank		
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² Botanical field surveyors should possess the following qualifications: Knowledge of plant taxonomy and natural community ecology; Familiarity with plants of the region, including special status plants; Familiarity with natural communities of the region, including sensitive natural communities; Experience with the CNDDDB, BIOS, and Survey of California Vegetation Classification and Mapping Standards; Experience conducting floristic botanical field surveys as described in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, March 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor; Familiarity with federal, state, and local statutes and regulations related to plants and plant collecting; and Experience analyzing the impacts of projects on native plant species and sensitive natural communities.

and management of salvaged topsoil; seed collection, storage, possible nursery propagation, and planting; salvage and planting of bulbs as feasible; location of on-site receptor sites; land protection instruments for receptor areas; and funding mechanisms. The Special-Status Plant Relocation Plan shall include methods, monitoring, reporting, success criteria, adaptive management, and contingencies for achieving success. The plan shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map and included on the construction, grading, fuel modification, and landscape plans.		
BIO-5 Focused Bat Surveys and Preparation of a Bat Management Plan: All suitable roosting and foraging habitat for local or migratory bat species known to the Project area, including special-status species, found within the Project site and adjacent land shall be surveyed throughout one year, prior to initial site clearing activities. The surveys shall be completed by a qualified bat biologist whose resume shall be reviewed and approved by CDFW. Surveys shall include determination of the approximate size of the colony(s) and species present. The surveys shall include a combination of nighttime emergence counts and acoustic techniques (full spectrum bat acoustic detectors) appropriate for the roosting habitat and time of year, visual and aural surveys (observation during foraging period), and inspection for suitable habitat and bat sign (e.g. guano). Surveys shall be conducted during the spring, summer, fall, and winter to determine how the habitat is being used by bats throughout the year, including foraging patterns and habitat, and the presence overwintering bats, with at least two surveys conducted during the maternity season to determine a pre- and post-volant count of colonies present. If roosting bats, of any status, are found during the surveys, the bats and roosts shall be avoided to the maximum extent practicable with consideration of the most disturbing Project activities and their effect (e.g. demolition and night-time lighting). A Bat Management Plan prepared	Prior to the start of Project related activities	Project Proponent

by the qualified bat biologist identifying situation-specific and species-specific avoidance and minimization measures to reduce impacts to roosting and foraging bats shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. The Bat Management Plan shall include, as appropriate to the findings of the surveys and roosting habitat affected, a construction schedule to avoid roosting season, spatial and temporal avoidance measures, non-disturbance buffers, passive exclusion of bats outside of the maternity season (if necessary), and identification of species-specific replacement or alternative habitat to mitigate for permanent maternity or night roosting habitat loss. If roosts cannot be avoided or it is determined that construction activities will cause roost abandonment, a mitigation plan addressing exclusion and passive relocation procedures and impact compensation will be developed. The mitigation plan will be developed in consultation with CDFW and the qualified bat biologist. Roost and foraging habitat shall be replaced in-kind prior to any exclusion or in a timing approved by CDFW. Any exclusion and passive relocation efforts shall avoid periods of sensitive activity (e.g. hibernation or maternity season) and may require several seasons for bats to discover alternative roosting sites.		
BIO-6: Lake and Streambed Alteration (LSA) Agreement The Project shall be designed to avoid all impacts to the Yuma Main Canal, including preventing falling debris during the bridge removal and installation process. If impacts to the Yuma Main Canal cannot be avoided in its entirety, the Project proponent shall notify per Fish and Game Code section 1602 to seek appropriate authorization prior to the start of Project-related activities. If CDFW determines that an LSA Agreement is required and shall be issued, the Project proponent shall comply with the terms of the LSA Agreement, including the mitigation requirements detailed in the LSA Agreement. Mitigation to areas subject to Fish and Game Code section 1602 shall be compensated at one acre of mitigation for every one acre of impact through restoration to pre-project activities, or off-site mitigation that is protected and managed in perpetuity. Permanent protection of mitigation land shall be established through a conservation easement deeded to a nonprofit conservation organization or public agency with a	Prior to the start of Project related activities	Project Proponent

conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment. Credits at a CDFW-approved mitigation or conservation bank may also be purchases to compensate for permanent impacts.		
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April 9, 2025

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

RECEIVED

By Imperial County Planning & Development Services at 9:27 am, Apr 10, 2025

SUBJECT: Notice of Intent for a Mitigated Negative Declaration for Initial Study 24-0037 for Picacho Road Bridge Replacement Project – Imperial County Department of Public Works

Dear Mr. Minnick:

The Imperial County Air Pollution Control District (Air District) would like to thank you for the opportunity to review and comment on the Notice of Intent (NOI) for a Mitigated Negative Declaration (MND) for Initial Study (IS) 24-0037(Project). The project proposes replacing the existing Picacho bridge which leads into the Townsite of Winterhaven due to cracking and outliving its useful life. The project is located along Picacho Rd. in Winterhaven and spanning over the Yuma Main Canal and is also identified with Assessor's Parcel Number 056-600-011.

The Air District provided comments for the project previously in a letter dated October 24, 2024 and will reiterate some of its relative comments: the project must comply with all Air District Rules & Regulations including Regulation VIII – Fugitive Dust Rules, a collection of rules designed to maintain fugitive dust emissions below 20 % visual opacity, as was previously recognized by the applicant. If the project will operate combustion equipment, such as a generator, it should be registered with California Air Resources Board (CARB) Portable Equipment Registration Program (PERP) or it may be subject to Air District permitting requirement under Air District Rules 201, 202, 207, & 208. The applicant should submit an application for engineering review of the equipment if it is not PERP registered to determine its permitting requirements.

For your convenience, all Air District rules and regulations can be accessed online at <https://apcd.imperialcounty.org/rules-and-regulations> and engineering application can be found at <https://apcd.imperialcounty.org/engineering/>. Should you have any questions or concerns please feel free to contact the Air District by calling our office at (442) 265-1800.

Respectfully,



Ismael Garcia
Environmental Coordinator



Reviewed by,
Monica Soucier
APC Division Manager

ATTACHMENT “F”

REVISED INITIAL STUDY AND MMRP

- ☐ **NEGATIVE DECLARATION**
☒ **MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis
For:*

**IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL
INITIAL STUDY (IS) # 24-0037**



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

January 2025

TABLE OF CONTENTS

	<u>PAGE</u>
 <u>SECTION 1</u>	
I. INTRODUCTION	6
 <u>SECTION 2</u>	
II. ENVIRONMENTAL CHECKLIST	11
PROJECT SUMMARY	15
ENVIRONMENTAL ANALYSIS	19
I. AESTHETICS	19
II. AGRICULTURE AND FOREST RESOURCES	20
III. AIR QUALITY.....	21
IV. BIOLOGICAL RESOURCES.....	24
V. CULTURAL RESOURCES	28
VI. ENERGY	29
VII. GEOLOGY AND SOILS	29
VIII. GREENHOUSE GAS EMISSION	31
IX. HAZARDS AND HAZARDOUS MATERIALS.....	33
X. HYDROLOGY AND WATER QUALITY.....	35
XI. LAND USE AND PLANNING	36
XII. MINERAL RESOURCES.....	37
XIII. NOISE.....	38
XIV. POPULATION AND HOUSING.....	40
XV. PUBLIC SERVICES.....	41
XVI. RECREATION.....	42
XVII. TRANSPORTATION.....	43
XVIII. TRIBAL CULTURAL RESOURCES.....	44
XIX. UTILITIES AND SERVICE SYSTEMS	45
XX. WILDFIRE	46
 <u>SECTION 3</u>	
III. MANDATORY FINDINGS OF SIGNIFICANCE	48
IV. PERSONS AND ORGANIZATIONS CONSULTED	49
V. REFERENCES	50
VI. MITIGATED NEGATIVE DECLARATION - COUNTY OF IMPERIAL	60
VII. FINDINGS	61
 <u>SECTION 4</u>	
VIII. RESPONSE TO COMMENTS (IF ANY)	62
IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)	63

TABLES

Table 1: Significance Thresholds for Criteria Pollutants	22
Table 2: Air Quality Standards and Designations for Project Area within the Salton Sea Air Basin	23
Table 3: Project Maximum Daily Construction Emissions (pounds/day).....	24
Table 4: Construction GHG Emissions.....	30
Table 5: Consistency with CARB's 2017 Scoping Plan Measures for Individual Projects.....	31
Table 6: Existing Noise Sources in Project Site.....	36
Table 7: Construction Equipment Noise Levels.....	37
Table 8: Imperial County Population Inventory.....	38
Table 9: Unincorporated Imperial County Demographic Composition.....	39

Exhibits

Exhibit A: Project Vicinity.....	15
Exhibit B: Project Location and Footprint.....	16
Exhibit C: Bridge Design.....	17
Exhibit D: Project Site and Nearest Sensitive Receptors.....	37

APPENDICES

Appendix A - Construction Details & CalEEMod Report	
Appendix B - Biological Resources Survey	
Appendix C - Cultural Report	

Acronyms and Abbreviations

AB	Assembly Bill
AFY	Acre-Feet Per Year
AQMP	Air Quality Management Plan
ARMR	Archaeological Resource Management Reports
ATSM	American Society for Testing and Materials
BLM	Bureau of Land Management
BMP	Best Management Practices
BOR	Bureau of Reclamation
CAAQS	California Ambient Air Quality Standards
CALFIRE	California Department of Forestry and Fire Protection
Cal-EPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, And Liability Act
CFR	Code of Federal Regulations
CH ₄	Methane
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COSFM	California Office of the State Fire Marshall
CRHR	California Register of Historical Resources
CWA	Clean Water Act
CY	Cubic Yards
dB	Decibels
dBA	A-weighted Decibels
DOC	California Department of Conservation
DWR	Department of Water Resources
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
GHG	Greenhouse Gas
GWP	Global Warming Potential
HCP / NCCP	Habitat Conservation Plan / Natural Community Conservation Plan
HP	Horsepower
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
in/sec	Inches per second
IPCC	Intergovernmental Panel on Climate Change
Lbs	Pounds
Leq	Energy Equivalent or Energy Average Level

LID	Low Impact Development
Lmax	Maximum A-weighted Sound Level
LRA	Local Responsibility Area
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resources Zones
N2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAV	Navigation
NO2	Nitrogen Dioxide
Nox	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O3	Ozone
O&M Plan	Operations and Maintenance Plan
PEIR	Programmatic Environmental Impact Report
PM	Particulate Matter
PM _{2.5}	2.5 Fine Particulate Matter
PM ₁₀	Respirable Particulate Matter
PMM	Program Mitigation Measure
PPV	Peak Particle Velocity
RARE	Rare, Threatened, or Endangered Species
ROW	Right-of-Way
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VdB	Vibration Level in Decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
CDFW WL	CDFW Watchlist
YCWUA	Yuma County Water Users' Association

SECTION 1 INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Picacho Road Bridge Replacement Project at Yuma Main Canal. (Refer to Exhibits A, B, and C).

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

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

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

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

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

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

This Initial Study has determined that the proposed Project will result in any potentially significant environmental impacts and, therefore, a Mitigated Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

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

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

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

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

D. CONTENTS OF INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than 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.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this Initial Study and Mitigated Negative Declaration.

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

VI. MITIGATED NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

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

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

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

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

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

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

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

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

Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. *Environmental Checklist*

1. **Project Title:** Imperial County Project No. 6811, Picacho Road Bridge Replacement Project at Yuma Main Canal, Initial Study (IS) # 24-0037.
2. **Lead Agency:** Imperial County Planning & Development Services Department (ICPDS)
3. **Contact person and phone number:** Luis Bejarano, Planner I, (442) 265-1736
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** luisbejarano@co.imperial.ca.us
6. **Project location:** The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County. The Project Site is approximately 0.3 miles ~~south-north~~ of Interstate 8 (I-8), 0.6-75 miles ~~east-north~~ of First Street, and approximately 6 miles ~~southeast-northeast~~ of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).
7. **Project sponsor's name and address:** Imperial County Public Works Department, 155 S. 11th Street, El Centro, CA 92243.
8. **General Plan designation:** Surrounding the proposed Project is the Fort Yuma Indian Reservation which is designated as Agriculture in the County's General Plan. The project area supports the Yuma Main Canal, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The Bureau of Reclamation (BOR) owns the Yuma Main Canal. Imperial County has an easement and provides transportation for the population over the canal.
9. **Zoning:** The Fort Yuma Indian Reservation lands are zoned Native American.
10. **Description of project:** The proposed Project is located at Picacho Bridge over Yuma Main Canal (Picacho Road, Winterhaven, CA 32.7358 N, 114.6241 W and within APN 056-600-011) and is intended to replace the existing bridge leading into the Townsite of Winterhaven in Supervisorial District 1. The proposed Project presents a unique opportunity to construct a modern bridge that implements Best Management Practices (BMPs) concurrently with transportation amenities. Due to cracking and outliving its useful life, the existing wood bridge must be replaced to support commerce, access to the Quechan Reservation and the Bard community, and provide a safer crossing of the Yuma Main Canal. The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association.

Due to its deteriorating condition, it is proposed to replace the existing bridge with a new Precast Prestressed Concrete Girder Bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to avoid the inadvertent release of debris or fill into the canal. The roadway profile is proposed to be raised to approximately 5 feet-4 inches higher than the existing condition, achieving a minimum of 2 feet of vertical clearance over the existing canal bank elevation per the BOR's *Engineering and O&M Guidelines for Crossings*.

The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders,

and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge.

11. Surrounding land uses and setting: The project is located along Picacho Rd. (S-24) 0.4- miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East. The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. At 130 ft (40 m) above sea level, the project is located 0.4 miles north of the Colorado River. The Cargo Muchacho Mountains are 8.5 miles to the northwest, the Algodones Dunes are 13 miles to the west, and the Laguna and Gila Mountains are 11 miles to the east. The project is in the southeastern portion of the Colorado Desert Province and within the Lower Colorado/Gila River Valleys Ecoregion. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation.

12. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Planning Commission

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

The lead CEQA agency must begin the Assembly Bill (AB) 52 consultation process prior to the release of a ND, MND, or EIR. The AB 52 consultation process shall begin with the Lead Agency (ICPDS) providing written notification to California Native American Tribes who identify as being traditionally and culturally affiliated with the Proposed Project area. The written notification includes a brief description of the Proposed Project, including the location, the Lead Agency's contact information, and notification that the California Native American Tribe has 30 days to request consultation, per AB 52. Upon receipt of a written response from a California Native American Tribe requesting consultation, the Lead Agency and the California Native American Tribe(s) requesting consultation shall begin AB 52 consultation.

The proposed project occurs within the Fort Yuma Indian Reservation thus tribal consultation was undertaken with the Fort Yuma Quechan Tribe. A meeting was facilitated between the Bureau of Reclamation, Fort Yuma Quechan Historic Preservation Office (Quechan HPO), and NV5 to discuss requirements for conducting cultural resource projects on Tribal land in Spring 2021. Quechan HPO was granted for the completion of the California Historic Resources Information System search in Summer 2021. Quechan THPO staff did not indicate any concern about Traditional Cultural Places within the proposed project area. In October 2022, prior to conducting fieldwork, a Plan of Work for the cultural resource survey was provided to the Quechan THPO to present to the Tribal Council for approval. After receipt of approval, fieldwork was completed on October 12, 2022. (See Appendix C). The AB 52 consultation process was conducted by Imperial County Planning and Development Services between October 16, 2024, to November 15, 2024 and although no formal letter response was received by Tribes, the Quechan Indian Tribe did express interest via telephone conversation. If response comments are received from the Quechan Indian Tribe, or other Native American interests, such comments will be acknowledged by the County and will be incorporated within this Initial Study as appropriate.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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

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

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

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

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

Jim Minnick, Director of Planning/EEC Chairman

Date:

PROJECT SUMMARY

A. Project Location: The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County, (Exhibit A, Project Vicinity and Exhibit B, Project Location and Footprint). The Project Site is approximately 0.3 miles south-north of Interstate 8 (I-8), 0.6-75 miles east-north of First Street, and approximately 6 miles southeast-northeast of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).

B. Project Summary: The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association. The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders, and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge.

The newly designed bridge will have a minimum freeboard of 2.31' above the high-water surface elevation of 140.74, received from YCWUA. This elevation is at the edge of the existing canal bank. As seen in the drawings provided, the freeboard is 2'-4" (2.33') from edge of the channel to the low girder elevation. A 50-ton crane will be utilized to remove portions of the bridge with all materials to be transported to an approved landfill. The original bridge pylons will be removed by crane; best management practices will be employed to minimize removal impacts and will not alter the streambed or employ dredging activities. As depicted in Exhibit C below, all construction activities will be contained within the area highlighted by the red boundary. The total construction work area is approximately 2.8 acres. Tree removal and removal of other vegetation along the canal will be necessary for the proposed Project. Existing vegetation will need to be cleared and grubbed prior to grading operations. Temporary construction easements will be needed to facilitate utility relocations and allow construction access. Construction is anticipated to last for a period of one year. All construction activities such as site preparation, grading, utility relocation, and site restoration would be contained within the construction work area.

C. Environmental Setting:

The project is located along Picacho Rd. (S-24) 0.4- miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East (see Exhibit A and Exhibit B). The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. At 130 ft (40 m) above sea level, the project is located 0.4 miles north of the Colorado River. The Cargo Muchacho Mountains are 8.5 miles to the northwest, the Algodones Dunes are 13 miles to the west, and the Laguna and Gila Mountains are 11 miles to the east. The project is in the southeastern portion of the Colorado Desert Province and within the Lower Colorado/Gila River Valleys Ecoregion. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation..

D. Analysis:

The County is the CEQA lead agency having authority to authorize the construction of the project. The County would obtain all necessary permits or licenses from the appropriate federal, state, and/or other local agencies having a permit authority. Surrounding the proposed Project area are agricultural lands on the Fort Yuma Indian Reservation, the Yuma Main Canal, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The land the bridge is located on is designated as Agriculture by the County and Other Land by the California Department of Conservation (DOC). The Bureau of Reclamation (BOR) owns the Yuma Main Canal. Imperial

County has an easement and provides transportation for the population over the canal. The Proposed Project would construct a new improved bridge structure in place of the existing wood bridge where it crosses the Yuma Main Canal. The Proposed Project is consistent with both the Imperial County General Plan's land use designation of the Proposed Project site and the County's Land Use Ordinance. Therefore, the adoption of the CEQA Initial Study for the Proposed Project would be consistent with applicable County and State ordinances and regulations.

E. General Plan Consistency:

In addition to the analysis stated above, the project is found to be consistent, with the adoption of CEQA Initial Study for the proposed Picacho Bridge Replacement Project.

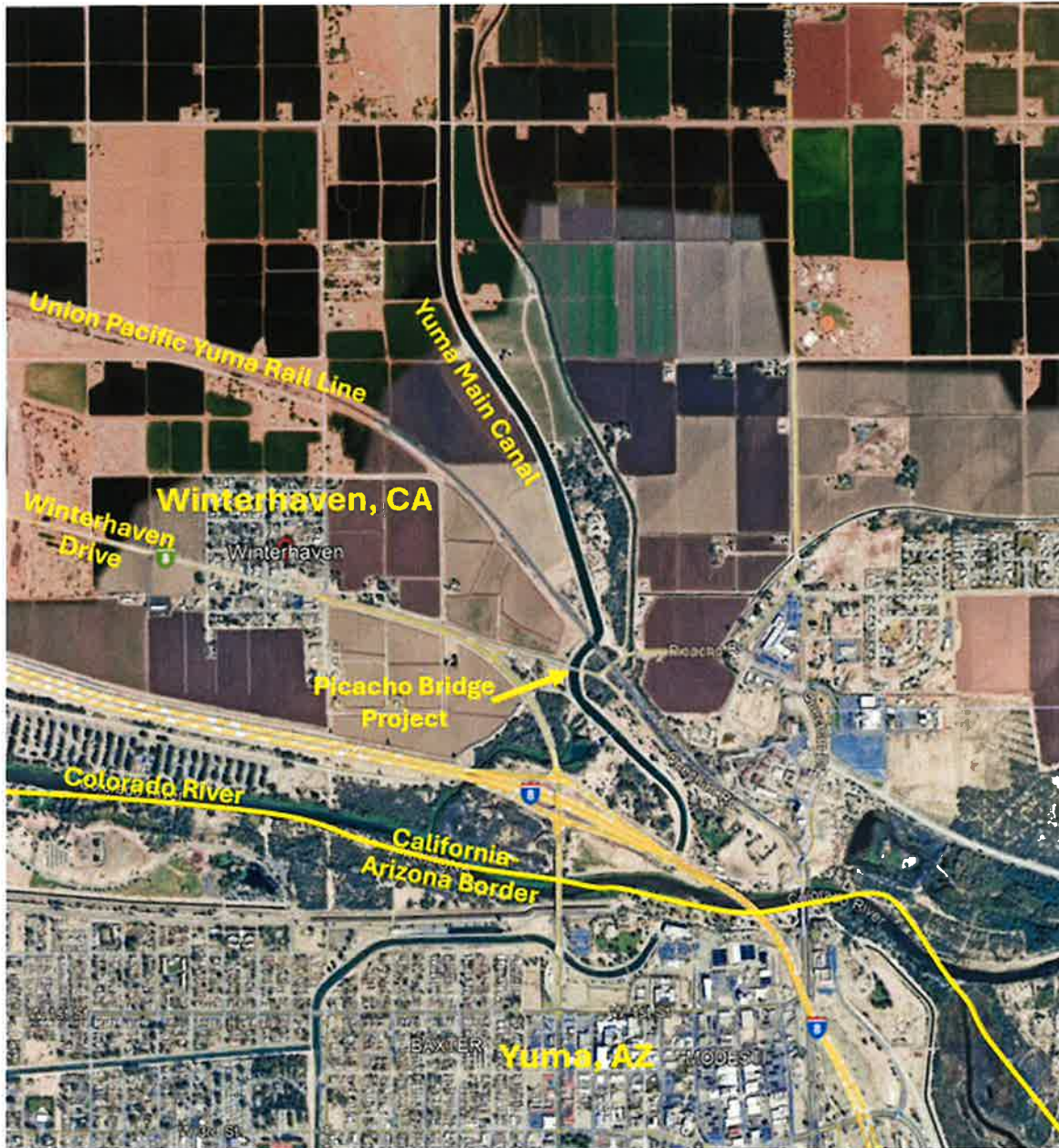


Exhibit A
Project Vicinity

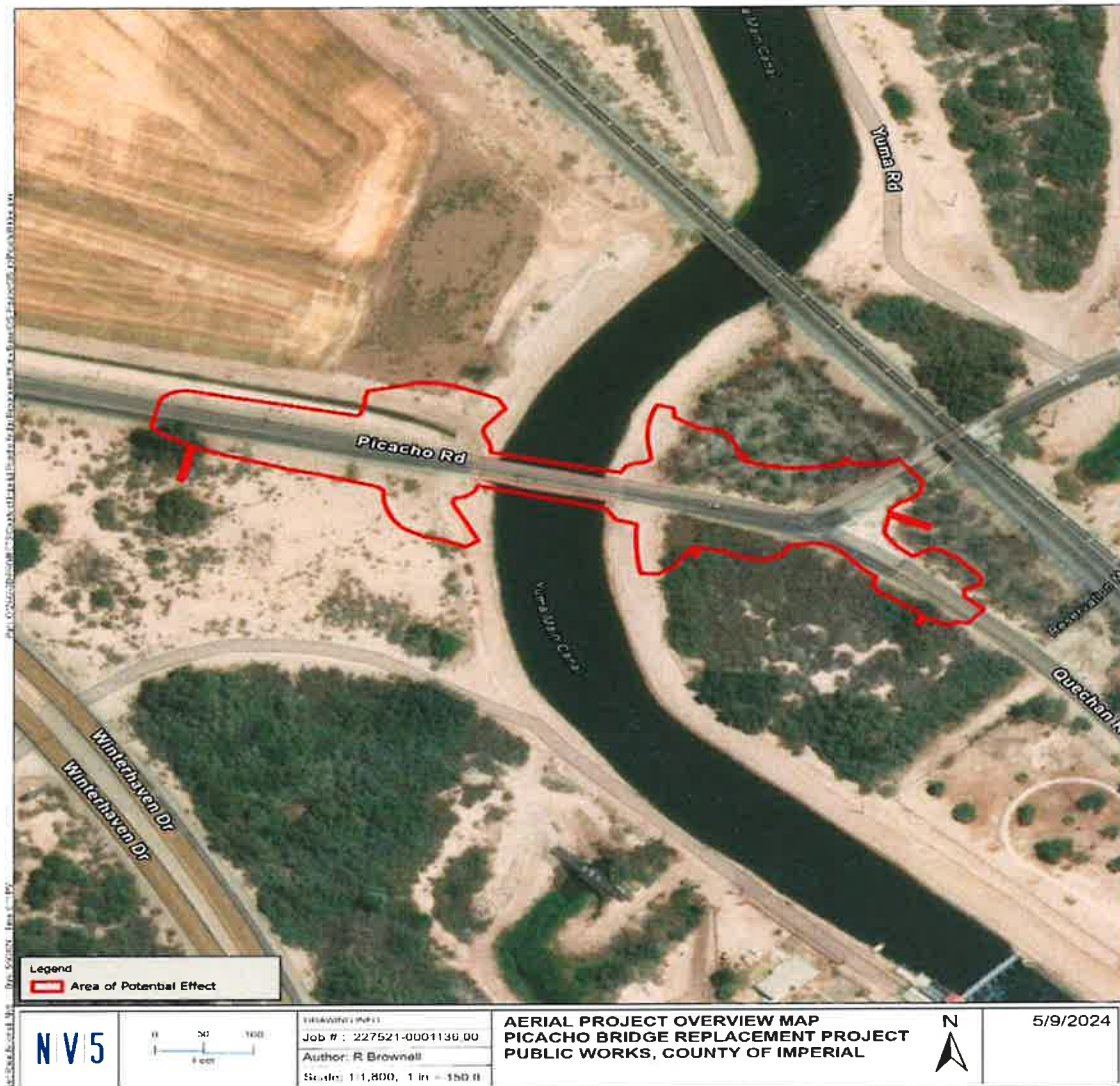


Exhibit B
 Project Location and Footprint



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)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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I. AESTHETICS

The Project Site is in southeastern Imperial County on Fort Yuma Indian Reservation, near the unincorporated Townsite of Winterhaven, which predominantly is an agricultural community. The proposed Project will be located on Picacho Road in County ROW, on the site of an existing deteriorated wood bridge. The proposed Project crosses the Yuma Main Canal and runs parallel to the open-water Seminole Canal. The Yuma Main Canal and Seminole Canal are administered through the Yuma County Water Users' Association (YCWUA) in conjunction with the Bureau of Reclamation (Bureau of Reclamation 2022). The channels are manmade and supply water to irrigate farmland in the County. Views from the bridge are typical of farmland in all directions, including the open channels of water running west and north, the railroad, and Picacho Road to the west. The viewshed is compatible with the zoning of the land surrounding the proposed Project.

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

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

a) Scenic vistas are typically categorized as either panoramic views (visual access to a large geographic area) or focal views (visual access to a particular object, scene, setting, or feature of interest). The proposed Project will replace the existing bridge on Picacho Road. The proposed Project is located in southeastern Imperial County, Fort Yuma Indian Reservation, near the unincorporated Townsite of Winterhaven. The proposed Project Site is mainly utilized for agriculture and is characterized by land designated as Agriculture. The bridge is a transportation route across the Yuma Main Canal that supplies water to irrigate the surrounding farmland.

The proposed Project consists of replacing the existing bridge on Picacho Road. There is a potential during temporary construction for the proposed Project construction to impact the scenic vistas for signage, staging, etc. However, upon completion of temporary construction, in compliance with the General Plan, no permanent impact on scenic vistas from the proposed Project would occur. The new bridge will look similar to the existing bridge in scale and height. A less than significant impact would occur.

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

b) According to Caltrans' California State Scenic Highway System Map, no designated or eligible State Scenic highways are near the proposed Project Site (Caltrans 2018). The closest eligible highway is 80 miles west, on Interstate 8, of the proposed Project, and the closest designated highway is 120 miles northwest, on SR-78, of the proposed Project. Imperial County administers highways through the Caltrans California State Scenic Highway System (Imperial County 2008). The proposed Project would not damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings along a State scenic highway. No impact would occur.

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

c) Agricultural farmlands, water canals, and railroads dominate the existing visual character of the Project Site and surroundings. The Project Site consists of the asphalt bridge on Picacho Road that crosses the Yuma main canal. Staging and storage of construction vehicles will take place within the existing right-of-way of Picacho Road between the bridge and Winterhaven Drive to accommodate the contractor's temporary facilities. The proposed Project proposes a replacement of the bridge on Picacho Road.

The farmland surrounding the proposed Project is considered to be scenic. During construction, views across the Project Site and surrounding areas would be affected by staging, grading, vehicles, and signage. However, the construction impact is planned to take one year and upon completion of the proposed Project, would not have a permanent effect on surrounding lands and the site will return to a similar footprint to the existing infrastructure (updated infrastructure). The effect on nonurbanized areas would be less than significant.

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

d) The proposed Project proposes nighttime construction that would require lighting. This lighting would be shielded to

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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prevent spill-over to areas outside of the project's construction footprint. There is no existing permanent lighting that will need to be replaced on the bridge. No new source of permanent lighting or glare that would adversely affect day or nighttime views in the area for the proposed Project. There will be a temporary source of lighting during nighttime construction, and upon completion will return to a similar footprint. A less than significant impact would occur.

II. AGRICULTURE AND FOREST RESOURCES

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

Would the project:

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

a) The proposed Project would be located within existing roadways and will extend outside of the County's Right-of-Way; acquisition of ROW will be required. It consists of the replacement of an existing bridge with a new and improved bridge structure to be reconstructed in the same alignment as the existing bridge over the Yuma Main Canal. The Project Site is located in a rural area of Imperial County that contains thousands of acres of farmland. The Project Site does not contain agricultural operations, practices, or farmland; however, it is located adjacent to a group of agricultural lands. NV5 reviewed California Department of Conservation's (CDOC) Farmland Mapping and Monitoring Program (FMMP) inventory, reports, maps, and imagery (CDOC 2004 and 2022a).

The California Important Farmland Finder showed that FMMP designated Unique Farmland is located adjacent to the Project Site. Unique Farmland is defined as farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. The Unique Farmland is located immediately north of Picacho Road, west of Yuma Main Canal, and south of the Union Pacific Railroad. The portion of Unique Farmland that is within the Project Site is located north of Picacho Road and immediately west of the Yuma Main Canal access road. Also, during the construction phase, the proposed Project could result in minor temporary indirect impacts to the Unique Farmland located adjacent to the project footprint. This potential indirect impact area would be small and restricted in nature compared to the remaining Unique Farmland in the Project Site. Direct and indirect impacts on Unique Farmland would be considered less than significant because the impacts on the farmland would be temporary, small, isolated, and/or restricted in nature compared to the remaining Unique Farmland in the Project Site.

This farmland is not located within the project footprint and would not be directly impacted by the proposed Project; however, during the construction phase, the project could result in minor temporary indirect impacts to the Prime Farmland located adjacent to the project footprint. The potential indirect impact area would be small and restricted in nature compared to the remaining Prime Farmland in the project area. Impacts would not cause the conversion of those Prime Farmlands to non-agricultural use; therefore, they would be considered less than significant. However, the Imperial County General Plan, Objective 3.6, states that projects occurring adjacent to agricultural land must create an on-site buffer zone and shall favor protection of the maximum amount of farmland. Thus, Mitigation Measure AG-1 will be implemented to ensure that a less-than-significant impact would occur to the surrounding farmland.

MM AG-1: Create an on-site buffer zone surrounding the Project Site to ensure no indirect impacts would occur to surrounding agricultural lands. It is recommended the County will need to obtain a signed statement from adjacent property owners stating that no indirect impacts will occur to their property.

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

b) NV5 reviewed the Imperial County General Plan and the Imperial County Land Use Zoning map application (Imperial County 2022b). The Project Site is within the Fort Yuma Indian Reservation and adjacent to agricultural land, however the proposed

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Project would not conflict with existing zoning for agriculture use or a Williamson Act Contract. The Project Site and surrounding area is zoned as "Native American." The proposed project is located adjacent to Unique Farmland, however, with the implementation of Mitigation Measure AG-1, impacts would be less than significant.

Review of the CDOC's California Williamson Act Enrollment Finder (CDOC 2022b) showed that Imperial County is a "non-participating or withdrawn" entity. Imperial County exited the Williamson Act program by non-renewing all contracts within the County. The Project Site is not located within or adjacent to land that is enrolled in a Williamson Act Contract; therefore, no impacts to lands under a Williamson Act Contract would occur.

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

c) The proposed Project is in land zoned as Native American and is located within the County ROW (Picacho Road). The proposed Project is not in any forest land or area zoned for Timberland production. The proposed Project would maintain the existing zoning and would not conflict with existing zoning for or cause the rezoning of forest land, timberland, or timberland-zoned Timberland Production. No impact would occur.

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

d) As stated in (c), the proposed Project will maintain its existing land use as a bridge for transportation, and no loss of forest land or conversion of forest land to non-forest use will occur within the Project Site. No impact would occur to forest land.

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

e) Please refer to the responses to thresholds (a) through (d) above. The Project Site and adjacent lands do not contain forest lands, therefore, no impacts to forest land would occur. The proposed Project is anticipated to impact Prime Farmland and Unique Farmland; however, with the implementation of Mitigation Measure AG-1, impacts related to conversion of Farmland to non-agricultural use would be less than significant.

III. AIR QUALITY

The Project Site is located in Imperial County which is part of the Salton Sea Air Basin (SSAB). According to ICAPCD, Imperial County extends into the southeastern corner of California and is bordered on the south by Mexico, on the east by Arizona, and north by Riverside County. The climatic conditions in Imperial County are based on the large-scale sinking and warming of air in the semipermanent tropical high-pressure zone of the eastern Pacific Ocean. The coastal mountains prevent intrusion of any cool, damp air found in California coastal areas. Winters are reported to be mild and dry with average daily temperatures ranging from 65°F- 75°F (18-24°C) and sometimes even maximum temperatures of 80°F. Imperial County has hot summers with temperatures ranging between 104°F- 115°F (40-46°C) and sometimes as high as 120°F. Imperial County has a flat terrain and due to its temperature differences created by solar heating, there are moderate winds and deep thermal convection. Due to its distance from the ocean and mountain highlands, Imperial County has limited precipitation. Rainfall from a heavy storm can exceed the entire annual total during a later drought condition. Humidity is also very low throughout the year, with an average of 28% in the summer and 52% in the winter. Wind statistics show that wind patterns are from west-northwest through southwest and a secondary flow maximum from the southwest area. The winds from the west and northwest occur from the fall through spring and come from the Los Angeles area. Half of the observed wind speeds measure less than 6.8 miles per hour (mph). However, during April and May there may be periodic high winds that can exceed 31 miles per hour (mph).

Potentially
Significant
Impact
(PSI)

Less Than
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Mitigation
Incorporated
(LTSMI)

Less Than
Significant
Impact
(LTSI)

No Impact
(NI)

Table 1: Significance Thresholds for Criteria Pollutants

ICAPCD Significance Thresholds for Criteria Pollutants			
Pollutant	ICAPCD Construction Threshold (lbs/day)	ICAPCD Operational Threshold (lbs/day)	General Conformity de minimis Thresholds (tons/year)
PM ₁₀	150	<150	N/A
PM _{2.5}	-	-	N/A
ROG	75	<55	100
NO _x	100	<55	100
CO	550	<550	N/A

N/A= not applicable since air basin is in attainment or unclassified.

Table 2: Air Quality Standards and Designations for Project Area within the Salton Sea Air Basin

Ambient Air Quality Standards & Designations					
Pollutants	Average Time	State Standards	State Attainment Status	Federal Standards	Federal Attainment Status
Ozone	1-hr	0.09 ppm	N	None	-
	8-hr	0.070 ppm	N	0.070 ppm*	N**
Particulate Matter (PM ₁₀)	24-hr	50 ug/m ³	N	150 ug/m ³	U
	Annual	20 ug/m ³	N	None	-
Fine Particulate Matter (PM _{2.5})	24-hr	None	-	35 ug/m ³	U/A
	Annual	12 ug/m ³	A	12 ug/m ³	U/A
Carbon Monoxide (CO)	1-hr	20 ppm	A	35 ppm	U/A
	8-hr	9 ppm	A	9 ppm	U/A
Nitrogen Dioxide (NO ₂)	1-hr	0.18 ppm	A	100 ppm	U/A
	Annual	0.030 ppm	A	0.053 ppm (100 ug/m ³)	U/A
Sulfur Dioxide (SO ₂)	1-hr	0.25 ppm	A	0.075 ppm (196 ug/m ³)	A
	24-hr	0.04 ppm	A	0.14 ppm	A
	Annual	None	A	0.030 ppm	A
Lead	30-day average	1.5 ug/m ³	A	None	-
	Calendar Quarter	None	-	1.5 ug/m ³	U
	Rolling 3-month average	None	-	0.15 ug/m ³	U
Hydrogen Sulfide	1-hour	0.03ppm	U	None	-
Visibility reducing Particles	8-hour (10:00 to 18:00 PST)	***	U	None	-
Sulfates	24-hour	25 ug/m ³	A	None	-

*U.S. EPA revised the 8-hour ozone standard from 0.075 to 0.070 ppm on October 1, 2015.

**The attainment status is based on the 2008 8-hour ozone standard (0.075 ppm).

U= Unclassified

A=Attainment

N=Nonattainment

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon for the following determinations.

Would the Project:

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

a) The proposed Project is in the Salton Sea Air Basin (SSAB) and currently in non-attainment for the CAAQS for PM₁₀ and Ozone, and for the NAAQS 8-hour ozone. All development within the SSAB, including the proposed Project, is subject to the Modified Air Quality Management Plan, which was adopted in 2010, and the 2018 State Implementation Plan for PM₁₀. The control strategies discussed in these air quality plans are based on regulatory controls aforementioned in the regulatory setting. The purpose of the proposed Project is to replace the existing deteriorating bridge with a new Precast Pre-stressed Concrete Girder Bridge. It would not induce population growth and as such, the proposed Project would not conflict with any applicable air quality plans. The minor amounts of emissions generated during operation from worker trips will not impede attainment of the NAAQS or CAAQS by the ICAPCD. As a result, this impact would be less than significant.

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

b) PM₁₀ and PM_{2.5} emissions during all constructive phases will be minimized because the proposed Project will be required to implement the standard air quality and dust control measures of the ICAPCD Regulation VIII, including Rule 800 (General Requirements for Control of Fine Particulate Matter), Rule 801 (Construction and Earthmoving Activities), Rule 802 (Bulk Materials), Rule 803 (Carry- Out and Track- Out), Rule 804 (Open Areas), and Rule 805 (Paved and Unpaved Roads).

Construction of the Project is anticipated to commence ~~at the beginning of 2024~~ in 2026 and is estimated to occur over eight months. Construction phases include land clearing, grading and excavation, drainage, utilities and sub-grade, and paving. NOx and PM emissions will be generated from offroad construction equipment exhaust, soil disturbance as well as other criteria pollutant emissions from construction worker vehicles, transport vehicles for materials and supplies, removal of construction debris, and other on-road mobile sources. Emissions were estimated using CalEEMod Version 2022.1.1.19. Summaries of emission calculations and project assumptions are provided (Appendix A, Construction Details & CalEEMod Report).

Depending on the construction phase, project construction emissions may vary from day to day but will not exceed ICAPCD construction thresholds as summarized below in Table 3. Thus, project construction emissions will not contribute to an existing or projected air quality violation. As a result, this impact would be less than significant.

Table 3: Project Maximum Daily Construction Emissions (pounds/day)

	VOC	Nox	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions (lb/day)	7.28	63.69	67.01	0.13	85.01	10.96
ICAPCD Significance Thresholds (lb/day)	75	100	550	150	150	55
Threshold Exceeded	No	No	No	No	No	No

Currently, at the proposed site, trucks are being detoured because of the weight restriction on the deteriorating bridge. As a result, there will not be an increase of motor vehicles traffic over the bridge or in the surrounding community. Any operational-related emissions may be generated by occasional worker visits for maintenance and repairs. These operational emissions will not exceed ICAPCD thresholds described in Table 1. Thus, project operations will not contribute to an existing or projected air quality violation. As a result, this impact would be less than significant.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Expose sensitive receptors to substantial pollutants concentrations?	☐	☐	☒	☐

c) The nearest sensitive receptors are approximately 0.5 miles away from the Project Site. Sensitive receptors located along the project corridors include a Clinic and Quechan Tribal territory. During construction, diesel equipment may contribute to diesel particulate matter (DMP), which is a toxic air contaminant in California. However, according to the California Office of Environmental Health Hazard Assessment and their adoption of Air Toxics Hot Spots Program Guidance Manual used for risk assessments, the risks associated with exposure to substances with carcinogenic effects are based on a dose-response assessment of a lifetime of chronic exposure. This is characterized as 24 hours a day, 7 days per week, 365 days per year for a 70-year exposure. Nevertheless, equipment used in construction would emit temporary diesel exhaust concentrations are not considered substantial emissions and would be less than significant and minor. Similarly, traffic volumes would not increase and long-term operational impacts on sensitive receptors would be less than significant.

d Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)	☐	☐	☒	☐
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d) The proposed Project would not create objectionable odors affecting a substantial number of people. Project construction would result in the emission of diesel fumes and other odors typically associated with construction activities. Odors are highest near the source and would quickly dissipate off the site. Any odors associated with construction activities would be transient and would cease upon completion. The proposed Project is located in an area designated for agricultural use with minimal residences in the vicinity. Therefore, Project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

This site is located within the Colorado Desert which is a subdivision of the larger Sonoran Desert and covers approximately 7 million acres. The desert encompasses Imperial County and includes parts of San Diego County, Riverside County, and a small part of San Bernardino County. This site is in Imperial County. This desert lies at a relatively low elevation, below 1,000 feet, with the lowest point of the desert floor is 275 feet below sea level at the Salton Sea; northeast of the site. The highest peaks of the Peninsular Ranges which reach elevations of nearly 10,000 feet are to the west of the site. The Colorado Desert's climate differs from other deserts. The region experiences greater summer daytime temperatures (up to 120°F) than higher elevation deserts and rarely experiences frost. In addition, the Colorado Desert experiences two rainy seasons per year usually in the winter and late summer in this portion. This area is within the agricultural portion that is irrigated by Colorado River water delivered through water conveyance structures maintained by the Bureau of Reclamation, Bard Water District and Yuma County Water Users. This Picacho Road Bridge spans the Yuma Main Canal which carries irrigation water to local farmers.

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?	☐	☒	☐	☐
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a) The proposed Project does not impact or modify habitat that would have a substantial adverse effect of 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. The top of the bridge is asphalt, heavily travelled and is not biologically sensitive. In regard to special-status plant species, a search of the Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle, listed 10 botanical species within the Quadrangle searched. None would be expected to be found within the Project Site. In regard to special-status animal species, a search of Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle listed 37 zoological species within the Quadrangles searched. Of these, two species: Gila woodpecker (*Melanerpes uropygialis*) and Burrowing owl (*Athene cunicularia*) were noted. Burrowing owls could be expected outside the proposed Project setting but were not observed during survey (See Biological Resources Survey, Appendix B). Gila woodpeckers could potentially be found roosting or nesting in palm trees present off site. Therefore, it is expected that less than significant impact would occur with mitigation measures Biol-1 and Biol-2 added. To address the potential for the project to impact to candidate, sensitive, or special status species, the Project would implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5 described below. With implementation of these mitigation measures, impacts to candidate, sensitive, and special status species would be less than significant.

MM BIO-1: Pre-Construction Nesting Bird Survey ~~Nesting surveys by qualified biologists during nesting season (February~~

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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through August); preferably time construction during non-nesting season (September through January). Time-nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities. If construction or other Project activities are scheduled to occur during the bird breeding season (February 1st through August 31st for raptors and March 15th through August 31st for the majority of migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified avian biologist. The pre-construction survey shall be completed no more than 7 days prior to initial ground disturbance activities and shall include all suitable habitat, including trees, shrubs, burrows, cavities, and structures, within the Project Site and the Project buffer area (100 feet from the edge of grading). To avoid direct impacts to avian species, removal of habitat that could support nests shall occur during the non-breeding season (September 1st through January 31st). Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nesting locations and nesting behavior (including but not limited to copulation, carrying food or nesting materials, nest building, agitation, aggressive interaction, feigning injury, or distraction displays), and non-nesting behavior (including but not limited to foraging or habitat defense). The results of the pre-construction survey shall be submitted to CDFW for review and approval prior to initiating any construction activities. If nesting birds or active nests are detected, the avian biologist shall establish an appropriately sized no-work buffer zone around the nest, which will be based upon the biologist's best professional judgment, the bird's displayed behavior (agitation or stress), the nesting species, its sensitivity to disturbance, nesting stage and expected types, and the intensity and duration of disturbance. The no-work buffer zone shall be clearly marked but should not alert predators. Construction activities shall not occur within any no-work buffer zone until the young birds have successfully fledged and the nest is deemed inactive by the qualified avian biologist.

MM BIO-2: Worker Environmental Awareness Program (WEAP) training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW):

- Biology and status;
- Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas;
- Reporting procedures to be used if a species is encountered in the field; and driving procedures and techniques, for commuting, and driving on, to the Project Site; and

Identification of nesting birds and procedures to follow if nesting is suspected. Prior to the start of construction activities, including any vegetation clearing activities, a qualified biologist shall implement a Worker Environmental Awareness Program (WEAP) for all persons employed or otherwise working on the Project Site. The WEAP shall consist of a presentation that includes a discussion of the biological resources, including the habitats and species that may be present on the Project Site or within a 150-meter (500-foot) buffer area, including but not limited to western burrowing owl (*Athene cunicularia hypugaea*), Gila woodpecker (*Melanerpes uropygialis*), California leaf-nosed bat (*Macrotus californicus*), Pallid bat (*Antrozous pallidus*), and Townsend's big-eared bat (*Corynorhinus townsendii*). The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present within the Project Site or within a 150-meter (500-foot) buffer area, legal protections for those species, penalties for violations, and avoidance, minimization, and mitigation measures. The WEAP shall include: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the Project area; (2) training to identify invasive plant species and methods to avoid the spread of invasive plants on and around the Project Site; (3) information on special-status species that have the potential to occur on the Project Site or within a 150-meter (500-foot) buffer area; (4) reporting procedures to be used if any special-status species are encountered within the Project Site or within a 150-meter (500-foot) buffer area; Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work within the Project Site or within a 150-meter (500-foot) buffer area.

MM BIO-3 Western Burrowing Owl Surveys and Avoidance:

• **Focused Burrowing Owl Survey**

To avoid construction-level impacts to unidentified burrowing owls within the Project Site, a qualified biologist shall conduct a focused burrowing owl survey in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). The survey shall cover the Project Site and a 150-meter (500-foot) buffer area, where suitable habitat exists and where legally accessible. If the survey results are positive (i.e., active burrows are found), the County shall coordinate with CDFW in the preparation of a Burrowing Owl Protection and Mitigation Plan (described below) to allow commencement of disturbance activities within the Project Site. A pre-construction survey shall be conducted within 14 days prior to the start of construction activities (see below).

• **Pre-Construction Survey and Avoidance Measures**

Depending on the Project activity type and associated disturbance, a minimum avoidance buffer distance of 50 meters (165 feet) to 100 meters (330 feet) during the non-breeding season (September 1st through January 31st) and 100 meters

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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(330 feet) to 150 meters (500 feet) during the breeding season (February 1st through August 31st) shall be maintained between active burrows and construction activities. A qualified biologist shall monitor the burrowing owls for any sign of distress and adjust the buffers as necessary to ensure no take occurs.

Pre-construction take avoidance surveys for this species shall be conducted within 14 days prior to the start of ground disturbing activities, including vegetation clearing) and 24 hours prior to construction to determine the presence or absence of this species within the Project Site. A report shall be submitted by a qualified biologist to CDFW. The Project Site shall be clearly demarcated in the field prior to the commencement of the pre-construction take avoidance surveys. The surveys shall follow the guidance of the Staff Report on Burrowing Owl Mitigation (CDFG, 2012).

• Impacts to Active burrows, Permitting and Mitigation Requirements

If active burrows are present within the Project Site and complete avoidance is infeasible, construction activities, including but not limited to vegetation clearing, shall be postponed until the appropriate authorization (i.e. CESA incidental take permit under the California Fish and Game Code § 2081) is obtained.

Should permanent loss of western burrowing owl habitat occur, preservation of suitable burrowing owl habitat at a minimum ratio of one to one (1:1) shall be acquired and permanently preserved for each acre of suitable habitat lost. The ratio shall be higher for occupied and irreplaceable habitats. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Permanent protection of mitigation land shall be established through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.

MM BIO-4 Pre-Construction Plant Surveys:

Prior to the start of construction, a qualified biologist shall conduct a botanical field survey following the methodology described in Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW, March 2018). The survey shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of areas proposed for disturbance and indirectly impacted by the Project. The results of the survey shall be documented in a letter report that will be submitted to ICPDS and CDFW. If special-status plant species are observed during the pre-construction rare plant survey within the Project Site or Project buffer area (100 feet from the edge of grading), the Project shall reduce impacts to these species through the establishment of buffers, to the extent feasible. Buffer distances shall be determined by the Project biologist and Project engineer, typically 50 feet or greater from an identified special-status plant species, unless the qualified biologist determines a reduced buffer would suffice to avoid impacts to the species.

If avoidance of special-status plant species is not feasible, a Special-Status Plant Relocation Plan shall be developed and implemented. The Special-Status Plant Relocation Plan shall address mitigation for special-status plants, including but not limited to: topsoil salvage to preserve seed bank and management of salvaged topsoil; seed collection, storage, possible nursery propagation, and planting; salvage and planting of bulbs as feasible; location of on-site receptor sites; and land protection instruments for receptor areas. The Special-Status Plant Relocation Plan shall include methods, monitoring, reporting, success criteria, adaptive management, and contingencies for achieving success. The plan shall be prepared for CDFW's review, approval, and implementation prior to the commencement of construction activities, including any habitat clearing activities.

All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map and included on the construction plans.

BIO-5 Pre-Construction Focused Bat Survey:

All suitable roosting and foraging habitat for local or migratory bat species, including special-status species, shall be surveyed within the Project Site or Project buffer area (100 feet from the edge of grading) within 14 days prior to the start of construction, including any habitat clearing activities. The survey shall be completed by a qualified bat biologist. The Survey shall include determination of the approximate size of the colony(s) and species present. The survey shall include a combination of nighttime emergence counts and acoustic techniques (full spectrum bat acoustic detectors) appropriate for the roosting habitat and time of year, visual and aural surveys (observation during foraging period), and inspection for suitable habitat and bat sign (e.g. guano).

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
<u>If roosting bats, of any status, are found during the survey, the bats and roosts shall be avoided to the maximum extent practicable with consideration of the most disturbing Project activities and their effect (e.g. demolition and night-time lighting). A Bat Management Plan prepared by the qualified bat biologist identifying situation-specific and species-specific avoidance and minimization measures to reduce impacts to roosting and foraging bats shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. The Bat Management Plan shall include, as appropriate to the findings of the surveys and roosting habitat affected, a construction schedule to avoid roosting season, spatial and temporal avoidance measures, non-disturbance buffers, passive exclusion of bats outside of the maternity season (if necessary), and identification of species-specific replacement or alternative habitat to mitigate for permanent maternity or night roosting habitat loss. If roosts cannot be avoided or it is determined that construction activities will cause roost abandonment, a mitigation plan addressing exclusion and passive relocation procedures and impact compensation will be developed. The mitigation plan will be developed in consultation with CDFW and the qualified bat biologist. Roost and foraging habitat shall be replaced in-kind prior to any exclusion or in a timing approved by CDFW. Any exclusion and passive relocation efforts shall avoid periods of sensitive activity (e.g. hibernation or maternity season) and may require several seasons for bats to discover alternative roosting sites.</u>				
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?	☐	☐	☒	☐
b) The proposed Project does not have the potential to have significant impact on any riparian, or other sensitive natural community as identified in local or regional plans, policies or regulations. The proposed Project activities take place over and near the Yuma Main Canal. BMPs are set forth to ensure no work will occur in or come in contact with the water in the Yuma Main Canal. Areas outside of the project footprint will be designated as an "Environmentally Sensitive Area" (ESA) on project plans. No project-related activities will take place within the ESA-designated areas. <u>It is expected less than significant impacts would occur from the proposed Project. Therefore, impacts to riparian habitat or other sensitive natural communities would be less than significant.</u>				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
c) The proposed Project does not have the potential to have adverse effects on any wetlands. There is no proposed removal, filling, hydrological or any other activities in the proposed Project's description that would have an impact on any state or federal wetlands. BMPs are set forth to ensure no work will occur in or come in contact with the water in the Yuma Main Canal. <u>Therefore, impacts would be less than significant. Therefore, less than significant impact would occur.</u>				
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
d) The proposed Project includes the removal and construction of a bridge that spans over the Yuma main Canal on Picacho Road. No work is expected to occur in the water or impact the water in any way. Therefore, no fish species are expected to be impacted by the proposed Project. Additionally, the habitat is divided by Picacho Road (S24) which runs from I-8 to Bard, CA. Picacho Road can be accessed by wildlife. There are no known wildlife corridors or native wildlife nursery sites with the proposed Project, therefore, construction activities would not impede the use of native wildlife nursery sites <u>with implementation of Mitigation Measure BIO-1, impacts would be less than significant impact with mitigation. The project includes Mitigation Measures BIO-1 through BIO-5 to address potential impacts to candidate, sensitive, or special status species. With implementation of these Mitigation Measures, impacts would be less than significant.</u>				
e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
e) The proposed Project does not fall within an area that the County has designated having development restrictions or prohibitions to facilitate conservation of biological resources or other sensitive resources. Such Critical Habitat is designated to ensure the protection of the Desert pupfish, Razorback sucker, Desert tortoise, Peirson's milk-vetch, Peninsular bighorn sheep and Yellow-billed cuckoo. None of these species were observed within the Project Site during the biological survey performed (Attachment B). No additional species of concern listed as rare under the Conservation and Open Space Element				

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Imperial County are expected to be impacted by the proposed Project. California Species of Special Concern are of particular conservation focus on Imperial County including the burrowing owl are expected to have less than significant impact with implementation of Mitigation Measures BIO-21 through BIO-5. ~~Less than significant impact with mitigation to biological resources are expected~~ With implementation of these Mitigation Measures, impacts would be less than significant.

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

~~f) There are no proposed permanent or temporary impacts to the Yuma Main Canal as a result of the proposed Project. The proposed Project occurs outside of any area designated and an "Environmentally Sensitive Area" (ESA) on project plans. The proposed Project does not conflict with any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State HCP. The proposed Project does not conflict with the California Endangered Species Act (CESA). Less than significant impact is expected to occur. The project includes Mitigation Measures BIO-1 through BIO-5 to address potential impacts to candidate, sensitive, or special status species. With implementation of these Mitigation Measures, impacts would be less than significant.~~

V. CULTURAL RESOURCES

Would the project:

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

a) Picacho Road Bridge over Yuma Main Canal was constructed in 1925 and rehabilitated in 1947 and is a California Historic Bridge (California Historic Bridge Inventory). The existing bridge was put in place in 1947 and meets the age criteria to be considered as an above ground historic resource. However, previous evaluation has recommended this structure as not eligible for the National Register of Historic Places with the implementation of mitigation measures CUL-1 as recommended in the Cultural Report (See Cultural Report, Appendix C). The proposed Project will not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 with mitigation in place. There would be less than significant impact with mitigation.

MM CUL-1: In all phases of construction work an Inadvertent Discovery Plan should be developed and shared with staff on-site. If archaeological or cultural resources are encountered during project work, all work in the immediate vicinity of the find will be suspended until assessed by the qualified archaeologist and a treatment is determined.

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

b) The proposed Project will not likely cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The proposed Project area likely saw significant levels of precontact and historic activity due to its position in and adjacent to a road and bisected by a large canal. The entire Project Site has undergone significant ground disturbing activities related to construction activities (excavation, fill placement, dredging, etc.). For these reasons, the potential for the discovery of intact cultural resources is anticipated to be low. However, there is always a possibility of archaeological discovery, and it was anticipated that if found, cultural resources would most likely be pre-contact artifact scatters or isolates related to resource acquisition areas, historic artifacts related to canal construction and/or general household refuse related to historic-period dumps near the roadway. Therefore, with the implementation of mitigation measure CUL-1 there would be less than significant impact with mitigation.

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

c) There are no noted findings of human remains, including those interred outside of formal cemeteries. Additionally, no formal cemeteries occur within the proposed Project footprint. Should any human remains be found during construction, mitigation measure CUL-2 as recommended in the Cultural Report (See Appendix C) would be implemented. Therefore, impacts to human remains would be less than significant with mitigation.

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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MM CUL-2: Should human remains be encountered during ground disturbing activities; all work will cease, and the County Medical Examiner will be contacted.

VI. ENERGY

Energy for the Project Site is supplied by Imperial Irrigation District (IID). IID serves approximately 158,000 customers in an approximately 6,417-square-mile service area. IID controls more than 1,100 megawatts of energy from various resources.

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? ☐ ☐ ☒ ☐

a) Construction of the proposed Project would require the use of energy in the form of gasoline and diesel for equipment and transportation of materials. However, the use of fuel for construction would not be on such a large scale that it would be wasteful or affect local or regional energy supplies. Energy used for short-term construction activities would improve infrastructure and reliability as a transportation route. As such, construction impacts would be less than significant due to their temporary nature. The electricity use would be relatively minimal compared to the overall electricity usage in the YCWUA service area and would not be considered wasteful, as the proposed Project would support compliance with them. Operation impacts would be less than significant.

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

b) No state or local plans for renewable energy or energy efficiency are applicable to the proposed Project. The proposed Project proposes the replacement of the existing bridge on Picacho Road. As discussed above, the proposed Project will consume energy during construction, but upon completion of the construction, it will return to a similar footprint (transportation infrastructure). There will be no energy consumption after construction or components that require renewable energy or energy efficiency, therefore no impact will occur.

VII. GEOLOGY AND SOILS

The proposed Project is located near the Townsite of Winterhaven in Imperial County. Imperial Valley is a broad, flat, alluvial area located between Southern California and the Colorado River. The regionally extensive faults trend that controls the topography is the San Andreas Fault. The San Andreas Fault is located approximately 80 miles northwest from the Project Site. The proposed Project area falls within the USGS Yuma West and East 7.5-minute quadrangles. In the vicinity of the proposed Project, the subsurface is composed of Quaternary-age alluvium/colluvium that is characterized as loosely consolidated deposits consisting of sand, silt, and clay. The proposed Project is located on Holtville Clay, Indio silt loam (0 to 1 percent slopes), Lagunita loamy sand, and Ripley silt loam.

Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including 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? ☐ ☒ ☐ ☐

1) The proposed Project is located on the bridge on Picacho Road near the Townsite of Winterhaven. Despite the fact that the Project Site is within an active seismic area in southern California, the proposed Project Site has not been evaluated by the California Earthquake Hazards Zone Application for Alquist Priolo Fault Zones, Landslide Zones, or Liquefaction. It is unknown if the proposed Project is underlain by active, potentially active, or inactive faults, nor is the area within an Alquist-Priolo Earthquake Fault Zone. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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MM GEO-1: Prior to earthmoving activities, a certified geotechnical engineer or equivalent, shall perform a final geotechnical evaluation of the soils. The evaluation will follow the requirements of California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2. related to expansive soils and soil conditions. The structural design, tests, inspections, soils and foundation standards will be in accordance with requirements from California Building Code Title 24, Part 2, Chapter 16, 17, and 18. The final geotechnical evaluation shall include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures, including threats from liquefaction, subsidence, lateral spreading, or collapse. The grading and improvement plan for each phase of the project shall be designed in accordance with the recommendations provided in the final geotechnical evaluation.

- 2) Strong Seismic ground shaking? ☐ ☒ ☐ ☐

2) Despite the fact that the Project Site is within an active seismic area in southern California, the proposed Project Site has not been evaluated by the California Earthquake Hazards Zone Application for Alquist Priolo Fault Zones, Landslide Zones, or Liquefaction. It is unknown if the proposed Project is underlain by active, potentially active, or inactive faults, nor is the area within an Alquist-Priolo Earthquake Fault Zone. Given the regional faults of the proposed Project area, it could be subjected to potential seismic hazards including rupture, ground shaking, and ground failure. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.

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

3) Seismically induced liquefaction of soils is a potential geologic hazard, given the proximity of the major fault zone. Liquefaction involves the sudden loss in strength of saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loadings, such as produced by an earthquake. Liquefaction can cause vertical and lateral ground displacements, slope instability, lateral spreading, and bearing failure. During strong ground shaking, soil grains may become more tightly packed due to the collapse of voids or pore spaces. This type of failure typically occurs in loose, granular, cohesionless soil and can occur in either wet or dry conditions. There could be potential for liquefaction at the surface, but it would require extreme wet or flood events. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.

- 4) Landslides? ☐ ☒ ☐ ☐

4) Given the flat topography (average slope of 4.3%) of the proposed Project area, there is no indication that landslides would affect the proposed Project. Due to the lack of information on fault zones, landslide zones, and liquefaction from the DOC, Mitigation Measure GEO-1 shall be implemented to determine if the Project Site encompasses soils or subsurface geology that results in hazards. With Mitigation Measure GEO-1 less than significant impact would occur relative to this issue.

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

b) The majority of soil disturbance would occur in previously disturbed areas, and ground disturbance would be limited. Disturbed soils would be exposed to erosion during construction as soils loosen and become susceptible to the effects of wind and precipitation events. However, the proposed Project is not expected to result in substantial soil erosion due to the current conditions of the Project Site and through the implementation of standard erosion control BMPs. Construction activities would result in temporary soil disturbance throughout the proposed Project Site due to excavation, but the Project Site will be restored to the current elevation and similar existing conditions upon completion. No erosion is anticipated to occur during normal operations and maintenance of the proposed Project. Because of these reasons, the construction and operation of the proposed Project would have a less than significant impact resulting from erosion or topsoil loss.

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

c) As discussed above in (a), it is unknown if the proposed Project is located on soil or subsurface geology that could result in hazards. The proposed Project includes the enhancements and construction to the existing bridge and associated

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
infrastructure, which includes an essential service. To evaluate subsurface foundation conditions the Project Site Mitigation Measure GEO-1 will be implemented, and any hazards corrected. With Mitigation Measure GEO-1, a less than significant would occur.				
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?	☐	☒	☐	☐
d) The Project Site has not been evaluated for expansive soils as defined in Table 18-1 B of the Uniform Building Code (1994). To determine and evaluate what lies beneath subsurface foundation conditions the Project Site Mitigation Measure GEO-1 will be implemented, and any hazards corrected. With Mitigation Measures GEO-1, a less than-significant impact will occur.				
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?	☐	☐	☐	☒
e) The proposed Project's bridge replacement would not include the construction of septic tanks or wastewater disposal systems. Portable toilets will be provided to workers on the Project during the construction phase. Therefore, the proposed Project would have no impact with regard to wastewater disposal systems.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
f) The proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Based on a review of a published geologic map (USGS Yuma West and East 7.5-minute quadrangles), the bridge is surrounded by Alluvial rock mapped as Older Alluvium (Qc) and Alluvium (Ql). This unit is not known to have paleontological resources. Therefore, less than significant impacts would occur.				

VIII. GREENHOUSE GAS EMISSION

Emissions of Greenhouse Gases (GHGs) contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. Greenhouse gases include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), sulfur hexafluoride (SF₆), ozone, and water vapor. For the purposes of this analysis, emissions of carbon dioxide, methane and nitrous oxide were evaluated because these gases are the primary contributors to global climate change for developmental projects such as the proposed site.

The total California GHG emissions in 2020 were approximately 369.2 million metric tons (MMT) of carbon dioxide equivalents (CO₂e). The transportation sector remains the largest source of GHG emissions in the state of California at approximately 37% of the total emissions. Specifically, the largest groups that account for the highest GHG emissions in the transportation sector are passenger vehicles accounting for approximately 26% and heavy-duty vehicles accounting for about 9%. In addition, the industrial sector accounts for approximately 20%.

Would the project:

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

a) Emissions were estimated using CalEEMod Version 2022.1.1.19. Summaries of emission calculations and project assumptions are provided in Attachment A. While construction equipment would emit minor amounts of CH₄ and N₂O, the predominant GHG emissions during construction would be from CO₂. The majority of these CO₂ emissions would be from construction equipment being used at the proposed site. Table 4 shows the unmitigated estimated GHG emissions from construction activity from the proposed site.

Table 4: Construction GHG Emissions

Construction Phase	GHG Emissions 2023 (tonnes/Metric Tons) Per Phase				
	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
Total Construction	661.63	0.03	0.006	0.06	664.27

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Amortized Construction Emissions			22.13	
SCAQMD Interim Threshold			3,000	
Exceedance?			No	

The persistence of GHG in the atmosphere defines the impact of the proposed site as long-term. The GHG emissions from construction are amortized over the next 30 years and added to operational emissions in order to estimate annual emissions. However, it is not anticipated that there will be a significant increase in vehicle miles traveled (VMT) because the project is not adding capacity (e.g., additional lanes) to Picacho Road or creating a more direct route between two destinations. Thus, there will be a negligible increase in operational GHG emissions. The annual construction emissions are predicted to be approximately 22 tonnes per year including all operational emissions. As discussed in the *Regulatory Setting* of this analysis, SCAQMD states that proposed sites that generate GHG emissions below 3,000 tonnes CO₂e, it can be concluded that GHG emissions are not “cumulatively considerable”. Based on the above, the proposed Project would not be considered to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the proposed Project’s impacts related to GHG emissions would be less than significant.

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

b) Neither the ICAPCD nor the County of Imperial has adopted a climate change action plan, as such the only applicable plan for reducing GHGs is the California Air Resources Board’s (CARB)’s *2017 Climate Change Scoping Plan* which indicates strategies for California’s 2030 greenhouse gas target of reducing GHG emissions by 40% below 1990 levels by 2030. Table 5 shows the feasible mitigation measures for individual projects provided in the CARB’s 2017 Scoping Plan.

Table 5: Consistency with CARB’s 2017 Scoping Plan Measures for Individual Projects

Measures from Scoping Plan	Project Consistency
Enforce idling time restrictions for construction vehicles.	Consistent. All utilized off-road equipment will be registered with CARB and meet idling requirements.
Require construction vehicles to operate with the highest tier engines commercially available.	Consistent. The project will require all off-road equipment greater than 50 horsepower to utilize Tier 4 equipment when commercially available.
Divert and recycle construction and demolition waste and use locally sourced building materials with a high recycled material content to the greatest extent feasible.	Consistent. The project will adhere to Title 24 Part 11 requirements that require diversion of a minimum of 65% of construction waste from landfills.
Minimize tree removal and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance.	Consistent. Implementation of the project would result in landscaping that adds more vegetation to the project site where possible.
Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators.	Consistent. Where possible electrical service will be utilized.
Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available.	Consistent. Alternative-fueled construction equipment will be used where possible.
Require diesel equipment fleets to be lower emitting than any current emissions standard.	Consistent. Alternative-fueled/lower emitting construction equipment will be used where possible.

Where feasible, the project would implement the CARB 2017 Scoping Plan Measures described above throughout the project’s construction process to reduce GHG emissions. Additionally, where feasible, the project would implement ICAPCD measures described below for reducing criteria pollutant emissions from construction emissions which would also reduce GHG emissions:

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy-duty equipment and or the amount of equipment in use.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Replace fossil fuel equipment with electrically driven equivalents (provided they are not run via a portable generator set)				

The above measures would be implemented as part of the construction permitting process for the proposed Project. Therefore, the proposed Project would not conflict with any applicable plan that reduces GHG emissions. Impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

Hazardous substances are defined by federal and State regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261, which provides the following definition: A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed. This section considers the potential for human health hazards or exposure of people to existing sources of potential health hazards from the proposed Project.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered a hazardous waste if it exceeded specific California Code of Regulations (CCR) Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soil or groundwater at a contaminated site do not have the characteristics required to be defined as hazardous wastes, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking the lead jurisdiction. The proposed Project does not expect to generate any reportable quantities of hazardous materials. According to the DTSC ENVIROSTOR Mapping Tool, there are no active hazardous waste clean-up sites within 1,000 feet of the proposed Project.

Would the project:

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

a) Construction would involve the use of heavy equipment, which utilizes fuels and lubricants; however, the quantities involved would not create a significant hazard to the public or the environment and are considered temporary. During the construction, the old bridge would be disposed of to a local municipal waste facility. Municipal waste facilities or construction debris facilities cannot accept hazardous waste. It is unknown if the materials from the old bridge pose a hazard; therefore, the County would prepare and implement Mitigation Measure HAZ-1 which includes the County or construction contractor submitting a test and disposal plan for all wastes generated during demolition to the local municipal waste facility or debris facility. If the waste is deemed hazardous, it will be transported to a hazardous waste facility with a hazardous waste manifest. With Mitigation Measure HAZ-1, impacts from construction would be mitigated to less than significant levels.

MM HAZ-1: All construction contractors shall immediately stop all surface or subsurface activities in the event that potentially hazardous materials are encountered, such as an odor is identified, or considerably stained soil is visible. Contractors shall follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. These requirements shall be included in the contractor's specifications. If any hazardous materials, waste sites, or vapor intrusion risks are identified prior to or during construction, a qualified professional, in consultation with appropriate regulatory agencies, will develop and implement a plan to remediate the contamination and properly dispose of the contaminated material. If material imports are proposed, the contractor shall furnish the County of Imperial or its representative with appropriate documentation certifying that the imported materials are free of contamination.

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

b) The proposed Project would require the use of heavy equipment, such that a potential exists for the release of fuels and/or lubricants during construction and operation; however, the County or its contractor would have an approved Spill Prevention Countermeasure and Control (SPCC) Plan, which is a standard BMP as a special provision in the construction contract(s), to

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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address any release that may occur. The SPCC Plan and BMPs would be included as part of the construction Stormwater Pollution and Prevention Plan (SWPPP) required for construction. Furthermore, in compliance with applicable laws and regulations, the County would prepare and implement Mitigation Measure HAZ-2 which includes a BMP Maintenance Plan with maintenance practices such as the periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to subsoils and groundwater.

MM HAZ-2: Imperial County shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to subsoils and groundwater. A BMP Maintenance Plan shall be prepared by Imperial County upon approval of the BMP projects that identify the frequency and procedures for removal and/or replacement of accumulated debris, surface soils, and/or media (to a depth where constituent concentrations do not represent a hazardous condition and/or have the potential to migrate further and impact groundwater) to avoid the accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsoils and groundwater. Structural BMPs shall be designed to prevent the migration of constituents that may impact groundwater.

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

c) No schools are located within one-quarter mile of the proposed Project. The nearest school is Yuma High school, located approximately 1.2 miles south of the proposed Project. No impacts would occur.

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

d) The proposed Project is not a listed hazardous materials site pursuant to Government Code §65962.5 (Cortese List), and none of the proposed improvements would cause the Project Site to be listed as a hazardous materials site. Additionally, no sites were located within 1,000 feet of the proposed Project location.

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

e) No public airports are located within the vicinity of the proposed Project. The closest public airport is located approximately 5 miles from the proposed Project (Yuma International Airport). The proposed Project is not in an airport land use plan or within two miles of a public airport or public use airport. No impact would occur.

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

f) The proposed Project would not cause any changes that would impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Construction activities will primarily take place near the existing bridge. A detour route is currently used to avoid driving on the bridge due to its poor condition. Construction activities in the public right-of-way are considered temporary and will require a construction traffic control plan to minimize access disruptions. With the implementation of a traffic control plan, construction impacts would be less than significant. After the project is completed, the site will be returned to existing conditions and would not have an impact relative to emergency response plans or emergency evacuation plans.

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

g) The CALFIRE Fire Hazard Severity Zone (FHSZ) Maps identify areas with high and very high fire hazard severity categories. The proposed Project is located within an Urban Unzoned area (COSFM 2022). Although the construction equipment has the

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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potential to ignite dry vegetation, the proposed Project would comply with federal and State regulations for construction fire safety, such as California Department of Transportation and California Vehicle Code requirements for spark arrestors on vehicles to minimize the risk of fire during construction. Impacts would be less than significant.

X. HYDROLOGY AND WATER QUALITY

The setting for the proposed Project is Picacho Bridge located near the Townsite of Winterhaven, CA. The Picacho Bridge spans the Yuma Main Canal which is owned by the BOR, and its waters are managed by their partners the YCWUA. The proposed Project will implement a Stormwater Pollution Prevention Plan (SWPPP) during demolition and construction to minimize impacts related to storm water quality and runoff. The County will ensure that no debris, including trash, siltation, or fill material, from construction activities enters the Yuma Main Canal which the bridge spans. The proposed Project is considered a Regulated project under the State's Phase II MS4 Permit, Order No. 2013-0001-DWQ, and is required to prepare a Storm Water Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will be prepared by a Registered Civil Engineer and will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition.

Would the project:

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

a) The proposed Project will implement a Stormwater Pollution Prevention Plan (SWPPP) during demolition and construction to minimize impacts related to storm water quality and runoff. The County will ensure that no debris, including trash, siltation, or fill material, from construction activities enters the Yuma Main Canal which the bridge spans. The proposed Project is required to prepare a Storm Water Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition. The project also does not require any ground water or inject any construction water into the ground. Therefore, impacts to surface or ground water quality would be less than significant.

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

b) The proposed Project would not use groundwater supplies or interfere substantially with groundwater recharge. Therefore, the proposed Project would have no impacts related to groundwater supplies or groundwater recharge.

- 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: ☐ ☐ ☒ ☐

The proposed Project would be limited to Picacho Road Bridge and the surrounding ROW and would not significantly alter the current drainage patterns or significantly change the existing impervious area within the Project Site. Therefore, the proposed Project would have less than significant impacts related to existing drainage patterns, alteration of stream courses, or increases in impervious surfaces.

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

During project construction, erosion could occur as a result of grading, excavation, or other construction activities. Erosion would be minimized through the implementation of a Stormwater Pollution Prevention Plan (SWPPP) as required by the SWRCB's Construction General Permit with standard and project-specific stormwater BMPs such as limiting the amount of disturbed soil, preventing runoff from leaving the project site, minimizing track-out from the project site, and implementing erosion control and stormwater detention measures in advance of rainfall events. Additionally, no earthwork or other soil disturbance activities would occur in nearby waterways. The proposed Project is also required to prepare a Storm Water

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Quality Management Plan (SWQMP) and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the proposed Project would have less than significant impacts related to erosion or siltation on- or offsite.				
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. The proposed Project would not substantially increase the amount of paved surfaces or the rate or amount of surface runoff that would result in flooding on- or offsite. The proposed Project would also implement a SWQMP and incorporate permanent site control and treatment control BMPs to control, dissipate, and treat stormwater runoff. Therefore, the proposed Project would have less than significant impacts related to the rate or amount of surface runoff.				
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;	☐	☐	☒	☐
The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. No significant increase in runoff water is expected to result from the proposed Project. The proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. The proposed Project would also implement a SWQMP and incorporate permanent site control and treatment control BMPs to control, dissipate, and treat stormwater runoff. Therefore, the proposed Project would have less than significant impacts related to runoff water, including polluted runoff.				
(iv) impede or redirect flood flows?	☐	☐	☒	☐
The proposed Project includes the replacement of an existing bridge with a new bridge with a similar alignment to the existing bridge and minor changes to the Picacho Road alignment and paved surfaces. The Project Site is not within an area mapped as a Federal Emergency Management Agency (FEMA) Flood Hazard Zone. Therefore, the proposed Project would have less than significant impacts related to impeding or redirecting flood flows.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
d) The Project Site is not within an area mapped as a FEMA Flood Hazard Zone. The Project Site is also not located in an area subject to potential inundation by seiches, tsunami, or mudflow. Although construction of the proposed Project will involve the use of fuels, paints, and other potential pollutants typically used in the construction process, the Project does not involve the permanent storage of any pollutants that could be released in a flood inundation event. Therefore, the project would have no impacts related to flood hazard, tsunami, or seiche zones or the release of pollutants due to project inundation.				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
e) The proposed Project would not result in conflicts or impacts to implementation of a water quality control plan or sustainable groundwater management plan. . The proposed Project is considered a Regulated project under the State's Phase II MS4 Permit, Order No. 2013-0001-DWQ and is required to prepare a SWQMP and implement permanent treatment control and source control BMPs that manage and treat stormwater runoff from Picacho Road and its intersection with Quechan Road. The SWQMP will be prepared by a Registered Civil Engineer and will describe all site control, source control, and treatment control BMPs that will be implemented by the proposed Project. No existing treatment control stormwater BMPs currently exist within the project footprint. Therefore, the project will result in a net improvement in the water quality of stormwater runoff compared to the existing condition. Impacts would be less than significant.				

XI. LAND USE AND PLANNING

The proposed Project proposes the replacement of the existing bridge. After completing the bridge replacement, bridge and surface

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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improvements would provide safer transportation infrastructure from Winterhaven (to the west) to the Fort Yuma Indian Reservation (to the east). The current land use and zoning will remain.

Surrounding the Project area are farms designated as agricultural lands in the County's General Plan, the Seminole Water Canal (runs west from the Yuma Main Canal), and the Union Pacific Railroad (parallel to the bridge). The land the bridge is located on is zoned as agricultural by the county and Other Land by the DOC. The BOR owns this parcel. Imperial County has an easement and provides transportation for the population over the water canal. The bridge is also under the jurisdiction of the YCWUA, Bard Water District, IID, Imperial County and BIA.

Would the project:

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

a) The proposed Project is proposing the replacement and enhancement of the bridge on Picacho Road (County ROW) that crosses the Yuma Main Canal into the unincorporated Townsite of Winterhaven. The Project Site land is zoned as agriculture by the County and Other Land by the DOC. Surrounding the Project Site is land designated as Agriculture in the County's General Plan and Prime and Unique Farmland by the DOC. The bridge allows access from Winterhaven (west) to the Fort Yuma Indian Reservation (Quechan Drive-east).

The proposed Project provides transportation for the population from the west to the east. The Quechan people heavily utilize Picacho Road and the Quechan Tribe Comprehensive Plan (QTCP) anticipates the future replacement of the bridge. Therefore, the proposed Project is consistent with the QTCP. Project construction would include the closure of the bridge. During construction, Picacho Road between Winterhaven Drive and Quechan Road will be closed to traffic and a detour route will be made available. Detour travel times and lengths will be minimal during construction.

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

b) The proposed Project is in compliance with the land use plan, policy, and regulations of the overseeing agencies. The Picacho bridge and Yuma Main Canal are owned by the BOR. The BOR has a contract which grants various agencies shared jurisdiction over the bridge. This contract gives jurisdiction to the YCWUA, Bard Water District, IID, Imperial County and BIA. None of these agencies have land use plans, policies, or regulations which conflict with the proposed Project. Therefore, no impact is suspected from the proposed Project.

XII. MINERAL RESOURCES

The State of California classifies mineral resource areas into Mineral Resources Zones (MRZ). The four-zone classifications (MRZs 1-4) indicate whether mineral resources (primarily sand and gravel) are known to be present or absent, or whether additional information is necessary. The County does not have any maps available to display the MRZs in the County. The CGS's Aggregate Sustainability in California Map does not display any present or future aggregate resources in the Project Site (CGS 2018). Therefore, no MRZs are located in the Project Site.

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? ☐ ☐ ☐ ☒

a) The proposed Project is located on Picacho Bridge which is located in the unincorporated area of Winterhaven in Imperial County. The Project Site is designated as Agriculture in the County's General Plan and Other Land by the DOC (see Section 3.1.2). The surrounding area of the bridge is zoned as agricultural land by the County and Prime and Unique Farmland by the DOC (see section 3.1.2). The proposed Project proposes the replacement of the existing bridge on Picacho Road.

Imperial County does not have any readily available maps displaying mineral resource zones in the County. However, the CGS's Aggregate Sustainability in California Map does not display any aggregate production areas, permitted reserves, or future aggregate production areas in the Project Site. Therefore, the proposed Project would not 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, and no impacts would occur.

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

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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specific plan or other land use plan?

b) As discussed above, the proposed Project site is located on the Picacho Bridge which is located in the unincorporated area of Winterhaven in Imperial County. There are no locally important mineral resource recovery sites identified by the County or CGS. The land use for the site will remain as is with the proposed improvements and replacement of the transportation bridge. The proposed Project would not 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 and no impacts would occur.

XIII. NOISE

The proposed Project is located in a rural agricultural area with scattered residences. Concentrated residential areas are present in Winterhaven, which is located to the northwest of the Project Site. Sensitive receptors in the Project Site would include Fort Yuma Health Care Clinic 0.4 miles east of the site, Abundant Life Church located 0.5 miles west of the site, rural residences and the residential areas in Winterhaven. Rural residences in the Project Site are no closer than 485 feet to the project boundary. The nearest concentrated neighborhood is 1900 feet from the project boundary.

Existing noise sources in the Project Site include agricultural equipment, vehicular traffic including highway traffic on I-8, and trains on the Union Pacific Railroad (UPRR). I-8 Kumeyaay Hwy runs east and west 0.3 miles south of the Project Site. The UPRR railroad tracks run northwest to southeast in general proximity to Picacho Road and Quechan Road east of the project Site. Typical sound levels for the existing noise sources found in the project area, normalized to a reference distance of 50 feet, are shown in Table 6 below.

Table 6: Existing Noise Sources in Project Site

Noise Source	Sound Level at 50 ft
Agricultural equipment	67-82 dBA (Fretzer, et al. 2022)
Light vehicular traffic	56 dBA (Imperial County 2015)
Highway traffic	70-80 dBA (USDOT FHWA 2003)
Train (horn at road crossings)	116 dBA maximum (USDOT 2009)
Train (locomotive and cars)	83-91dBA (USDOT 2009)

Would the project result in:

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

a) During the long-term operational phase, development of the proposed Project would not result in an increase in noise levels above the existing conditions in the Project Site.

During the proposed Project's short-term construction phase, operation of construction equipment would generate noise. Table 7 shows the typical average maximum noise level of the pieces of equipment expected to be used during project construction at a distance of 50 feet. Noise levels from equipment shown here increase or decrease with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

Table 7: Construction Equipment Noise Levels

Equipment	Maximum Noise Level (dBA) at 50 feet
Bulldozer	82
Boring machine	83
Backhoe	78
Concrete mixer truck	79
Excavator	81
Mud sucker	81

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Skid steer loader	79			
Jackhammer	89			
Medium-duty truck (5 ton)	76			
Air compressor	78			
Pickup Truck	75			

Source: 2011 FHWA Construction Noise Handbook, Table 9.1, actual measured sound levels, samples averaged

The nearest sensitive receptor is a house located 500 feet northeast of the Project Site. However, while all construction activities will be contained within the boundaries of the construction work area, the greatest construction noise is expected to occur at the bridge overpass, which is roughly 860 feet from this residence. Closer to the bridge overpass is another residence located 670 feet directly southeast of the bridge across the Yuma Main Canal. Therefore, it is expected that this residence would experience the greatest noise impact during the short-term construction phase. Exhibit D below demonstrates the respective locations of the nearest homes in relation to the Project Site.

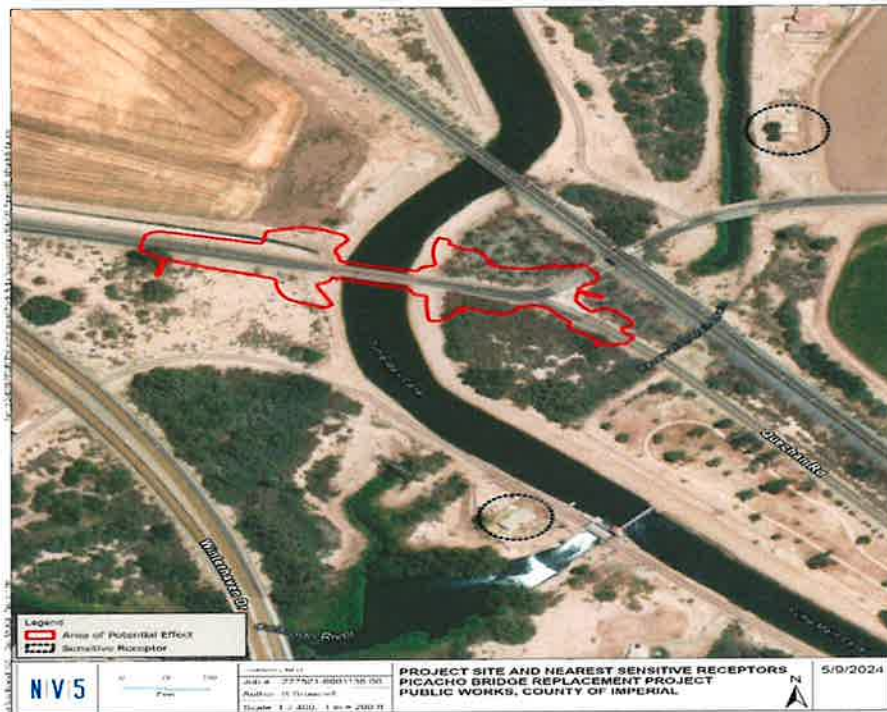


Exhibit D Project Site and Nearest Sensitive Receptors

Given that 600 feet is 50 feet doubled 3.5 times over, the maximum anticipated noise level at the home southeast of the site would be over 21 dBA (3.5 times 6 dBA) lower than the maximum levels shown in Table 7, or approximately 68 dBA for the noisiest pieces of equipment. This level of noise, if it were to persist in one sensitive receptor location over a period of 8-hours, would be lower than the County's 75 dB Leq (8-hour) noise standard.

While unlikely, even if the noisiest piece of equipment were to be used at the most eastern portion of the Project Site and persist over an 8-hour period, the maximum anticipated noise level at the home east of the site would be less than 71dBA (3 times 6 dBA lower than the noisiest piece of equipment).

In addition, construction activities are expected to be limited to the hours of 7 a.m. to 7 p.m. Monday through Friday and 9 a.m. to 5 p.m. on Saturday. Therefore, noise impacts associated with construction would be less than significant.

b) Generation of excessive groundborne vibration or ☐ ☐ ☒ ☐

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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groundborne noise levels?

b) **Vibration is sound radiated through the ground. Groundborne noise is the rumbling sound caused by vibration of building or structure surfaces. Typical outdoor sources of perceptible groundborne vibration are construction equipment and traffic on rough roads. During the long-term operational phase, development of the proposed Project would not result in groundborne vibration or noise levels in addition to the existing conditions in the Project Site. During the short-term construction phase, there may be relatively minor vibrations from the use of trucks or other equipment associated with construction activities. However, given the distance to the closest sensitive receptor (670 feet), this groundborne vibrations condition from construction equipment would be relatively minor, intermittent, short term and restricted to daytime hours. Therefore, impacts related to excessive groundborne vibrations are anticipated to be less than significant.**

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

☐
☐
☐
☒

c) **The proposed Project is not located in the vicinity of an airport land use plan nor within two miles of a public airport. The nearest airport is the Yuma International Airport located five miles southeast of the proposed Project. Therefore, the proposed Project would not expose people residing or working in the Project Site to excessive noise levels and no impact would occur.**

XIV. POPULATION AND HOUSING

This section addresses potential impacts on the population and housing associated with the proposed Project's implementation and includes a description of the existing environment. The proposed Project is located in the unincorporated area of Winterhaven, in Imperial County. The proposed Project is located approximately 60 miles east of El Centro, CA. Housing in the unincorporated portion of Imperial County is covered in the Housing Element. Population size and housing units in Imperial County Housing Element 2021 to 2029 are identified in Table 8 and the demographic composition based on the data provided in the Imperial County Housing Element 2021-2029 is identified in Table 9.

Table 8: Imperial County Population Inventory

	Unincorporated Area*	Total County	Percentage Unincorporated
Population (2020)	37,778	174,528	22%
Housing Units (2020)	35,331	180,378	20%
Household Size (Average) (2019)	n/a	3.81	n/a

* Includes all unincorporated areas beyond just census-designated places

Sources: California DOF, City/County Population and Housing Estimates and 2015-2019 ACS (Imperial County 2022)

Table 9: Unincorporated Imperial County Demographic Composition

Race	Unincorporated Area Population*	Percentage
White alone	58,135	70.9%
Black of African American alone	4,505	2.1%
American Indian and Alaska Native alone	887	1.3%
Asian alone	1,475	0.6%
Native Hawaiian and Other Pacific Islander alone	132	0.2%
Some Other Race alone	11,692	22.8%

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Two or More Races	3,242		2.1%	
total	13,973		n/a	
Hispanic or Latino	10,646		76.2%	
Not Hispanic or Latino	3,327		23.8%	

*Includes only census-designated places in unincorporated Imperial County.

Source: 2015-2019 ACS (Imperial County 2022)

Would the project:

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

a) The proposed Project consists of a bridge replacement for more reliable transportation infrastructure, which would not induce population growth either directly or indirectly. The route is an important transportation route allowing access from the Fort Yuma Indian Reservation to downtown Winterhaven. There would be no impact.

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

b) The proposed Project proposes the replacement of the bridge located on Picacho Road. The proposed Project would not remove or construct housing or result in the displacement of housing available. The proposed project would result in no impacts on the displacement of existing or future housing, and a less than significant impact would occur.

XV. PUBLIC SERVICES

This section addresses potential impacts on the public services associated with the proposed Project's implementation and includes a description of the existing environment.

Fire

The Imperial County Fire Department (ICFD) and the Office of Emergency Services (ICOES) provide medical services (BLS/ALS), fire protection, aircraft fire rescue, technical rescue, and hazards materials and incidents responses for incorporated Imperial County and through contracts to the unincorporated parts of the County. The proposed Project area is served by ICFD Station 8 (518 Railroad Ave, Winterhaven, CA 92283), approximately 1 mile west of the Project Site.

Police

The Imperial County Sheriff's Office (ICSO) provides law enforcement services to the County's unincorporated communities and contract cities. The Project Area is served by the Imperial County Sheriff's Station (513 2nd Ave, Winterhaven, CA 92283), approximately 1 mile west of the Project Site.

The Fort Yuma Quechan Indian Tribe is served by their local Quechan Police Department consisting of two chiefs, two sergeants, nine full-time patrol officers, and six full-time emergency dispatchers. The Quechan Police Department (450 N Quechan Drive Winterhaven, CA 92283) is located approximately less than one-half mile east of the proposed Project.

Schools

The nearest school to the proposed Project site is San Pasqual Valley High School administered by San Pasqual Valley Unified School District (676 Baseline Rd, Winterhaven, CA 92283), approximately 2 miles northeast of the Project Site.

Parks

The proposed Project is located approximately less than a mile from the Quechan Walking Trail Park, providing amenities such as children's playground equipment, picnic tables, benches, an open field, and barbeque areas.

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

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

The proposed Project will improve transportation infrastructure by replacing an existing bridge. Construction and operation of the proposed Project would not affect the area's population or induce population growth, as no habitable structures are proposed, and construction workers are anticipated to be from the local workforce.

1) Fire Protection? ☐ ☐ ☒ ☐

1) The bridge will not be constructed with flammable materials and will not require fire protection services when in operation. During construction, temporary lane closures and traffic detours along Picacho Road are expected and could adversely affect emergency service and response times during Project construction.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed Project would not create a need for new or altered fire or police protection facilities. During construction, temporary lane closures and traffic detours along Picacho Road are expected and could adversely affect emergency service and response times during Project construction.

3) Schools? ☐ ☐ ☐ ☒

3) The nearest schools are at the San Pasqual Valley School District located approximately 1.75 miles northeast of the bridge. The project would not directly increase demand for public schools in the County. The project would not generate employment that would result in a considerable demand for school services. The project would not directly or indirectly induce population growth in the project area that would necessitate the need for new or expanded school services. The proposed Project would not have an effect on schools.

4) Parks? ☐ ☐ ☐ ☒

4) The Quechan Walking Trail Park is located approximately ¼ mile southeast of the bridge. The implementation of the project will not directly or indirectly induce population growth that would create a need for new or expanded park services. The proposed Project would not have an impact on this park.

5) Other Public Facilities? ☐ ☐ ☐ ☒

5) The public facilities include the Fort Yuma Health Care Center and Quechan Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge and the community of Winterhaven is located approximately 0.55 miles west of the bridge. A traffic detour plan will be provided to ensure access between the west and east sides of the bridge. As the project would not directly or indirectly induce population growth, implementation of the project would not create the need for new or expanded public facilities. The proposed Project would not have an impact on other Public Facilities.

XVI. RECREATION

The proposed Project is located on Picacho Bridge which is within County ROW (Picacho Road) and crosses the Yuma Main Canal. Picacho Bridge provides transportation infrastructure for the County. The proposed Project will be located on the bridge and will include the replacement of the bridge. The Quechan Walking Trail Park is approximately half a mile southeast of the proposed Project and is the closest local recreational park under the jurisdiction of the Fort Yuma Reservation. The proposed Project will not have an impact on this park.

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

a) The proposed Project is not likely to increase the use of existing neighborhoods, regional parks, or any other recreational facilities to the point that physical deterioration would occur or be accelerated. The Project proposes to replace the bridge

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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that is already in place, therefore it is expected that once replaced no impact would occur regarding increase in recreations.

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

b) The proposed Project consists of the replacement and enhancement of the existing bridge on Picacho Road (County ROW). The proposed Project will not directly or indirectly incentivize the need for more recreational facilities or increase the use of existing parks. No impact is expected from the result of the proposed Project.

XVII. TRANSPORTATION

The proposed Project is located along Picacho Rd. (S-24) 0.4-miles north of the Colorado River and California/Arizona border in Section 16 of Township 16 South, Range 22 East. The bridge crosses the Yuma Main Canal and serves as a route into the Townsite of Winterhaven. The purpose of the proposed Project is to replace the heavily deteriorated 7-span timber bridge with a new single span structure.

Would the project:

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

a) During the construction of the new bridge along the same alignment as the existing bridge, proposed Project-related traffic would be temporary. Traffic during construction would include workers traveling to and from the Project Site, trucks hauling construction materials to the Project Site, and transporting material off-site. Though the proposed Project would generate construction traffic on the local roadway network and along this section of the road the construction traffic would be temporary and occur throughout the day, generally during non-peak hours. As such, the construction traffic would not generate a substantial impact to the surrounding roadways. Therefore, construction traffic would not be expected to conflict with a program plan, ordinance or policy addressing the circulation system, and impacts would be less than significant.

The County General Plan's Circulation and Scenic Highways Element was adopted in 2008, prior to the closure of the existing bridge. The Circulation and Scenic Highways Element was prepared in conjunction with the Southern California Association of Governments (SCAG) Regional Transportation Plan, "Destination 2030," and other related transportation planning documents (County of Imperial, 2008). The Circulation and Scenic Highways Element included projected street segment configurations and volumes throughout the County, including for Picacho Road, which is designated as a Major Collector Road. Thus, traffic along this section of Picacho and over the bridge was anticipated and accommodated for in the Circulation and Scenic Highways Element. As the new bridge would be within the same alignment and have the same number of lanes as the existing bridge, operation of the proposed Project is not anticipated to generate an increase in traffic beyond the traffic accommodated for in the County's General Plan. Therefore, the proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, and operational impacts would be less than significant.

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

b) CEQA Guidelines 15064.3 states vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. CEQA Guidelines 15064.3 subdivision (b) provides several criteria for analyzing transportation impacts, including analyzing a project's VMT qualitatively when lead agencies may not be able to quantitatively estimate VMT for a project type. The proposed Project would replace an existing deteriorated bridge with a new bridge within the alignment of the existing bridge. The new bridge would have the same number of lanes (one [1] in each direction) as the existing bridge, but wider to compensate for foot and bicycle traffic. Additionally, the Governor's Office of Planning and Research (OPR) has developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which states replacement projects designed to improve the condition of existing transportation assets, including bridges, would not likely lead to a substantial or measurable increase in vehicle travel and, therefore, generally should not require an induced travel analysis (OPR; 2018). Thus, the proposed Project is anticipated to be consistent with CEQA Guidelines section 15064.3 subdivision (b) and impacts are expected to be less than significant.

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

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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c) The proposed Project would consist of the replacement of an existing severely deteriorated bridge with a new bridge designed to applicable County and AASHTO standards. As such, the proposed Project would not include a geometric design feature that would increase hazards or result in incompatible uses. The proposed Project would comply with the standards of Caltrans and ICFD. Additionally, the proposed Project would utilize standards as set out in the California Manual on Uniform Traffic Control Devices for operational traffic control devices as appropriate and would further incorporate traffic control measures that are designed to ensure the safety of all road users. Therefore, the proposed Project would result in less than significant impacts related to hazardous design features or incompatible uses.

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

d) The proposed Project would be designed to applicable County and AASHTO standards and, as a result, provide adequate emergency access. The proposed Project would not reduce the number of traffic lanes or create physical barriers along Picacho Road. Therefore, the proposed Project would not include or create any physical barriers on roadways that would impede emergency access within the area or to the Project Site.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

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

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

☐ ☒ ☐ ☐

(i) No 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) were recorded in the Cultural Report (see Appendix C). The proposed Project is fully within the Fort Yuma Indian Reservation thus tribal consultation was undertaken with the Fort Yuma Quechan Tribe. A meeting was facilitated between the Bureau of Reclamation, Fort Yuma Quechan Historic Preservation Office, and NV5 to discuss requirements for conducting cultural resource projects on Tribal land in Spring 2021. Quechan HPO was granted for the completion of the California Historic Resources Information System search in Summer 2021. Quechan Tribal Historic Preservation Officer staff did not indicate any concern about Traditional Cultural Places within the Project Site. The proposed Project would result in less than significant impacts with the implementation of mitigation measure CUL-1 and CUL-2.

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

☐ ☒ ☐ ☐

(ii) There are no known resources in or near the Project Site that meet the criteria set forth in Public Resources Code Section 5024.1 to qualify for listing on the California Register of Historic Resources. The proposed Project would not cause significant impacts pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, less than significant impact would occur. The proposed Project would result in less than significant impacts with the implementation of mitigation measures CUL-1 and CUL-2.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- a) **No relocation or expansion of water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications is proposed. To accommodate the new elevation of Picacho Road and the bridge, the Project would require a minor adjustment in the horizontal and vertical alignment of IID's distribution Circuit A-66 crossing over and running along the north side of Picacho Road, however these adjustments would be confined to the existing IID easement for this circuit. Thus, there would be no impact.**
- b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ☐ | ☐ | ☒ | ☐ |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- b) **The proposed Project will not generate any new permanent demands on existing water supplies. Minimal water use would be required during construction. Impacts would be less than significant.**
- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ☐ | ☐ | ☐ | ☒ |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
- c) **The proposed Project will not add to wastewater demands. There would be no impact.**
- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| ☐ | ☒ | ☐ | ☐ |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

d) The proposed Project will not add permanently to solid waste demands or generate excessive solid waste. Solid waste generation would occur during construction. Clean soil can be recycled, reused offsite, or reused as backfill thereby reducing the need to be disposed of at a landfill. In addition, through the implementation of Mitigation Measure UTIL-1, the County will encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible, by including waste minimization goals in bid specifications. The proposed Project will adhere to regulations and policies pursuant to applicable State, local, and County relating to solid waste including the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72) for the disposal of the old bridge debris. The impacts would be less than significant with the implementation of Mitigation Measure UTIL-1

MM UTIL-1: Imperial County shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill where feasible. Implementing agencies shall incentivize construction contractors with waste minimization goals in bid specifications where feasible. Upon completion, the proposed Project will not add to solid waste demand or generate excessive solid waste. The proposed Project will comply with federal, state, and local regulations related to solid waste. Impacts would be less than significant with mitigation measures.

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

e) The proposed Project will not add permanently to solid waste demands or generate excessive solid waste. Solid waste generation would occur during construction and would include the demolition debris from the removal of the old bridge and associated paved road surfaces. Clean soil can be recycled, reused offsite, or reused as backfill, thereby reducing the need to be disposed of at a landfill. In addition, through the implementation of Mitigation Measure UTIL-1, the County will encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible, by including waste minimization goals in bid specifications. The proposed Project will adhere to applicable County and state regulations and policies relating to solid waste handling and disposal, specifically the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72). The impacts

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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would be less than significant with the implementation of Mitigation Measure UTIL-1.

XX. WILDFIRE

California Public Resources Code 4201-4204 directs CAL FIRE/State Fire Marshall to classify and map lands within SRAs into Fire Hazard Severity Zones (FHSZ) based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified as a major cause of wildfire spread. FHSZs fall into the following classifications: moderate, high, and very high. NV5 reviewed CAL FIRE's Fire Hazard Severity Zone Viewers (CAL FIRE 2022a and 2022b) and the CAL FIRE State Responsibility Area Fire Hazard Severity Zones map prepared for Imperial County (CAL FIRE 2022c) to see if the Project Site is located within a FHSZ. The viewer and map showed that the Project Site is not located within or adjacent to a designated FHSZ. More specifically, the Project Site is not located within or adjacent to a very high FHSZ.

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

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

a) The California Board of Forestry and Fire Protection is tasked with classifying all lands within California for the purpose of determining the financial responsibility for wildfire protection and suppression. NV5 reviewed the State Responsibility Area Viewer (Board 2022) to see what specific wildfire prevention and suppression land classification the Project Site is located within. The viewer showed that the Project Site is located entirely within a Federal Responsibility Area. These are lands in the state where the federal government has the legal responsibility for providing fire protection; however, the County of Imperial has agreed to provide fire, medical, and other emergency services within the entire portion of the Fort Yuma Indian Reservation lying within Imperial County. The Project Site is not located within or adjacent to a State Responsibility Area (SRA).

The bridge is currently in poor condition and has safety concerns from age and outdated design standards. The bridge and roadway construction will adhere to industry accepted and standard construction designs and guidelines; it will comply with federal and state regulations for construction fire safety; and it will provide adequate emergency access. During construction, Picacho Road between Winterhaven Drive and Jackson Road will be closed to traffic and a detour route made available. The lane closures would be considered less than significant because they would be temporary and detour travel times and lengths will be minimal during construction. In addition, access to the parcels adjacent to the bridge will be maintained throughout construction with rerouting. Once completed, the new updated bridge and roadway would improve access for emergencies and evacuations for adjacent properties and the surrounding communities. The proposed Project would not reduce the number of traffic lanes or create physical barriers along Picacho Road that would impede access to or from the Project Site. Less than significant impacts are expected.

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

b) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The proposed Project is a bridge replacement project, which would not contain project occupants. The Project Site is located in a rural area of Imperial County that contains thousands of acres of flat farmland. Fort Yuma Quechan Tribe Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge over the Yuma Canal and the community of Winterhaven is located approximately 0.55 miles west of the bridge. The nearest residence is approximately 0.12 miles southeast of the bridge. The proposed Project is not anticipated to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, no impacts are expected.

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

c) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The proposed Project is a bridge replacement project that would not pose a risk of fire hazards or exacerbate the risk of fire. No roads, fuel breaks, emergency water sources, power lines, or other utilities will be installed, and the project would comply with federal and state regulations for construction fire safety. Therefore, no impacts are expected.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

d) As described in response to threshold (a), the Project Site is not located within or adjacent to an SRA or lands classified as very high FHSZ. The Project Site is located in a flat area with no high or steep natural slopes. The Project Site is not located with a downstream area or an area with landslides. Fort Yuma Quechan Tribe Tribal Administration buildings are located approximately 0.4 miles southeast of the bridge over the Yuma Canal and the community of Winterhaven is located approximately 0.55 miles west of the bridge. The nearest residence is approximately 0.12 miles southeast of the bridge.

The bridge is currently in poor condition and has safety concerns from age and outdated design standards. The bridge and roadway construction will adhere to industry accepted and standard construction designs and guidelines and it will comply with federal and state regulations for construction fire safety. Once completed, the new updated raised bridge and roadway would help to reduce flood risks. For these reasons described here within, the proposed Project is not anticipated to expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts are expected.

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

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

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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SECTION 3

III. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Planner I
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

NV5

- Amanda Beck.....Biologist
- Eric Fuss.....Biologist
- Marie Barret.....Biologist
- Courtney Armusewicz, MCP.....Transportation Planner
- Laura Murphy.....Civil Engineer
- Lauren Burokas.....Environmental Planner
- Scott Molloy.....Land Development Manager
- Rebecca Davey.....Environmental Specialist
- Karry Blake.....Environmental Scientist
- Cecile Felsher.....Senior Consultant
- Kiran Pallachulla.....Senior Water Resources Engineer

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

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VI. MITIGATED NEGATIVE DECLARATION – County of Imperial

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

Project Name: Imperial County Project No. 6811, Picacho Road Bridge Replacement Project at Yuma Main Canal, Initial Study (IS) # 24-0037.

Project Applicant: Imperial County Public Works Department

Project Location: The Picacho Road Bridge over the Yuma Main Canal is located along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates 32.7358 N, 114.6241 W. The existing bridge is approximately 95 feet in length and 29 feet wide and is used as a pathway leading into the Townsite of Winterhaven in Imperial County. The Project Site is approximately 0.3 miles ~~south-north~~ of Interstate 8 (I-8), 0.6-75 miles ~~east-north~~ of First Street, and approximately 6 miles ~~southeast-northeast~~ of Mexico. Specifically, the Project Site is located between Winterhaven Drive and Quechan Road and runs adjacent to the Union Pacific Railroad tracks. The immediate surrounding area consists of agricultural land. Surrounding areas also include industrial, commercial, warehouse, and residential lands. The nearest residential community is located approximately 0.2 miles to the south of the Project Site. The Project Site is located directly to the west of the Quechan Tribal Administration buildings which is intended to benefit from the bridge reconstruction. The Project Site is located within the Quechan Tribal territory and spans the Yuma Canal system owned by the Bureau of Reclamation (BOR). The canal is operated and maintained by the Yuma County Water Users' Association (YCWUA).

Description of Project: The proposed Project is located at Picacho Bridge over Yuma Main Canal (Picacho Road, Winterhaven, CA 32.7358 N, 114.6241 W and within APN 056-600-011) and is intended to replace the existing bridge leading into the Townsite of Winterhaven in Supervisorial District 1. The proposed Project presents a unique opportunity to construct a modern bridge that implements Best Management Practices (BMPs) concurrently with transportation amenities. Due to cracking and outliving its useful life, the existing wood bridge must be replaced to support commerce, access to the Quechan Reservation and the Bard community, and provide a safer crossing of the Yuma Main Canal. The bridge is owned by Imperial County and its National Bridge Inventory (NBI) number is 58C0028. The bridge crosses the Yuma Main Canal, which is a Bureau of Reclamation facility that is operated and maintained by their managing partner the Yuma County Water Users' Association.

Due to its deteriorating condition, it is proposed to replace the existing bridge with a new Precast Prestressed Concrete Girder Bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The roadway profile is proposed to be raised to approximately 5 feet-4 inches higher than the existing condition, achieving a minimum of 2 feet of vertical clearance over the existing canal bank elevation per the BOR's *Engineering and O&M Guidelines for Crossings*.

The replacement bridge will have a total width of 48'-11". This includes two vehicle lanes of 12', two 8' wide shoulders, and a 6'-0" wide sidewalk on the north side of the bridge. A typical section is also shown below (Exhibit C, Bridge Design). The Yuma Main Canal is a man-made unlined irrigation main canal that flows in a southerly direction under the existing bridge

VII. FINDINGS

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

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

☐ The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A **MITIGATED NEGATIVE DECLARATION** will be prepared.

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

NOTICE

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

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

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

Applicant Signature

Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURE	RESPONSIBLE PARTY	REGULATORY AGENCY	MITIGATION TIMEFRAME
SECTION II. AGRICULTURE AND FOREST RESOURCES			
MM AG-1: Create an on-site buffer zone surrounding the Project Site to ensure no indirect impacts would occur to surrounding agricultural lands. It is recommended the County will need to obtain a signed statement from adjacent property owners stating that no indirect impacts will occur to their property.	Imperial County	Imperial County	Prior to the Start of Construction
SECTION IV. BIOLOGICAL RESOURCES			
MM BIO-1: Nesting surveys by qualified biologists during nesting season (February through August); preferably time construction during non-nesting season (September through January). Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities. <u>Pre-Construction Bird Surveys:</u> If construction or other Project activities are scheduled to occur during the bird breeding season (February 1st through August 31st for raptors and March 15th through August 31st for the majority of migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified avian biologist. The pre-construction survey shall be completed no more than 7 days prior to initial ground disturbance activities and shall include all suitable habitat, including trees, shrubs, burrows, cavities, and structures, within the Project Site and the Project buffer area (100 feet from the edge of grading). To avoid direct impacts to avian species, removal of habitat that could support nests shall occur during the non-breeding season (September 1st through January 31st). Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nesting locations and nesting behavior (including but not limited to copulation, carrying food or nesting materials, nest building, agitation, aggressive interaction, feigning injury, or distraction displays), and non-nesting behavior (including but not limited to foraging or habitat defense). The results of the pre-construction survey shall be submitted to CDFW for review and approval prior to initiating any construction activities. If nesting birds or active nests are detected, the avian biologist shall establish an appropriately sized no-work buffer zone around the nest, which will be based upon the biologist's best professional judgment, the bird's displayed behavior (agitation or stress), the nesting species, its sensitivity to disturbance, nesting stage and expected types, and the intensity and duration of disturbance. The no-work buffer zone shall be clearly marked but should not alert predators. Construction activities shall not occur within any no-work buffer zone until the young birds have successfully fledged and the nest is deemed inactive by the qualified avian biologist.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	February through August (Breeding Season), Prior to the Start of Construction

IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MM BIO-2: Worker Environmental Awareness Program (WEAP) [training for nesting birds, Gila-Woodpecker and Burrowing Owl (BUOW)]: • Biology and status; • Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas; • Reporting procedures to be used if a species is encountered in the field; and driving procedures and techniques, for commuting, and driving on, to the Project Site; • Identification of nesting birds and procedures to follow if nesting is suspected. Prior to the start of construction activities, including any vegetation clearing activities, a qualified biologist shall implement a Worker Environmental Awareness Program (WEAP) for all persons employed or otherwise working on the Project Site. The WEAP shall consist of a presentation that includes a discussion of the biological resources, including the habitats and species that may be present on the Project Site, or within a 150-meter (500-foot) buffer area, including but not limited to western burrowing owl (<i>Athene cucularia hypugaea</i>), Gila woodpecker (<i>Melanerpes uropygialis</i>), California leaf-nosed bat (<i>Macrotus californicus</i>), Pallid bat (<i>Antrozous pallidus</i>), and Townsend's big-eared bat (<i>Corynorhinus townsendii</i>). The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present within the Project Site or within a 150-meter (500-foot) buffer area, legal protections for those species, penalties for violations, and avoidance, minimization, and mitigation measures. The WEAP shall include: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the Project area; (2) training to identify invasive plant species and methods to avoid the spread of invasive plants on and around the Project Site; (3) information on special-status species that have the potential to occur on the Project Site or within a 150-meter (500-foot) buffer area; (4) reporting procedures to be used if any special-status species are encountered within the Project Site or within a 150-meter (500-foot) buffer area; Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work within the Project Site or within a 150-meter (500-foot) buffer area.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Prior to the Start of Construction
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IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MM BIO-3 Western Burrowing Owl Surveys and Avoidance: • <u>Focused Burrowing Owl Survey</u> To avoid construction-level impacts to unidentified burrowing owls within the Project Site, a qualified biologist shall conduct a focused burrowing owl survey in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). The survey shall cover the Project Site and a 150-meter (500-foot) buffer area, where suitable habitat exists and where legally accessible. If the survey results are positive (i.e., active burrows are found), the County shall coordinate with CDFW in the preparation of a Burrowing Owl Protection and Mitigation Plan. (described below) to allow commencement of disturbance activities within the Project Site. A pre-construction survey shall be conducted within 14 days prior to the start of construction activities (see below). • <u>Pre-Construction Survey and Avoidance Measures</u> Depending on the Project activity type and associated disturbance, a minimum avoidance buffer distance of 50 meters (165 feet) to 100 meters (330 feet) during the non-breeding season (September 1st through January 31st) and 100 meters (330 feet) to 150 meters (500 feet) during the breeding season (February 1st through August 31st) shall be maintained between active burrows and construction activities. A qualified biologist shall monitor the burrowing owls for any sign of distress and adjust the buffers as necessary to ensure no take occurs. Pre-construction take avoidance surveys for this species shall be conducted within 14 days prior to the start of ground disturbing activities, including vegetation clearing) and 24 hours prior to construction to determine the presence or absence of this species within the Project Site. A report shall be submitted by a qualified biologist to CDFW. The Project Site shall be clearly demarcated in the field prior to the commencement of the pre-construction take avoidance surveys. The surveys shall follow the guidance of the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). • <u>Impacts to Active burrows, Permitting and Mitigation Requirements</u> If active burrows are present within the Project Site and complete avoidance is infeasible, construction activities, including but not limited to vegetation clearing, shall be postponed until the appropriate authorization (i.e. CESA incidental take permit under the California Fish and Game Code § 2081) is obtained. Should permanent loss of western burrowing owl habitat occur, preservation of suitable burrowing owl habitat at a minimum ratio of one to one (1:1) shall be acquired and permanently preserved for each acre of suitable habitat lost. The ratio shall be higher for occupied and irreplaceable habitats. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Permanent protection of mitigation land shall be established through a conservation easement deemed to a nonprofit conservation organization or public agency with a conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Within 14 Days Prior to the Start of Construction
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IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

<u>MM BIO-4 Pre-Construction Plant Survey:</u> Prior to the start of construction, a qualified biologist shall conduct a botanical field survey following the methodology described in Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW, March 2018). The survey shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of areas proposed for disturbance and indirectly impacted by the Project. The results of the survey shall be documented in a letter report that will be submitted to ICPDS and CDFW. If special-status plant species are observed during the pre-construction rare plant survey within the Project Site or Project buffer area (100 feet from the edge of grading), the Project shall reduce impacts to these species through the establishment of buffers, to the extent feasible. Buffer distances shall be determined by the Project biologist and Project engineer, typically 50 feet or greater from an identified special-status plant species, unless the qualified biologist determines a reduced buffer would suffice to avoid impacts to the species. If avoidance of special-status plant species is not feasible, a Special-Status Plant Relocation Plan shall be developed and implemented. The Special-Status Plant Relocation Plan shall address mitigation for special-status plants, including but not limited to: topsoil salvage to preserve seed bank and management of salvaged topsoil; seed collection, storage, possible nursery propagation, and planting; salvage and planting of bulbs as feasible; location of on-site receptor sites; and land protection instruments for receptor areas. The Special-Status Plant Relocation Plan shall include methods, monitoring, reporting, success criteria, adaptive management, and contingencies for achieving success. The plan shall be prepared for CDFW's review, approval, and implementation prior to the commencement of construction activities, including any habitat clearing activities. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map and included on the construction plans.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Prior to the Start of Construction
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IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

BIO-5 Pre-Construction Focused Bat Survey: All suitable roosting and foraging habitat for local or migratory bat species, including special-status species, shall be surveyed within the Project Site or Project buffer area (100 feet from the edge of grading) within 14 days prior to the start of construction, including any habitat clearing activities. The survey shall be completed by a qualified bat biologist. The Survey shall include determination of the approximate size of the colony(s) and species present. The survey shall include a combination of nighttime emergence counts and acoustic techniques (full spectrum bat acoustic detectors) appropriate for the roosting habitat and time of year, visual and aural surveys (observation during foraging period), and inspection for suitable habitat and bat sign (e.g. guano). If roosting bats, of any status, are found during the survey, the bats and roosts shall be avoided to the maximum extent practicable with consideration of the most disturbing Project activities and their effect (e.g. demolition and night-time lighting). A Bat Management Plan prepared by the qualified bat biologist identifying situation-specific and species-specific avoidance and minimization measures to reduce impacts to roosting and foraging bats shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. The Bat Management Plan shall include, as appropriate to the findings of the surveys and roosting habitat affected, a construction schedule to avoid roosting season, spatial and temporal avoidance measures, non-disturbance buffers, passive exclusion of bats outside of the maternity season (if necessary), and identification of species-specific replacement or alternative habitat to mitigate for permanent maternity or night roosting habitat loss. If roosts cannot be avoided or it is determined that construction activities will cause roost abandonment, a mitigation plan addressing exclusion and passive relocation procedures and impact compensation will be developed. The mitigation plan will be developed in consultation with CDFW and the qualified bat biologist. Roost and foraging habitat shall be replaced in-kind prior to any exclusion or in a timing approved by CDFW. Any exclusion and passive relocation efforts shall avoid periods of sensitive activity (e.g. hibernation or maternity season) and may require several seasons for bats to discover alternative roosting sites.	Imperial County, Project Biologist	Imperial County, California Department of Fish & Wildlife (CDFW), US Fish & Wildlife Service (USFWS)	Within 14 Days Prior to the Start of Construction
SECTION V. CULTURAL RESOURCES			
MM CUL-1: In all phases of construction work an Inadvertent Discovery Plan should be developed and shared with staff on-site. If archaeological or cultural resources are encountered during project work, all work in the immediate vicinity of the find will be suspended until assessed by the qualified archaeologist and a treatment is determined.	Imperial County, Project Archaeologist	Imperial County, NAHC, and Quenchan Tribe	Prior to the Start of Construction, and Throughout Construction Process
MM CUL-2: Should human remains be encountered during ground disturbing activities; all work will cease, and the County Medical Examiner will be contacted.	Imperial County, County Medical Examiner, Project Archaeologist		Throughout Construction Process
SECTION VII. GEOLOGY AND SOILS			
MM GEO-1: Prior to earthmoving activities, a certified geotechnical engineer or equivalent, shall perform a final geotechnical evaluation of the soils. The evaluation will follow the requirements of California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2. related to expansive soils and soil conditions. The structural design, tests and inspections, and soils and foundation standards will be in accordance with requirements from California Building Code Title 24, Part 2, Chapter 16, 17, and 18. The final geotechnical evaluation shall include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures, including threats from liquefaction, subsidence, lateral spreading, or collapse. The grading and improvement plan for each phase of the project shall be designed in accordance with the recommendations provided in the final geotechnical evaluation.	Imperial County, Project Geotechnical Engineer or Equivalent	Imperial County	Prior to the Start of Construction

IMPERIAL COUNTY PROJECT NO. 6811
PICACHO ROAD BRIDGE REPLACEMENT PROJECT AT YUMA MAIN CANAL INITIAL STUDY (IS) # 24-0037
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURE	RESPONSIBLE PARTY	REGULATORY AGENCY	MITIGATION TIMEFRAME
SECTION IX. HAZARDS AND HAZARDOUS MATERIALS			
MM HAZ-1: If in-situ potentially hazardous materials are encountered, all construction in the vicinity of the encounter will be halted. All construction contractors shall immediately stop all surface or subsurface activities in the event that potentially hazardous materials are encountered, an odor is identified, or considerably stained soil is visible. Contractors shall follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. These requirements shall be included in the contractor's specifications. If any hazardous materials, waste sites, or vapor intrusion risks are identified prior to or during construction, a qualified professional, in consultation with appropriate regulatory agencies, will develop and implement a plan to remediate the contamination and properly dispose of the contaminated material. If material imports are proposed, the contractor shall furnish the County of Imperial or its representative with appropriate documentation certifying that the imported materials are free of contamination.	Imperial County	Imperial County	Throughout Construction Process
MM HAZ-2: Implementing agencies shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to subsoils and groundwater. A BMP Maintenance Plan shall be prepared by Implementing Agencies upon approval of the BMP projects that identify the frequency and procedures for removal and/or replacement of accumulated debris, surface soils, and/or media (to a depth where constituent concentrations do not represent a hazardous condition and/or have the potential to migrate further and impact groundwater) to avoid the accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsoils and groundwater. Structural BMPs shall be designed to prevent the migration of constituents that may impact groundwater.	Imperial County	Imperial County	Prior to the Start of Construction, and Throughout Construction Process
SECTION XIX. UTILITIES AND SERVICE SYSTEMS			
MM UTIL-1: Implementing agencies shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill where feasible. Implementing agencies shall incentivize construction contractors with waste minimization goals in bid specifications where feasible. Upon completion, the proposed Project will not add to solid waste demand or generate excessive solid waste. The proposed Project will comply with federal, state, and local regulations related to solid waste. Impacts would be less than significant with mitigation measures.	Imperial County	Imperial County	Throughout Construction Process

ATTACHMENT “G”
RESPONSE TO COMMENT LETTERS



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March 6, 2025

RECEIVED

By Imperial County Planning & Development Services at 8:18 am, Mar 06, 2025

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: NOI for the Preparation of an MND for the Picacho Road Bridge at Yuma Main Canal Replacement Project; IS #24-0037

Dear Mr. Bejarano:

A3-1

On March 5, 2025, the Imperial Irrigation District received from the Imperial County Planning and Development Services Department, the Notice of Intent for the preparation of a mitigated negative declaration for the Picacho Road Bridge at Yuma Main Canal replacement project; Initial Study No. 24-0037. The Imperial County Public Works Dept. proposes to replace the existing bridge at Picacho Road over the Yuma Main Canal, leading into the townsite of Winterhaven, California; with a new precast prestressed concrete girder bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The project includes the demolition, removal and disposal of the existing bridge.

A3-2

The IID has reviewed the IS/MND and found that the comments provided in the October 21, 2024 district letter (see attached) continue to apply.

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

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Joanna Smith-Hoff – Deputy General Counsel
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



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October 21, 2024

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Picacho Road Bridge at Yuma Main Canal Replacement Project; IS #24-0037

Dear Mr. Bejarano:

A3-3

On October 16, 2024, the Imperial Irrigation District received from the Imperial County Planning and Development Services Department, a request for agency comments on the Picacho Road Bridge at Yuma Main Canal replacement project; Initial Study No. 23-0037. The Imperial County Public Works Dept. proposes to replace the existing bridge at Picacho Road over the Yuma Main Canal, leading into the townsite of Winterhaven, California; with a new precast prestressed concrete girder bridge that spans over the canal with no intermediate supports, to minimize disturbance to canal operations during construction and to keep debris out of the canal as much as possible. The project includes the demolition, removal and disposal of the existing bridge.

The IID has reviewed the application and has the following comments:

A3-4

1. The project will be impacting an existing overhead distribution line (A-66 Circuit 7.2/12.5kV) in the immediate project area. Please note the line currently is serving various customers in the area. An IID Encroachment Permit (see Comment No. 7) will be required for the project with all approved pertinent plans, profiles, construction plans with existing and proposed construction easements for IID to review and approve.

A3-5

2. For any modification to the existing overhead distribution lines, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com. to initiate the customer service application process. In addition to submitting a formal application (available at <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance

- | | |
|-----------------|--|
| A3-5
Cont... | documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project. |
| A3-6 | 3. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant. |
| A3-7 | 4. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities. |
| A3-8 | 5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties. |
| A3-9 | 6. The applicant will be required to bear all costs associated with acquisition of land, rights of way, easements, and the relocation and/or realignment of IID infrastructure deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost. |
| A3-10 | 7. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure. |
| A3-11 | 8. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the IID website https://www.iid.com/about-iid/departments-directory/real-estate . No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. |
| A3-12 | 9. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical |

A3-12
Cont...

transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

A3-13

10. When a project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, and determine if the project would require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

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

Respectfully,



Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Michael P. Kemp – Superintendent General, Fleet & Compliance Services
Laura Cervantes, – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

A3

Imperial Irrigation District March 5, 2025, Comment Letter

On the Picacho Road Bridge at Yuma Main Canal Replacement Project

Mitigated Negative Declaration (IS #24-0037)

- A3-1** The comment states that the Imperial Irrigation District received the Notice of Intent for the Project's Mitigated Negative Declaration and provides a brief description of the proposed Project. The comment is an introductory paragraph for more specific comments to follow. This comment and the County's response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.
- A3-2** The comment references a prior comment letter that IID submitted on October 21, 2024, submitted to the County which is attached. The comment states that the prior comment letter continues to apply. The County's responses to the October 21st comment letter are provided below.

Imperial Irrigation District October 21, 2024, Comment Letter

- A3-3** The comment states that the IID received a request from the County for agency comments on the Project. The comment is an introductory paragraph for more specific comments to follow. This comment and the County's response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.
- A3-4** The comment states the Project will be impacting an existing overhead distribution line (A-66 Circuit 7.2/12.5kV) in the immediate Project area. The comment states that the line is currently serving various customers in the area and that an IID Encroachment Permit will be required for the Project by IID and that IID will require review and approval of all approved pertinent plans, profiles, construction plans, and easements. The County acknowledges that the Project will have a minor impact on the horizontal and vertical alignments of the distribution line (Circuit A-66) crossing over and running along the north side of Picacho Road, however, no additional IID easement or ROW area should be required to accommodate these changes. These adjustments to Circuit A-66 can be accommodated within the existing easement area for this distribution line. The County has prepared construction plans for the Project and will apply for an encroachment permit from IID to address impacts to the alignment of this distribution line. Additionally, the project does not require any temporary or permanent electric power connections to or extensions of IID's electric distribution system and the Project does not require any new or expanded IID electrical infrastructure or service. Therefore, no circuit study and no new easements or ROW should be required for the Project. The Project's MND analyzes the Project's potential impacts to IID facilities in Section XIX of the MND, Utilities and Service Systems. The analysis has been updated to clarify the required adjustments to Circuit A-66 addressed in this response.

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

- A3-5** The comment states that for any modification to the existing overhead distribution lines, the applicant (County) should contact Joel Lopez, IID project development planner, to initiate the customer service application process. The comment also references the required submittal requirements for this application and states that the County will be responsible for all costs and mitigation measures related to providing electrical service. The County acknowledges IID's application process, submittal requirements, and applicable costs and potential mitigation requirements. The County will work with IID to satisfy these requirements.
- A3-6** The comment states electrical capacity is limited in the Project area and that a circuit study may be required. Please see the Response to Comment A3-4 above. The Project does not require any new or expanded IID electrical infrastructure or service.
- A3-7** The comment states that the County shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights-of-way deemed by IID as necessary to accommodate the Project's electrical infrastructure. Please see the Response to Comment A3-4 above. The County will provide an exhibit to IID with the submittal of the Encroachment Permit application showing the boundaries of rights-of-way, easements, and legal ownership for the Project area.
- A3-8** The comment states the County will be required to provide rights-of-way and easements for any proposed power line extensions and/or any other infrastructure needed to serve the Project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties. The County acknowledges these requirements and refers the reader to the Response to Comment A3-4 above.
- A3-9** The comment states the County will be required to bear all costs associated with acquisition of land, rights-of-way, easements, and the relocation and/or realignment of IID infrastructure deemed necessary to accommodate the Project. The County acknowledges these requirements and refers the reader to the Response to Comment A3-4 above.
- A3-10** The comment states public utility easements shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure. The County acknowledges this requirement and refers the reader to the Response to Comment A3-4 above.
- A3-11** The comment states that any construction or operation on IID property or within its existing and proposed rights-of-way or easements will require an encroachment permit or encroachment agreement, references IID's permit application and instructions, and states that no foundations or buildings will be allowed within IID's rights-of-way. The County acknowledges the comment and refers the reader to the Response to Comment A3-4 above.
- A3-12** The comment states any new, relocated, modified, or reconstructed IID facilities required for or by the Project need to be included as part of the Project's CEQA and/or NEPA documentation, environmental impact analysis, and mitigation. The County acknowledges the comment and refers the reader to Response to Comment A3-4 above.
- A3-13** The comment states that when a project goes through the CEQA compliance process, to address a project's impacts to the electrical utility, including the relocation or construction

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

of new or expanded facilities, a circuit study/distribution impact study, facility study, and/or system impact study must be performed. The County acknowledges the comment and refers the reader to the Response to Comment A3-4 above.



April 9, 2025

Luis Bejarano
Planner I
Imperial County Planning and Development Services Department
801 Main Street
El Centro, CA, 92243

Dear Mr. Bejarano:

PICACHO ROAD BRIDGE REPLACEMENT PROJECT (PROJECT)
MITIGATED NEGATIVE DECLARATION (MND)
SCH# 2025030216

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from Imperial County Planning and Development Services Department (ICPDS) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

A1-1

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.

A1-2

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may

¹ 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.

A1-2
Cont...

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

A1-3

Proponent: Imperial County Public Works Department

Objective: The objective of the Project is to replace the existing Picacho Bridge, which has outlived its useful life, with a modern bridge. Primary Project activities include removal of portions of the existing bridge, placement of a concrete girder bridge, land clearing, tree and vegetation removal, grading and excavation, drainage, utilities and sub-grade, and paving.

Location: The project is located on the Picacho Road Bridge over the Yuma Main Canal, along Picacho Road in Winterhaven, CA. The bridge lies within APN 056-600-011 with coordinates latitude 32.7358, longitude -114.6241. The project site is north of Interstate 8 and 0.6 miles east of First Street.

Timeframe: Project construction is estimated to be over eight months.

COMMENTS AND RECOMMENDATIONS

A1-4

CDFW is concerned there is a lack of appropriate biological resource surveys and supporting documentation provided in the MND, and therefore it is unclear how the proposed mitigation measures will be able to reduce the Project's potentially substantial adverse effect on biological resources to less than significant with mitigation incorporated. The mitigation measures currently proposed in the MND require surveys to be conducted to be able to identify and quantify the biological resources that will be impacted by the Project. Without the environmental baseline adequately evaluated, impacts to biological resources are not identified and appropriate mitigation measures cannot be formed. CDFW notes that baseline surveys should have already been conducted and included in the environmental document, and appropriate mitigation for on-site resources should have been included in the MND, as deferment does not allow the development of effective mitigation measures.

CDFW offers the comments and recommendations below, including those in Attachment A, to assist ICPDS in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Environmental Setting and Related Impact Shortcoming

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

COMMENT 1:

Section: IV Biological Resources, Page 25

Issue: The MND has not accurately described or fully established the biological resources present on-site, limiting the CEQA Lead Agency's and CDFW's ability to analyze the Project's potential impacts, and evaluate the effectiveness of the proposed avoidance, minimization, and/or mitigation measures on candidate, sensitive, or special status species. In addition, the MND states impacts to these species will be less than significant with mitigation incorporated. The MND does not identify the significant impacts that required mitigation measures to be proposed.

A1-5

Specific impact: There is a discrepancy in the number of general reconnaissance biological surveys conducted – the Summary of the Natural Environment Study in Appendix B states that two surveys were conducted, but Section 2.2.1 (Survey Methodologies) lists three survey dates. Neither the MND nor the Natural Environment Study in Appendix B describe the survey methods and no species-focused surveys were conducted. Without conducting surveys that follow CDFW guidance and protocol, potential Project impacts to candidate, sensitive, or special status species may be mischaracterized, resulting in avoidable, unminimized, or unmitigated impacts not identified or analyzed by the MND. If levels of significance cannot be accurately established, neither the CEQA Lead Agency nor CDFW can adequately determine if the proposed mitigation measures truly reduced impacts to a less than significant level.

Furthermore, the CEQA checklist in the MND show that several areas under Biological Resources are checked as Less Than Significant with Mitigation Incorporated, and Appendix B states, "No impacts are expected with avoidance and minimization efforts." If Project impacts are significant to levels that require mitigation, then those significant impacts should be identified in the MND, and the proposed mitigation measures should describe how impact significance will be reduced.

Why impact would occur: The MND and accompanying Natural Environment Study do not have sufficient information on whether the Project site includes suitable habitat for or if the Project has potential impacts to the 10 botanical species and 37 zoological species listed in the Natural Environment Study, or other present biological resources.

A1-5
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Evidence impact would be significant: Per CEQA Appendix G (Evaluation of Environmental Impacts), which is reiterated on page 18 of the MND, the explanation of each issue should identify the significance criteria or threshold used to evaluate each question and the mitigation measure identified to reduce the impact to less than significance.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

To reduce impacts to less than significant: CDFW recommends that ICPDS conduct species-focused surveys per CDFW's guidance and protocols (<https://wildlife.ca.gov/Conservation/Survey-Protocols>) and incorporate the results and CDFW's additional comments, as detailed below, into the MND.

COMMENT 2:

Section IV Biological Resources, Page 25

Issue: No plant surveys were conducted following CDFW's survey protocol for special-status native plant populations and natural communities. The general reconnaissance biological surveys were conducted outside of several special-status plants' bloom periods. Also, neither the MND nor Natural Environment Study in Appendix B include measures to avoid, minimize, or mitigate impacts to any special-status plant species, should they be found on the Project site during construction.

Specific impact: The general reconnaissance biological surveys conducted on November 5, 2022, August 8, 2024, and August 9, 2024, are outside the bloom period for six of the ten special status-species listed in the Natural Environment Study. Per the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018), botanical field survey visits should be spaced throughout the growing season and multiple visits to the project area are usually required to capture the floristic diversity at a level necessary to determine the presence of special-status plant species.

Why impact would occur: The three general reconnaissance biological surveys do not follow the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018), and thus may not provide adequate baseline conditions to identify and evaluate impacts to special-status species. If any special-status plant species are found on the project site during construction, no avoidance, minimization, or mitigation measures are provided in the MND to ensure that impacts are reduced to less than significant levels.

The *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018) state that botanical field

A1-6

surveys in the field should be conducted at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting. Six of the ten special-status species, some of which are annual species, listed in the Natural Environment Study have bloom periods outside of the November and August months: Giant Spanish needle (*Palafoxia arida* var. *gigantea*) has a bloom period of February to May; Saguaro (*Carnegiea gigantea*) has a bloom period of May to June; Wiggin's croton (*Croton wigginsii*) has a bloom period of March to May; Harwood's milk vetch (*Astragalus insularis* var. *harwoodii*) has a bloom period of January to May; Narrow leaf sandpaper plant (*Petalonyx linearis*) has a bloom period of March to May; and Desert beardtongue (*Penstemon pseudospectabilis* ssp. *Pseudospectabilis*) has a bloom period of January to May (Calflora, 2025).

A1-6
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Evidence impact would be significant: Sensitive plant species are listed under CESA as threatened, or endangered, or proposed candidates for listing; designated as rare under the Native Plant Protection Act; or plants that otherwise meet the definition of rare, threatened, or endangered species under CEQA. Plants constituting California Rare Plant Ranks 1A, 1B, 2A, and 2B generally meet the criteria of a CESA-listed species and should be considered as endangered, rare, or threatened species for the purposes of CEQA analysis. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Fish and Game Code Sections 1900–1913 includes provisions that prohibit the take of endangered and rare plants from the wild and a salvage requirement for landowners.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure (MM) BIO-4:

To reduce impacts to less than significant: CDFW recommends botanical field surveys following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018) be conducted annually prior to the start of construction by qualified personnel. One botanical field survey may not be sufficient to detect plants that are not evident and identifiable every year. CDFW recommends MM BIO-4 Pre-Construction Plant Surveys, listed in Attachment A, to be incorporated into the MND.

COMMENT 3:

Section IV Biological Resources, Page 25

A1-7

Issue: CDFW is concerned regarding the MND's analysis of impacts to western burrowing owl (*Athene cunicularia hypugaea*). Both the MND and Natural Environment Study state that western burrowing owl was not observed during the survey(s) on the project site, but no details are provided on how the survey(s) was

conducted. As of October 25, 2024, the western burrowing owl is a candidate species for listing under CESA.

Specific impact: Focused western burrowing owl surveys were not conducted following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012). In addition, the MND and Natural Environment Study are not clear on if western burrowing owl was found outside of the biological study area but within the proposed environmentally sensitive area or if only potentially suitable habitat was present. While the Project site and surrounding areas are heavily traveled, western burrowing owls have high site fidelity and a high potential to move into disturbed sites prior to and during construction activities. Western burrowing owls frequently move into disturbed areas since they are adapted to highly modified habitats (Chipman et al., 2008; Coulombe, 1971).

A1-7
Cont...

Why impact would occur: Without focused surveys conducted following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, March 2012), adequate baseline conditions cannot be established, and associated impacts cannot be identified or analyzed. The MND does not propose avoidance, minimization, or mitigation measures if burrowing owls are found on the project site during construction, nor does the MND propose obtaining a CESA incidental take permit (ITP) if take of the species were to occur.

Evidence impact would be significant: As a candidate species for listing, western burrowing owl is granted the same protection as threatened or endangered species under CESA. Take of any CESA-listed species is prohibited except as authorized by State law (Fish and Game Code § 2080 and § 2085). Consequently, if a Project, including Project construction or any Project-related activity during the life of the Project, results in the take of CESA-listed species, CDFW recommends that the Project proponent seek appropriate authorization prior to Project implementation. This may include an ITP (Fish and Game Code § 2081).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure BIO-3:

To reduce impacts to less than significant: CDFW recommends focused burrowing owl surveys following the guidance in the *Staff Report on Burrowing Owl Mitigation* (CDFG, March 2012). If active burrows are present within the Project footprint during pre-construction take avoidance surveys and complete avoidance is infeasible, the Project proponent shall not undertake Project activities and Project activities shall be postponed until the appropriate authorization (i.e. CESA ITP under the California Fish and Game Code § 2081) is obtained. CDFW recommends MM BIO-3 Western Burrowing Owl Avoidance and Mitigation, listed in Attachment A, to be incorporated into the MND.

COMMENT 4:

Appendix B, Section 4.3.1, Page 15

Issue: The Natural Environment Study in Appendix B states that no bats were observed under the bridge, but the general reconnaissance biological surveys were conducted during daylight hours and bat-focused surveys were not conducted.

Specific impact: Removal of existing roosting structures, construction disturbance including noise, light and vibration, and loss of foraging habitat may impede continued use of any potential existing roosting sites under the bridge. While bats may not be day roosting under the bridge, the underside of the bridge or surrounding vegetation may be used for night roosting.

Why impact would occur: The MND does not include focused bat surveys during appropriate time of day and thus does not include an adequate baseline evaluation from which to determine impacts or mitigation measures. California leaf-nosed bats (*Macrotus californicus*) emerge late in the day, usually one to two hours after sunset in the summer, and at sunset in winter; they have a second activity peak around 10 p.m. (Zeiner, 1990). Pallid bats (*Antrozous pallidus*) also emerge late in the day, starting approximately 30-60 minutes after sunset, with peak activities at approximately 90-190 minutes after sunset and shortly before dawn (Zeiner, 1990). Peak activity for Townsend's big-eared bats (*Corynorhinus townsendii*) is late evening (Zeiner, 2000).

Evidence impact would be significant: Bat species are protected by the California Fish and Game Code § 4150 (§ 4150 prohibits the take of naturally occurring nongame mammals, including bats). Bat maternity roosting habitats are protected as native wildlife nurse sites, and impediment of a site may be considered significant under CEQA.

California leaf-nosed bats are commonly found along the Colorado River and are sensitive to roost disturbance. California leaf-nosed bat may night roost in bridges, as they provide overhead protection (Zeiner, 1990).

Pallid bats are very sensitive to disturbance of roosting sites, which are essential for metabolic economy and juvenile growth. Night roosts serve as locations for prey consumption (Zeiner, 1990).

Roosting sites for Townsend's big-eared bats are the most important limiting resource for the species, and sites have high fidelity if left undisturbed. Townsend's big-eared bats are extremely sensitive to disturbance of roosting sites and a single visit may result in abandonment of the roost (Zeiner, 2000). Loss of night roosts may increase energy expenditure and may result in mortality if energy loss is not compensated for by increased prey intake. If lactating females have increased

A1-8

A1-8
Cont...

energy expenditure, it may result in limited energy allocation towards dependent young and increase juvenile mortality (Chaverri and Kuntz, 2011).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure BIO-5:

To reduce impacts to less than significant: CDFW recommends MM BIO-5 Focused Bat Surveys and Preparation of a Bat Management Plan, listed in Attachment A, to be incorporated into the MND.

COMMENT 5:

Section IV Biological Resources, Page 26

Issue: The MND states that no work is expected to occur within the Yuma Main Canal and no impacts to the water will occur. However, the MND does not consider the potential for debris during bridge removal or other construction material to fall within the water of the canal. Additionally, the Project Summary on Page 14 states a 50-ton crane will remove portions of the original bridge's pylons, then states no alteration of streambed will occur.

Specific impact: The MND is unclear on how the removal and replacement of the bridge will be performed in a method that avoids impacts to the canal, and the typical section provided in the MND is not legible. Project construction activities include removal of pylons, which are within the flow of the canal.

Why impact would occur: The MND does not analyze impacts to the Yuma Main Canal if debris or other materials enter the water nor does the MND consider the possibility of such an event in the Biological Resource section, despite the majority of the Picacho Road Bridge spanning over water. As such, no avoidance, minimization, or mitigation measures were formulated or included in the MND to ensure that impacts are reduced to less than significant levels, nor is the notification requirement per Fish and Game Code section 1602 mentioned. It is also unclear if the existing pylons are embedded in the streambed of the canal.

Evidence impact would be significant: The Project may create impacts to the Yuma Main Canal that may adversely affect existing fish or wildlife resources. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other materials containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

A1-9

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

A1-9
Cont...

To reduce impacts to less than significant: CDFW recommends that ICPDS require the Project proponent to submit a notification per Fish and Game Code section 1602 prior to commencing Project construction activities. CDFW recommends MM BIO-6 Lake and Streambed Alteration (LSA) Agreement, listed in Attachment A, to be incorporated into the MND.

II. Project Description and Related Impact Shortcoming

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

COMMENT 6:

Section IV Biological Resources, Page 26

Issue: The MND does not identify what best management practices (BMPs) are proposed and does not show which areas will be designated as Environmentally Sensitive Areas (ESA).

Specific impact: Neither the MND nor the Natural Environment Study in Appendix B describe what specific BMPs will be imposed to avoid impacts to the water in the Yuma Main Canal. Areas that will be designated as ESAs are not shown in either the MND or Appendix B. In addition, the MND does not explain how areas surrounding the Project are or will be designated as an ESA.

Why impact would occur: Without identifying the BMPs or establishing a set standard, the BMPs effectiveness at avoiding water impacts cannot be determined, measured, or enforced. The proposed ESAs are not provided in the MND for public review, so CDFW cannot determine if those proposed areas will adequately serve and protect sensitive habitat.

Evidence impact would be significant: The Project may create impacts to the Yuma Main Canal that may adversely affect existing fish or wildlife resources. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other materials containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

A1-10

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

A1-10
Cont...

To reduce impacts to less than significant: CDFW recommends listing specific and enforceable BMPs, describing how the proposed BMPs will prevent Project construction activities from contacting the water in the Yuma Main Canal. CDFW also recommends that ICPDS notify CDFW per Fish and Game Code section 1602, in the event that in-water work does occur (See comment 5). Additionally, CDFW recommends providing a map with ESA-designated areas clearly delineated.

III. Mitigation Measure or Alternative and Related Impact Shortcoming

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

COMMENT 7:

Section Appendix B (Natural Environment Study), Page 15; Section IV Biological Resources, Page 26

Issue: The proposed MM BIO-2 in the MND does not address invasive plants, despite the Natural Environment Study in Appendix B including a measure addressing invasive plants under the Avoidance and Minimization Efforts/Compensatory Mitigation section.

A1-11

Specific impact: Since none of the mitigation measures in the MND include methods to prevent the spread of invasive plant species, proper disposal of invasive plant material removed during Project clearing and grubbing activities may not occur, as there is no set standard. Furthermore, the Natural Environment Study in Appendix B states that invasive plants will “be removed in a manner that will not spread seeds or root material,” but does not state the method of removal or how on-site construction personnel will identify which plants are invasive.

Why impact would occur: The Natural Environment Study states that mostly invasive plant species were observed during the general reconnaissance biological surveys and that those species “would be expected to grow back rapidly if disturbed.” The MND states Project activities include clearing existing vegetation, which would disturb the surrounding invasive plants and increase their spread.

Evidence impact would be significant: Invasive species threaten the diversity or abundance of native species through competition for resources, predation, parasitism, interbreeding with native populations, transmitting diseases, or causing physical or chemical changes to the invaded habitat. Through their impacts on natural ecosystems, agricultural and other developed lands, water delivery and flood

protection systems, invasive species may also negatively affect human health and/or the economy. Examples of direct impacts to human activities include clogging navigable waterways and water delivery systems, weakening flood control structures, damaging crops, introducing diseases to animals that are raised or harvested commercially, and diminishing sportfish populations (CDFW, 2025).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

A1-11
Cont...

Mitigation Measure BIO-2:

To reduce impacts to less than significant: CDFW recommends creating a worker environmental awareness program (WEAP) that is specific to the Project. CDFW also suggests creating separate mitigation measures for pre-construction nesting bird surveys (see Comment 8) and WEAP to ensure compliance and enforceability of on-site personnel during Project activities. CDFW provides revisions to MM BIO-2 in Attachment A.

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

COMMENT 8:

Section IV Biological Resources, Page 26

Issue: MM BIO-2 defers avoidance and minimization measures, stating "identification of nesting birds and procedures to follow if nesting is suspected."

Specific impact: MM BIO-2 defers mitigation by only requiring a nesting bird procedure if a nest is found during future surveys. MM BIO-2 also does not consider impacts to birds on the Project site during non-nesting or non-breeding season, nor does it consider the disturbance created by construction activities.

A1-12

Why impact would occur: All mitigation and avoidance and minimization measures incorporated to bring impacts to species to less than significant should be contained within the MND. Mitigation strategies developed at a later date may not be effective to reduce impacts to less than significant levels, as the requirements are not contained within the MND to ensure compliance.

Evidence impact would be significant: Under the CEQA Guidelines § 15126.4, mitigation measures should be implemented to address significant impacts that have been identified through environmental analysis. Formulation of mitigation measures should not be deferred to a future time, unless the Lead Agency has provided a

legitimate reason not to include the mitigation measures at the time of the Project's environmental review, which the Lead Agency has not provided in the MND.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

A1-12
Cont...

Mitigation Measure BIO-1:

To reduce impacts to less than significant: CDFW suggests splitting MM BIO-2 to ensure compliance and enforceability, as stated in Comment 7. Since MM BIO-1, as it is currently written in the MND, proposes nesting bird surveys prior to construction, CDFW provides revisions to MM BIO-1 in Attachment A.

IV. Editorial Comments and/or Suggestions

A1-13

Pages 11 and 14 of the MND state that the Project location is south of Interstate 8 and southeast of Mexico. However, the Picacho Road Bridge is north of Interstate 8 and north of Mexico. CDFW recommends correcting the location description.

Page 24 of the MND states that Project construction will start at the beginning of 2024, which has already passed. CDFW recommends correcting the construction date.

A1-14

The MND is unclear on what type of swallows were observed in the Project vicinity. Page 12 of the MND states that bank swallows (*Riparia riparia*) were observed in the buffer zone, but Table 2 lists barn swallows (*Hirundo rustica*) as found in the vicinity instead. The remainder of the MND and Natural Environment Study in Appendix B only mention bank swallows and not barn swallows. Bank swallows are a CESA-listed threatened species (CDFW, April 2025). CDFW recommends clarifying the type of swallows observed during the general reconnaissance biological surveys.

A1-15

The Sensitive Botanical and Zoological Species (CNDDDB/CNPS) chart in the Natural Environment Study analyzes the potential for presence of Colorado Desert fringe-toed lizard (*Uma notata*). The site potential states "not expected" as "riparian habitat is not present". Riparian habitat is typically not associated with this species, and CDFW recommends re-evaluation of the presence of this species based on habitat types within the Project site and the species habitat requirement of fine wind-blow sand (Thomson et al., 2016).

A1-16

The Sensitive Botanical and Zoological Species (CNDDDB/CNPS) chart in the Natural Environment Study states that no habitat is expected for Gila woodpecker (*Melanerpes uropygialis*), but page 25 of the MND and pages 13 and 15 of the Natural Environment Study states that palm trees are available in the Project vicinity that could allow roosting or nesting. CDFW recommends correcting the MND and Natural Environment Study for consistency on Gila woodpecker.

ENVIRONMENTAL DATA

A1-17

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). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

A1-18

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document 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 environmental document filing 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.)

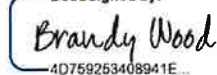
CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist ICPDS in identifying and mitigating Project impacts on biological resources.

A1-19

Questions regarding this letter or further coordination should be directed to Lily Mu, Senior Environmental Scientist (Specialist), at (909) 544-2521 or Lily.Mu@wildlife.ca.gov.

Sincerely,

DocuSigned by:

40759253408941E...

Brandy Wood
Environmental Program Manager

Attachments

Attachment A. Draft Mitigation, Monitoring, and Reporting Program

ec: Office of Planning and Research, State Clearinghouse, Sacramento

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A1-20
Cont...

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Attachment A
Draft Mitigation, Monitoring, and Reporting Program

A1-21

Draft Mitigation, Monitoring, and Reporting Program (MMRP)
 CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
BIO-1 Pre-Construction Bird Surveys: If construction or other Project activities are scheduled to occur Nesting surveys by qualified biologists during bird breeding nesting season (typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species); a pre-construction nesting bird survey shall be conducted by a qualified avian biologist prior to Project-related disturbance within and adjacent to the Project area. To avoid direct impacts to avian species, removal of habitat that could support nests and other Project-related disturbance in the Project site shall occur preferably time construction during non-breeding nesting season (September through January). In addition, any clearing of vegetation that may occur is required to take place outside of the nesting season. The survey shall be completed no more than 3 days prior to initial ground disturbance. Time nesting surveys within 3-5 days prior to start of construction for nesting birds and fourteen days prior to start of construction for burrowing owl. A biologist should be present at the start of groundbreaking activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nesting locations and nesting behavior (including but not limited to copulation, carrying food or nesting materials, nest building, agitation, aggressive interaction, feigning injury, or distraction displays), and non-nesting behavior (including but not limited to foraging or habitat defense). The nesting bird survey shall include the Project site and all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures. The applicant will submit the results of the pre-construction survey to CDFW for	Prior to the start of Project related activities	Project Proponent

review and approval prior to initiating any construction activities. If nesting birds or active nests are detected, the biologist shall establish an appropriately sized no-work buffer zone around the nest, which will be based upon the biologist's best professional judgment, the bird's displayed behavior (agitation or stress), the nesting species, its sensitivity to disturbance, nesting stage and expected types, and the intensity and duration of disturbance. The no-work buffer zone shall be clearly marked but should not alert predators. Construction activities shall not occur within any no-work buffer zone until the young birds have successfully fledged and the nest is deemed inactive by the qualified avian biologist.		
BIO-2 Worker Environmental Awareness Program (WEAP): Worker environmental awareness training for nesting birds, Gila Woodpecker and Burrowing Owl (BUOW): • Biology and status; • Protection measures designed to reduce potential impacts to the species, function of flagging designating authorized work areas; A qualified biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site, including but not limited to western burrowing owl (<i>Athene cunicularia hypugaea</i>), Gila woodpecker (<i>Melanerpes uropygialis</i>), California leaf-nosed bat (<i>Macrotus californicus</i>), Pallid bat (<i>Antrozous pallidus</i>), and Townsend's big-eared bat (<i>Corynorhinus townsendii</i>). The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area; (2) training to identify invasive plant species and methods to	Prior to the start of Project related activities	Project Proponent

avoid the spread of invasive plants on and around the Project site; (3) information on special-status species that have the potential to occur on the Project site; (4) Reporting procedures to be used if a any special-status species is encountered on-site. in the field; Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work on-site. and driving procedures and techniques, for commuting, and driving on, to the Project Site; and • Identification of nesting birds and procedures to follow if nesting is suspected.		
BIO-3 Western Burrowing Owl Surveys and Avoidance: Focused Burrowing Owl Surveys To avoid construction-level impacts to unidentified burrowing owls on-site, qualified biologists shall conduct focused burrowing owl surveys during the breeding and non-breeding season in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). The survey shall cover the Project site and a 150-meter (500-foot) buffer, where legally accessible. The Project applicant shall coordinate with CDFW in the preparation of a Burrowing Owl Protection and Mitigation Plan (see below) to allow commencement of disturbance activities on site. A pre-construction survey shall be conducted within 14 days prior to the start of construction activities (see below). Pre-Construction Survey and Avoidance Measures Depending on the Project activity type and associated disturbance, a minimum avoidance buffer distance of 50 meters (165 feet) to 100 meters (330 feet) during the non-breeding season (September through January) and 100 meters (330 feet) to 250 meters (825 feet) during the breeding season (February through August) shall be maintained between active burrows and construction activities. A qualified biologist shall monitor the burrowing owls for any sign of distress and adjust the buffers as necessary to ensure no take occurs.	Prior to the start of Project related activities	Project Proponent

Pre-construction take avoidance surveys for this species shall be conducted within 14 days prior to the start of ground disturbance and 24 hours prior to construction to determine the presence or absence of this species within the Project footprint. A report shall be submitted by a qualified and agency-approved biologist to CDFW. The Project footprint shall be clearly demarcated in the field by the Project engineers and biologist prior to the commencement of the pre-construction take avoidance surveys. The surveys shall follow the guidance of the Staff Report on Burrowing Owl Mitigation (CDFG, 2012). If active burrows are present within the Project footprint and complete avoidance is infeasible, the Project proponent shall not undertake Project activities and Project activities shall be postponed until the appropriate authorization (i.e. CESA incidental take permit under the California Fish and Game Code § 2081) is obtained. Should permanent loss of western burrowing owl habitat occur the ratio of acquisition to loss must be at a minimum of 1:1. The ratio shall be higher for occupied and irreplaceable habitats. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Permanent protection of mitigation land shall be established through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.		
BIO-4 Pre-Construction Plant Surveys:	Prior to the start of Project related activities	Project Proponent

Prior to the start of construction, a qualified biologist² shall conduct a botanical field survey following the methodology described in <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW, March 2018). The survey shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of areas proposed for disturbance and indirectly impacted by the Project. The results of the survey shall be documented in a letter report that will be submitted to ICPDS and CDFW. The survey shall be conducted annually until start of construction to ensure the floristic diversity is accurately captured and effective avoidance, minimization, and mitigation strategies are developed. If special-status plant species are observed during the pre-construction rare plant survey(s) within the development area of the Project, the Project shall be designed to reduce impacts to these species through the establishment of buffers, to the extent feasible. Buffer distances will be determined by the qualified biologist, typically 50 feet or greater from an identified special-status plant species, unless the qualified biologist determines a reduced buffer would suffice to avoid impacts to the species. If avoidance of special-status plant species is not feasible, a Special-Status Plant Relocation Plan shall be developed and implemented. The Special-Status Plant Relocation Plan shall address mitigation for special-status plants, including but not limited to: topsoil salvage to preserve seed bank		
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² Botanical field surveyors should possess the following qualifications: Knowledge of plant taxonomy and natural community ecology; Familiarity with plants of the region, including special status plants; Familiarity with natural communities of the region, including sensitive natural communities; Experience with the CNDDDB, BIOS, and Survey of California Vegetation Classification and Mapping Standards; Experience conducting floristic botanical field surveys as described in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, March 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor; Familiarity with federal, state, and local statutes and regulations related to plants and plant collecting; and Experience analyzing the impacts of projects on native plant species and sensitive natural communities.

and management of salvaged topsoil; seed collection, storage, possible nursery propagation, and planting; salvage and planting of bulbs as feasible; location of on-site receptor sites; land protection instruments for receptor areas; and funding mechanisms. The Special-Status Plant Relocation Plan shall include methods, monitoring, reporting, success criteria, adaptive management, and contingencies for achieving success. The plan shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map and included on the construction, grading, fuel modification, and landscape plans.		
BIO-5 Focused Bat Surveys and Preparation of a Bat Management Plan: All suitable roosting and foraging habitat for local or migratory bat species known to the Project area, including special-status species, found within the Project site and adjacent land shall be surveyed throughout one year, prior to initial site clearing activities. The surveys shall be completed by a qualified bat biologist whose resume shall be reviewed and approved by CDFW. Surveys shall include determination of the approximate size of the colony(s) and species present. The surveys shall include a combination of nighttime emergence counts and acoustic techniques (full spectrum bat acoustic detectors) appropriate for the roosting habitat and time of year, visual and aural surveys (observation during foraging period), and inspection for suitable habitat and bat sign (e.g. guano). Surveys shall be conducted during the spring, summer, fall, and winter to determine how the habitat is being used by bats throughout the year, including foraging patterns and habitat, and the presence overwintering bats, with at least two surveys conducted during the maternity season to determine a pre- and post-volant count of colonies present. If roosting bats, of any status, are found during the surveys, the bats and roosts shall be avoided to the maximum extent practicable with consideration of the most disturbing Project activities and their effect (e.g. demolition and night-time lighting). A Bat Management Plan prepared	Prior to the start of Project related activities	Project Proponent

by the qualified bat biologist identifying situation-specific and species-specific avoidance and minimization measures to reduce impacts to roosting and foraging bats shall be prepared for CDFW's review, approval, and implementation prior to the commencement of initial site clearing activities. The Bat Management Plan shall include, as appropriate to the findings of the surveys and roosting habitat affected, a construction schedule to avoid roosting season, spatial and temporal avoidance measures, non-disturbance buffers, passive exclusion of bats outside of the maternity season (if necessary), and identification of species-specific replacement or alternative habitat to mitigate for permanent maternity or night roosting habitat loss. If roosts cannot be avoided or it is determined that construction activities will cause roost abandonment, a mitigation plan addressing exclusion and passive relocation procedures and impact compensation will be developed. The mitigation plan will be developed in consultation with CDFW and the qualified bat biologist. Roost and foraging habitat shall be replaced in-kind prior to any exclusion or in a timing approved by CDFW. Any exclusion and passive relocation efforts shall avoid periods of sensitive activity (e.g. hibernation or maternity season) and may require several seasons for bats to discover alternative roosting sites.		
BIO-6: Lake and Streambed Alteration (LSA) Agreement The Project shall be designed to avoid all impacts to the Yuma Main Canal, including preventing falling debris during the bridge removal and installation process. If impacts to the Yuma Main Canal cannot be avoided in its entirety, the Project proponent shall notify per Fish and Game Code section 1602 to seek appropriate authorization prior to the start of Project-related activities. If CDFW determines that an LSA Agreement is required and shall be issued, the Project proponent shall comply with the terms of the LSA Agreement, including the mitigation requirements detailed in the LSA Agreement. Mitigation to areas subject to Fish and Game Code section 1602 shall be compensated at one acre of mitigation for every one acre of impact through restoration to pre-project activities, or off-site mitigation that is protected and managed in perpetuity. Permanent protection of mitigation land shall be established through a conservation easement deeded to a nonprofit conservation organization or public agency with a	Prior to the start of Project related activities	Project Proponent

conservation mission, and include development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls, and funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment. Credits at a CDFW-approved mitigation or conservation bank may also be purchases to compensate for permanent impacts.		
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A1

California Department of Fish and Wildlife April 9, 2025, Comment Letter

On the Picacho Road Bridge at Yuma Main Canal Replacement Project

Mitigated Negative Declaration (IS #24-0037)

- A1-1** The comment states that the California Department of Fish & Wildlife (CDFW) received the Notice of Intent (NOI) to Adopt an MND for the Project pursuant to CEQA, thanks the County for the opportunity to provide comments and recommendations on Project activities, and refers to 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 & Game Code. The County acknowledges the comment as an introduction to comments that follow. This comment and the County's response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.
- A1-2** The comment states that CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute, referencing Fish & Game Code, §§ 711.7, subd. (a) & 1802, Pub. Resources Code, § 21070, and CEQA Guidelines § 15386, subd. (a). The comment goes on to state that CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species, and CDFW is charged by law to provide biological expertise during public agency environmental review efforts. The comment further states that CDFW is submitting comments as a Responsible Agency under CEQA, that the Project as proposed may be subject to CDFW's lake and streambed alteration regulatory authority, and that, to the extent implementation of the Project may result in "take" of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), the County may seek related take authorization as provided by the Fish & Game Code.

The County acknowledges CDFW's role and responsibilities under state law and as a Responsible Agency under CEQA. The County disagrees with CDFW's assertion that the Project may be subject to CDFW's lake and streambed alteration regulatory authority. The Yuma Main Canal is not a Water of the US or a Water of the State. It is not a traditional navigable waterway and has no downstream connection to any other water body. The canal is a man-made federal facility owned by the Bureau of Reclamation and is artificially fed to supply irrigation water to the surrounding communities. The canal terminates at the municipal water facility in Yuma, AZ. Therefore, the County does not agree that CDFW has jurisdiction to regulate or require a 1600 permit for the Yuma Main Canal. According to the CDFW 1600-1602 statute, the program scope is for rivers, streams, and lakes. The Yuma Main Canal does not meet the definition of any of these.

Related to the Project's potential to result in "take" of species protected under the California Endangered Species Act (CESA), the Project biologists Glenna Barrett, Jacob Calanno, and Jeremy Scheffler of Barrett's Biological Surveys surveyed the Project area on two separate

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

occasions over three days, On November 5, 2022, and August 8 and 9, 2024. No special status species, including threatened or endangered species, were observed in the Biological Survey Area (BSA). 37 special status animal species and 10 special status plant species were evaluated for their potential to occur within the BSA or adjacent areas (refer to Sensitive Botanical and Zoological Species (CNDDDB/CNPS) table included with the biological resources report prepared for the Project).

No botanical species and only five animal species had any potential to occur within the BSA. Section 4.3.1 of the Biological Resources Report states that “Burrowing owl, Gila woodpecker, or Yuma ridgeway rail were not found within the BSA during the survey. No swallows or bats were observed nesting under bridge. Bank swallows were observed in 2022 offsite as were black-tailed gnatcatcher in 2024.” The Project area is either developed or substantially disturbed with only patches of suitable habitat broken up by the existing bridge and road improvements, dirt roads, and irrigation canals. The Project also includes mitigation measures MM BIO-1 and MM BIO-2 to avoid impacts to protected species, including nesting birds. Therefore, the Project is not expected to result in take of species protected under CESA.

- A1-3** The comment restates summary information contained in the MND related to the Project Description, Objective, and Location, and Construction Timeframe. This comment and the County’s response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.
- A1-4** The comment states that CDFW is concerned there is a lack of appropriate biological resource surveys and supporting documentation provided in the MND and that it is unclear how proposed mitigation measures will be able to reduce the Project’s potentially substantial adverse effect on biological resources to less than significant with mitigation incorporate. The County disagrees with this comment. The footprint of the Project improvements is currently developed, actively farmed, or significantly disturbed. A total of three (3) days of biological surveys were conducted by qualified biologists. No sensitive or special status species were observed within the survey area during any of the three separate survey days and no sensitive vegetation communities or rare plant species requiring protection, avoidance, or mitigation were observed.

The comment further states that mitigation measures currently proposed in the MND would require surveys to be conducted to be able to identify and quantify the biological resources that will be impacted by the Project. The comment suggests that the environmental baseline was not adequately evaluated, and, therefore, impacts to biological resources are not identified and appropriate mitigation measures cannot be formed. The comment states that baseline surveys should have already been conducted and included in the environmental document, and appropriate mitigation for on-site resources should have been included in the MND, as deferment does not allow the development of effective mitigation measures.

The County disagrees with this comment. As stated above, biological surveys of the Biological Survey Area were conducted by qualified biologists on three separate occasions. As a result of those surveys, no candidate, sensitive, or special status species was observed within the BSA. The survey report notes the potential for certain species, specifically the

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

Burrowing owl, Bank swallows, and black-tailed gnatcatchers, to present offsite. Therefore, the environmental baseline was adequately established, biological resources were identified, and potential impacts were appropriately assessed. Accordingly, appropriate mitigation was included in the MND, and no deferment of biological impact assessments or mitigation measures would occur.

As stated in the MND, “(t)he proposed Project does not impact or modify habitat that would have a substantial adverse effect 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. The top of the bridge is asphalt, heavily travelled and is not biologically sensitive. In regard to special-status plant species, a search of the Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle, listed 10 botanical species within the Quadrangle searched. ***None would be expected to be found within the Project Site.*** In regard to special-status animal species, a search of Sensitive Botanical and Zoological Species (CNDDDB/CNPS) Yuma East and West Quadrangle listed 37 zoological species within the Quadrangles searched. Of these, two species: Gila woodpecker (*Melanerpes uropygialis*) and Burrowing owl (*Athene cunicularia*) were noted. ***Burrowing owls could be expected outside the proposed Project setting but were not observed during (the) survey*** (See Biological Resources Survey, Appendix B). ***Gila woodpeckers could be found roosting or nesting in palm trees present off site.***” (see MND, Section IV. Biological Resources, page 25). Also refer to the Response A1-2 above.

As a result of the bio surveys, two mitigation measures, MM BIO-1 and MM BIO-2, were identified to reduce potential impacts to burrowing owls, Gila woodpeckers, and nesting birds to less than significant. BIO-1 would require Nesting Bird Surveys during the breeding season (February 1st through August 31st) prior to the start of construction. BIO-2 would require worker environmental awareness training to minimize potential impacts to protected bird species, including burrowing owls and Gila woodpeckers, by delineating and flagging authorized work and vehicle access areas, requiring reporting if a species is encountered in the field, and identification and avoidance of nesting birds observed on or near the Project Site.

The County appreciated that CDFW responded to the MND with their comments and recommendations (included as Attachment A, “Draft Mitigation, Monitoring, and Reporting Program,” to their comment letter). The County has largely incorporated these recommended revisions to the Mitigation Measures in the MND. The revised and added mitigation measures can be found in the Final Draft MND.

- A1-5** The comment states “There is a discrepancy in the number of general reconnaissance biological surveys conducted – the Summary of the Natural Environment Study in Appendix B states that two surveys were conducted, but Section 2.2.1 (Survey Methodologies) lists three survey dates. Neither the MND nor the Natural Environment Study in Appendix B describe the survey methods and no species focused surveys were conducted.” As stated above, two full general biological surveys were conducted over the course of three days, the

first full survey was conducted on November 5, 2022, and the second full survey was conducted over two days, August 8 and 9, 2024.

The comment also states that the surveys conducted did not follow CDFW guidance and protocol. The County disagrees with this comment, the general biological surveys were conducted by three qualified biologists with over twenty (20) years of experience in the Project area. The County does not agree that potential Project impacts to candidate, sensitive, or special status species were mischaracterized, resulting in avoidable, unminimized, or unmitigated impacts not identified or analyzed by the MND. The levels of significance were accurately established, and the mitigation measures were created based off the findings of the general biological surveys conducted. This BSA is primarily developed on or disturbed with little to no potential to support rare plants.

The comment states the CDFW “recommends that ICPDS conduct species-focused surveys per CDFW’s guidance and protocols and incorporate the results into the MND.” The County does not agree that species-focused surveys are required as the findings of the biological surveys show that there is no potential for special status species to occur within the BSA. Potential impacts to the three species identified, burrowing owl, Gila woodpecker, and black-tailed gnatcatcher, which are only expected to occur outside of the BSA, would be less than significant with the implementation of BIO-1 and BIO-2.

- A1-6** The comment states no plant surveys were conducted following CDFW’s survey protocol for special-status native plant populations and natural communities, that the general reconnaissance biological surveys were conducted outside of several special-status plants’ bloom periods, and that neither the MND nor Natural Environment Study in Appendix B include measures to avoid, minimize, or mitigate impacts to any special-status plant species, should they be found on the Project Site during construction. CDFW recommends botanical field surveys following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, March 2018) be conducted annually prior to the start of construction by qualified personnel. One botanical field survey may not be sufficient to detect plants that are not evident and identifiable every year. CDFW recommends MM BIO-4 Pre-Construction Plant Surveys, listed in Attachment A, to be incorporated into the MND. Notwithstanding the lack of suitable habitat to support rare plants in much of the BSA, the County agrees that the biological surveys for this Project were not within the blooming period of rare plants that could potentially occur in the area. The County has added a new mitigation measure, MM BIO-4, into the MND. MM-BIO-4 substantially conforms with CDFW’s recommended mitigation measure.

- A1-7** The comment states that CDFW “recommends focused burrowing owl surveys following the guidance in the Staff Report on Burrowing Owl Mitigation (CDFG, March 2012). If active burrows are present within the Project footprint during pre-construction take avoidance surveys and complete avoidance is infeasible, the Project proponent shall not undertake Project activities and Project activities shall be postponed until the appropriate authorization (i.e. CESA ITP under the California Fish and Game Code § 2081) is obtained. CDFW recommends MM BIO-3 Western Burrowing Owl Avoidance and Mitigation, listed in Attachment A, to be incorporated into the MND.” The County acknowledges CDFW’s

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

concern and recommendation, however, the Project Site is not burrowing owl habitat as it is developed, disturbed, or vegetated with salt cedar. This was determined during the 3 site visits in which no potential habitat for burrowing owl was observed, therefore protocol surveys for Burrowing owls are not warranted. However, in an effort to address CDFW's concern, the County has added a new mitigation measure, MM BIO-3, into the MND. MM-BIO-3 substantially conforms with CDFW's recommended mitigation measure.

- A1-8** The comment states the CDFW "recommends MM BIO-5 Focused Bat Surveys and Preparation of a Bat Management Plan, listed in Attachment A, to be incorporated into the MND." The biological surveys were conducted during daylight hours during which no bats were visually observed roosting under the bridge. The existing bridge is unlikely to support roosting bats due to its minimal freeboard above the high-water surface of the canal and there is no other suitable bat habitat in the BSA. The County does agree that a measure should be added to prevent potential roosting bats from being impacted by the Project activities, however in an effort to address CDFW's comment, the County has added a new mitigation measure, MM BIO-5, into the MND. MM BIO-5 substantially conforms with CDFW's recommended mitigation measure, however the County does not agree with the specific recommended measure to conduct multiple bat surveys throughout a one-year period prior to construction. The specific Project area conditions are not conducive to bat roosting, and no bats were observed during either of biological surveys of the Project area. Therefore, multiple focused bat surveys are not warranted.
- A1-9** The comment states the CDFW "recommends that ICPDS require the Project proponent to submit a notification per Fish and Game Code section 1602 prior to commencing Project construction activities. CDFW recommends MM BIO-6 Lake and Streambed Alteration (LSA) Agreement to be incorporated into the MND." The County disagrees with this comment, the Yuma Main Canal is not a Water of the US or a water of the state, it is not a traditional navigable waterway and has no downstream connection to any other water body. The canal is a federal facility owned by the Bureau of Reclamation and is artificially fed to supply irrigation water to the surrounding communities. The canal terminates at the municipal water facility in Yuma, AZ. The County does not agree that CDFW has jurisdiction to regulate or require a 1600 permit for the Yuma Main Canal. According to the CDFW 1600-1602 statute, the program scope is for rivers, streams, and lakes. The Yuma Main Canal does not meet the definition of any of these.
- A1-10** The comment states the CDFW "recommends listing specific and enforceable BMPs, describing how the proposed BMPs will prevent Project construction activities from contacting the water in the Yuma Main Canal. CDFW also recommends that ICPDS notify CDFW per Fish and Game Code section 1602, in the event that in-water work does occur. Additionally, CDFW recommends providing a map with ESA-designated areas clearly delineated." The MND states the original bridge pylons will be removed by crane; with best management practices will be employed to minimize removal impacts and will not alter the streambed or employ dredging activities. As mentioned in the previous response (A1-9), the County does not agree that a 1602 permit would apply to the Yuma Main Canal. The MND states that "areas outside of the Project footprint will be designated as an ESA on Project plans. No Project-related activities will take place within the ESA-designated areas." The

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

Appendix B to the MND is clear that the ESA areas are “any area not within the Project footprint.” Best Management practices will be included in construction bidding requirements and enforced by the County throughout construction.

- A1-11** The comment states that MM BIO-2 does not address invasive plants, despite the Natural Environment Study in Appendix B including a measure addressing invasive plants under the Avoidance and Minimization Efforts/Compensatory Mitigation section. CDFW recommends creating a worker environmental awareness program (WEAP) that is specific to the Project. CDFW also suggests creating separate mitigation measures for pre-construction nesting bird surveys (see Comment 8) and WEAP to ensure compliance and enforceability of on-site personnel during Project activities. CDFW provides revisions to MM BIO-2 in Attachment A. The County agrees with the recommended revisions to MM BIO-2 and has revised MM-BIO-2 in the MND to substantially conform to CDFW’s recommended mitigation measure.
- A1-12** The comment states MM BIO-2 defers avoidance and minimization measures, stating “identification of nesting birds and procedures to follow if nesting is suspected.” CDFW suggests splitting MM BIO-2 to ensure compliance and enforceability and provides revisions to MM BIO-1 in Attachment A to their letter. The County generally agrees with the recommended changes. Mitigation Measures BIO-1 and BIO-2 have been revised to substantially conform to CDFW’s recommended measures.
- A1-13** The comment states that there is a typo on pages 11 and 14 of the MND which states that the Project location is south of Interstate 8 (I-8) and southeast of Mexico. The comment also states that the page 24 of the MND states that Project construction will start at the beginning of 2024. The Project is north of I-8 and Mexico, and construction is slated to begin in 2026. The County has made these corrections to the MND.
- A1-14** The comment states that the MND is unclear on what type of swallows were observed in the Project vicinity, stating that page 12 of the MND states that bank swallows (*Riparia riparia*) were observed in the buffer zone, but Table 2 lists barn swallows (*Hirundo rustica*) as found in the vicinity instead. The comment states that the remainder of the MND and Natural Environment Study in Appendix B only mention bank swallows and not barn swallows, adding that bank swallows are a CESA-listed threatened species (CDFW, April 2025). CDFW recommends clarifying the type of swallows observed during the general reconnaissance biological surveys. The County disagrees with this comment. Barn swallows were identified within the BSA (refer to Appendix B, Section 3.1.3, Table 2). Appendix B also notes that bank swallows were observed offsite. There is no inconsistency.
- A1-15** This comment requests reevaluation of the presence of the Colorado Desert fringe-toed lizard (*Uma notata*) based on habitat types within the Project Site. The fringe toed includes fine, wind-blown sand, including dunes, flats with sandy hummocks formed around the bases of vegetation, washes, and the banks of rivers. This species needs fine, loose sand for burrowing, however the Project Site is either developed, heavily disturbed, or active agricultural fields. No fine, loose sand and no hummocks are found within the Project Site. Therefore, the County does not agree that the BSA should be reevaluated for the presence of this species.

Picacho Road Bridge Project (IS #24-0037) — Responses to Comment Letters

- A1-16** The comment states that the Sensitive Botanical and Zoological Species (CNDDDB/CNPS) chart in the Natural Environment Study states that no habitat is expected for Gila woodpecker (*Melanerpes uropygialis*), but page 25 of the MND and pages 13 and 15 of the Natural Environment Study state that palm trees are available in the Project vicinity that could allow roosting or nesting. CDFW recommends correcting the MND and Natural Environment Study for consistency on Gila woodpecker. The County does not agree with this comment. The vegetation mapping for the BSA does not show any palms within the BSA. There is one palm on the north side outside of the BSA and one on the south side outside of the BSA; The BSA includes the Project footprint and a construction buffer area. Therefore, there is no need for re-evaluation.
- A1-17** The comment states that 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 and requests that the County report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The County acknowledges the requirement per Public Resource Code §21003, subd. (e) and will report any special species detected to the CNDDDB.
- A1-18** The comment states that the Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary, noting that fees are payable upon filing of the Notice of Determination (NOD) by the Lead Agency. The County acknowledges the comment and will pay the required filing fees upon filing of the NOD.
- A1-19** The comment provides contact information for further coordination. The County acknowledges the comment and notes it provides concluding remarks as well as a reference to Attachment A of the letter provided by CDFW. The County has reviewed Attachment A and incorporated most CDFW's requested changes to the biological resource mitigation measures.
- A1-20** The comment includes the various references CDFW utilized to prepare their comment letter. The County acknowledges the various references. The references will be included in the MND for the Project and made a part of the Administrative Record.
- A1-21** The comment includes CDFW's various recommended changes and additions to the mitigation measures for the Project. The County appreciates CDFW providing these changes and additions and, with the exception of CDFW's recommended mitigation measure BIO-6 related to Lake and Streambed Alteration Agreement, has substantially incorporated these mitigation measures into the MND.

AIR POLLUTION CONTROL DISTRICT



April 9, 2025

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

RECEIVED

By Imperial County Planning & Development Services at 9:27 am, Apr 10, 2025

SUBJECT: Notice of Intent for a Mitigated Negative Declaration for Initial Study 24-0037 for Picacho Road Bridge Replacement Project – Imperial County Department of Public Works

Dear Mr. Minnick:

A2-1

The Imperial County Air Pollution Control District (Air District) would like to thank you for the opportunity to review and comment on the Notice of Intent (NOI) for a Mitigated Negative Declaration (MND) for Initial Study (IS) 24-0037(Project). The project proposes replacing the existing Picacho bridge which leads into the Townsite of Winterhaven due to cracking and outliving its useful life. The project is located along Picacho Rd. in Winterhaven and spanning over the Yuma Main Canal and is also identified with Assessor's Parcel Number 056-600-011.

A2-2

The Air District provided comments for the project previously in a letter dated October 24, 2024 and will reiterate some of its relative comments: the project must comply with all Air District Rules & Regulations including Regulation VIII – Fugitive Dust Rules, a collection of rules designed to maintain fugitive dust emissions below 20 % visual opacity, as was previously recognized by the applicant. If the project will operate combustion equipment, such as a generator, it should be registered with California Air Resources Board (CARB) Portable Equipment Registration Program (PERP) or it may be subject to Air District permitting requirement under Air District Rules 201, 202, 207, & 208. The applicant should submit an application for engineering review of the equipment if it is not PERP registered to determine its permitting requirements.

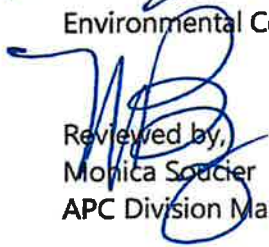
A2-3

For your convenience, all Air District rules and regulations can be accessed online at <https://apcd.imperialcounty.org/rules-and-regulations> and engineering application can be found at <https://apcd.imperialcounty.org/engineering/>. Should you have any questions or concerns please feel free to contact the Air District by calling our office at (442) 265-1800.

Respectfully,



Ismael Garcia
Environmental Coordinator



Reviewed by,
Monica Soucier
APC Division Manager

A2

Imperial County Air Pollution Control District April 10, 2025, Comment Letter

On the Picacho Road Bridge at Yuma Main Canal Replacement Project

Mitigated Negative Declaration (IS #24-0037)

- A2-1** The comment thanks the County for the opportunity to review and provide comments on the MND, and provides a brief description of the Project. The County acknowledges the comment as an introduction to comments that follow. This comment and the County's response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.
- A2-2** The comment states that the Air District provided comments on the project previously in a letter dated October 24, 2024, and reiterates some of its relative comments from that letter. The comment references the Air District Rules & Regulations including Regulation VIII-Fugitive Dust Rules, the Portable Equipment Registration Program (PERP), and Air District Rules 201, 202, 207, and 208. The comment states that the County should submit an application for engineering review of the equipment if it is not PERP registered to determine its permitting requirements. The County acknowledges the District's equipment registration and air quality rules and regulations and commits to complying with these regulations through its contractor bidding requirements for the Project.
- A2-3** The comment provides links to download the Air District's rules and regulations and engineering application. The County appreciates the Air District's assistance with complying with its regulatory and engineering requirements. This comment and the County's response are included in the Final MND for review and consideration by the decision-makers prior to making a final decision on the Project.