

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE AGENDA DATE: April 9, 2026

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME 1:30 PM / No.2

PROJECT TYPE: CUP #26-0001 / IS #26-0001 (NHHA) SUPERVISOR DIST # 5

LOCATION: 1131 and 1147 Yourman Road, APN: 054-680-007 & 054-680-008

Heber, CA 92249 PARCEL SIZE: +/-3.93 AC

GENERAL PLAN (existing) Specific (Imperial Center SPA) GENERAL PLAN (proposed) N/A

ZONE (existing) ICC-G-SPA ZONE (proposed) N/A
(Imperial Center Commercial with Geothermal Overlay within a Specific Plan Area)

GENERAL PLAN FINDINGS CONSISTENT INCONSISTENT MAY BE/FINDINGS

PLANNING COMMISSION DECISION:

HEARING DATE: _____

APPROVED DENIED OTHER

PLANNING DIRECTORS DECISION:

HEARING DATE: _____

APPROVED DENIED OTHER

ENVIRONMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 04/09/2026

INITIAL STUDY: #26-0001

NEGATIVE DECLARATION MITIGATED NEG. DECLARATION EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
AG	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
APCD	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
E.H.S.	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
FIRE / OES	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
SHERIFF	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED

OTHER: Agua Caliente Tribe, CEO's.

REQUESTED ACTION:

(See Attached)

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

- NEGATIVE DECLARATION**
 MITIGATED NEGATIVE DECLARATION

*Initial Study & Environmental Analysis
For:*

**Conditional Use Permit #26-0001
Initial Study #26-0001
NHHA (National Healthcare & Housing Advisors)**



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
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April 2026

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SECTION 1 INTRODUCTION

A. PURPOSE

This document is a policy-level, project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #26-0001 (Refer to Exhibit "A" & "B").

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

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

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

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

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

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

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

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

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

principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

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

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a 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 Negative Declaration.

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

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

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

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”.
4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and 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. Tying is defined as follows:

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

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

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

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

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

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

2. Incorporation By Reference

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

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

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

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

II. Environmental Checklist

1. **Project Title:** Conditional Use Permit (CUP) #26-0001 / Initial Study #26-0001
NHHA (National Healthcare & Housing Advisors)
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:**
Rocio Yee, Planner II,
(442)265-1736, ext. 1750
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** rociyee@co.imperial.ca.us
6. **Project location:** 1131 & 1147 Yourman Rd. Heber CA. 92249
APN: 054-680-007-000 & 054-680-008-000
LOT 7 OF IMPERIAL CENTER SUB UN1 TR954 1.88AC &
LOT 8 OF IMPERIAL CENTER SUB UN1 TR954 2.05AC
7. **Project sponsor's name and address:**
Paul Leon, RN, BSN, PHN, FAAN
Chief Executive Officer
National Healthcare & Housing Advisors, LLC
1720 Termino Avenue, Long Beach, CA 90804
8. **General Plan designation:** Specific (Imperial Center)
9. **Zoning:** ICC-G-SPA (Imperial Center Commercial with Geothermal Overlay within a Specific Plan Area).
10. **Description of project:** The applicant is requesting a Conditional Use Permit to operate an Interim Recuperative Care and Transitional Housing facility within the Imperial Center Specific Plan Area. NHHA's CalAIM (Care Continuum Leveraging California Advancing and Innovating Medi-Cal) program provides day habilitation, recuperative care, short-term post-hospitalization services, community health worker services, a sobering center, enhanced care management, behavioral health services, and street medicine. The ultimate goal of the Care Continuum is to secure permanent housing and long-term housing stability for each client. Housing services may be extended for an additional six (6) months after the initial 90-day recuperative care period has expired. The facility will provide services for approximately 80–100 clients and will employ up to 50 team members hired locally. The hours of operation for the site will be 24 hours a day, Monday through Sunday.
11. **Surrounding land uses and setting:** The project site located in Heber CA, within the Imperial Center Specific Plan Area, surrounded by Imperial Center Commercial Lots to the East and active farmland to the West and North and an Industrial Trucking Storage Facility to the South of the Imperial Center property.
12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.): Planning Commission, Imperial County Air Pollution Control District, Imperial County Environmental Health Services, and Imperial County Fire Department.
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.?**

The AB 52 Notice of Opportunity to consult was mailed via certified mail to the Quechan Indian Tribe, Campo Band of Mission Indian Tribes and Agua caliente Tribe on January 26, 2026, for their review and comment; no comments were received to this date.

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.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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

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

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

Found that although the proposed project could have a significant effect on the environment, ~~because~~ all potentially significant effects (a) have been analyzed adequately in an earlier 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.

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

Jim Minnick, Director of Planning/EEC Chairman

Date:

PROJECT SUMMARY

- A. Project Location:** The project site is located at 1131 & 1147 Yourman Rd. Heber 92249 with Assessor's Parcel Numbers (APN) 054-680-007-000 & 054-680-008-000; legally described as LOT 7 OF IMPERIAL CENTER SUB UN1 TR954 1.88AC & LOT 8 OF IMPERIAL CENTER SUB UN1 TR954 2.05AC. The proposed project is located within the Imperial Center Specific plan area.
- B. Project Summary:** The applicant is requesting a Conditional Use Permit to operate an Interim Recuperative Care and Transitional Housing facility within the Imperial Center Specific Plan Area. NHHA's CalAIM (Care Continuum Leveraging California Advancing and Innovating Medi-Cal) program provides day habilitation, recuperative care, short-term post-hospitalization services, community health worker services, a sobering center, enhanced care management, behavioral health services, and street medicine. The ultimate goal of the Care Continuum is to secure permanent housing and long-term housing stability for each client. Housing services may be extended for an additional six (6) months after the initial 90-day recuperative care period has expired. The facility will provide services for approximately 80–100 clients and will employ up to 50 team members hired locally. The hours of operation for the site will be 24 hours a day, Monday through Sunday.
- C. Environmental Setting:** The proposed project is located within the Imperial Center Specific Plan Area in Heber. The project site has been used in the past and is currently vacant. Initial Study No. 26-0001 will evaluate potential impacts associated with the proposed project within the ICC-G-SPA zone (Imperial Center Commercial with Geothermal overlay within a Specific Plan Area).
- D. Analysis:** The proposed project went to a Planning Commission hearing for a similarity of use of a Hotel / Transitional Housing, with an approved conditional use permit, according to the Imperial Center Specific Plan Area. The applicant has submitted a conditional use permit for the proposed project of a recuperative Care and Transitional Housing Facility.

Under the Imperial Center Specific Plan Area, the proposed project is located within an ICC-G-SPA zone (Imperial Center Commercial with Geothermal overlay within a Specific Plan Area) per Zone Map #12 of the Imperial County Land Use Ordinance (Title 9). Initial Study #26-0001 will analyze any impacts related to the proposed project.

- E. General Plan Consistency:** The project is located within an area designated as Specific according to the General Plan, and the parcel is zoned ICC-G-SPA zone (Imperial Center Commercial with Geothermal overlay within a Specific Plan Area). The project could be considered consistent with the General Plan and the County Land Use Ordinance upon the approval of the proposed CUP.

Exhibit "A"
Vicinity Map

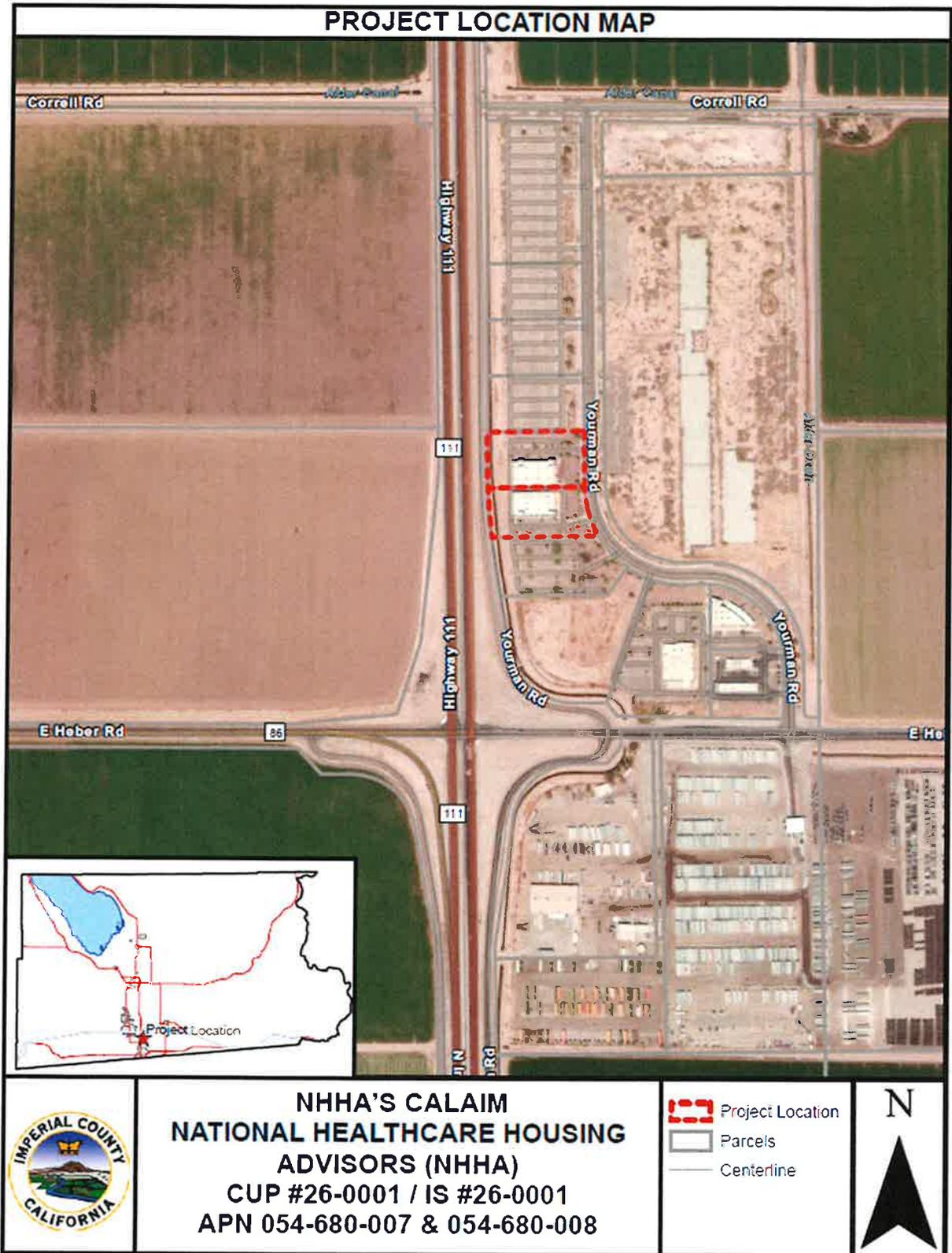
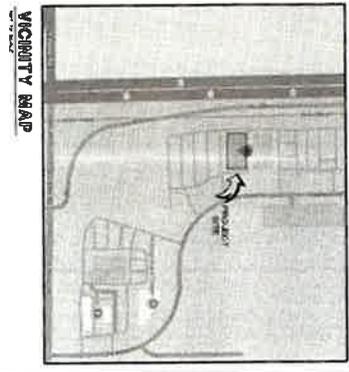
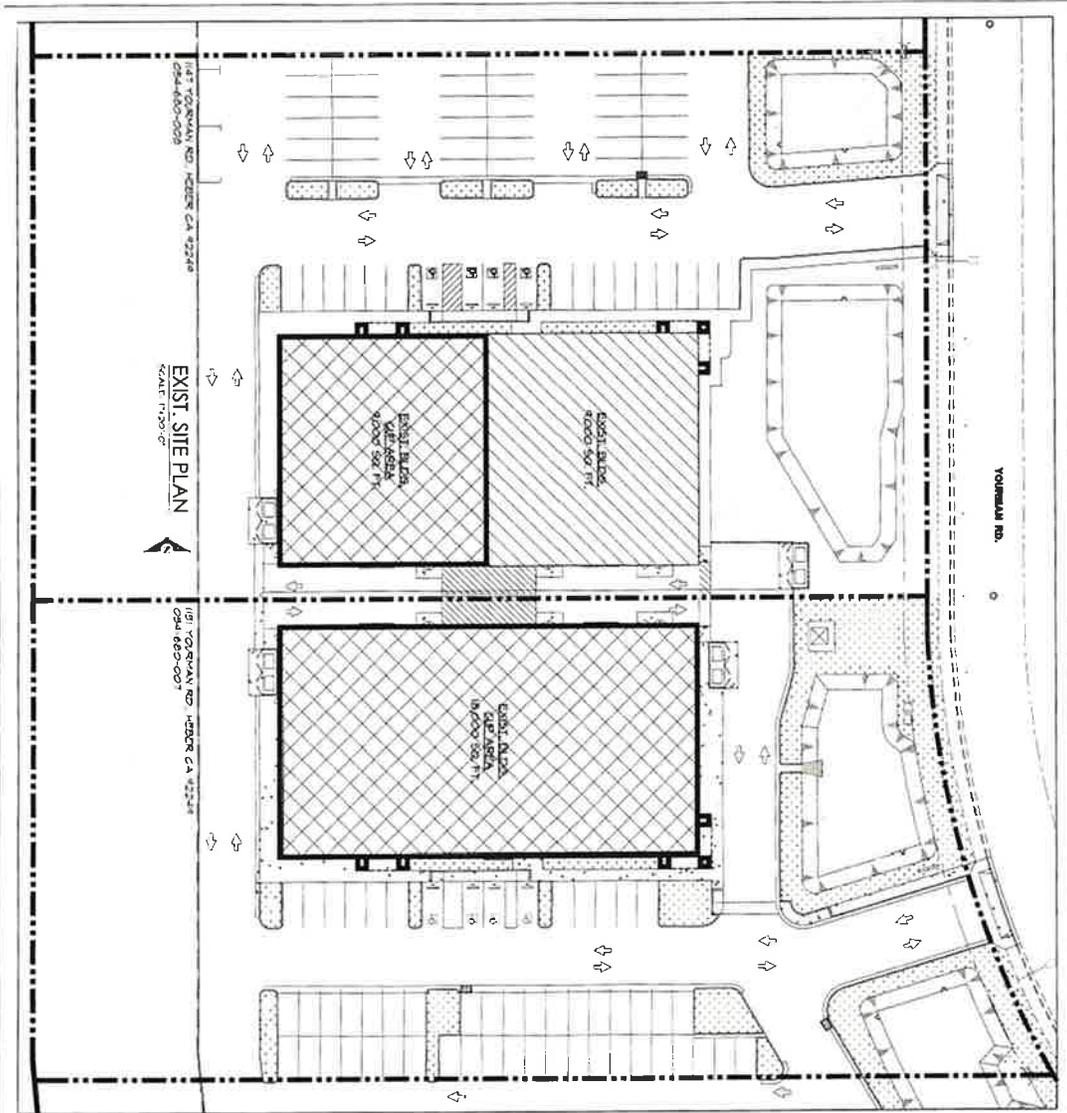


Exhibit "B" Site Plan/Tract Map/etc.



PROJECT DATA #1

PROJECT LOCATION: 101 YOUNGDALE RD - JORDEN CA 92248
 PROJECT TYPE: COMMERCIAL/INDUSTRIAL
 PROJECT AREA: 140,000 SQ. FT.
 PROJECT PERMIT: 2025-095

PROJECT DATA #2

PROJECT TYPE: COMMERCIAL/INDUSTRIAL
 PROJECT AREA: 140,000 SQ. FT.
 PROJECT PERMIT: 2025-095

PROJECT DATA #3

PROJECT TYPE: COMMERCIAL/INDUSTRIAL
 PROJECT AREA: 140,000 SQ. FT.
 PROJECT PERMIT: 2025-095

<p>NONA SIMILAR USE PROCESS</p> <p>DATE AS SHOWN: 11/10/2025</p> <p>SITE PLAN</p>	<p>DUGGINS CONSTRUCTION</p> <p>141 WEST CHURCH COURT, ANAHEIM, CA 92805 PHONE: 714.944.1111 FAX: 714.944.1112 WWW.DUGGINSCONSTRUCTION.COM</p>	<p>25010011</p> <p>NO OTHER PROJECTS ARE BEING CONSIDERED FOR THIS SITE AT THIS TIME. THE PROJECT IS BEING CONSIDERED AS A SINGLE PROJECT AND IS NOT BEING CONSIDERED AS PART OF A LARGER DEVELOPMENT.</p>
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EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

I. **AESTHETICS**

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

- a) Have a substantial adverse effect on a scenic vista or scenic highway?
a) The proposed project is located at 1131 and 1147 Yourman Road in Heber, CA 92249, within the Imperial Center Specific Plan Area. Although the site lies east of State Highway 111, a Programmatic Environmental Impact Report (PEIR) was previously prepared for the area, and applicable mitigation measures have been incorporated. These include improvements recommended by the traffic study along SR 111 and the potential relocation of Yourman Road, as determined necessary by the County Department of Public Works and the Heber Public Utility District. Therefore, any potential impacts are considered less than significant.

- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?
b) As noted in Section I(a), the proposed project will utilize two existing buildings within the Imperial Center Specific Plan Area. Existing vegetation is already present on-site, and no new landscaping is proposed by the applicant. Therefore, the project will not impact scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway, and no impact is anticipated.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
c) The proposed project is consistent with current zoning and land uses in the surrounding parcels with an approved conditional use permit. The site is zoned for ICC-G-SPA (Imperial Center Commercial with Geothermal overlay within a Specific Plan Area) and has been previously impacted by the Imperial Center Specific Plan Area existing buildings. Therefore, a less than significant impact is expected.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
d) The proposed project involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. Therefore, it is not expected that a new source of substantial light or glare would adversely affect day or nighttime views in the area. In case of any additional lighting, the applicant shall comply with the ICSPA (Imperial Center Specific Plan Area) requirements that state Lighting of signs attached to buildings shall be arranged as not to produce glare on adjacent properties in the vicinity and the source of light shall not be visible from adjacent property or public street. Ensuring the use of appropriate lighting will reduce the project's impact to a less-than-significant level.

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 was already evaluated in the Imperial Center Specific Plan Area site and is listed as "Urban and Build-up Land" located outside the survey boundary per the California Farmland Mapping & Monitoring Program: Imperial County Important Farmland 2018 Map³. Therefore, the proposed project will not convert any type of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impacts are expected.

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

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) The County of Imperial has no current active Williamson Act contracts; therefore, the proposed project is not expected to conflict with existing zoning for agricultural use, or a Williamson Act Contract. No Impacts are expected.				
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 site is not zoned for, nor does it contain forest land or timber land. As such, the project would not impact forest or timberlands. No impact is expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? d) As previously stated under item (II)(c) above, the proposed project is not located in forest land, therefore, it is not expected to result in the loss of forest land or conversion of forest land to non-forest. No impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? e) There is no existing farmland or forestland on or in the immediate vicinity. Development of the proposed project would not result in the loss or conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, no impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

iii. **AIR QUALITY**

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

a) Conflict with or obstruct implementation of the applicable air quality plan? a) The proposed involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility, and it is not expected to conflict with or obstruct implementation of the applicable air quality plan. Per Imperial County Air Pollution Control District's comment letter²⁰ dated February 4, 2026, the project must adhere to all Air District rules and regulation. In case of construction a notification form must be filed with the Air District no less than 10 days prior to the start of construction. Adherence and compliance with ACPD's rules and regulations will bring any impact to less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? b) As previously stated under item (III)(a) above, the applicant shall comply with the rules and regulations of the Imperial County Air Pollution Control District, therefore, it is not expected that the proposed project would substantially contribute to an existing or projected air quality violation. Therefore, any impacts are expected to be less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutants concentrations? c) The proposed project is not expected to expose sensitive receptors to substantial pollutants since the project will be adjusted to two existing buildings within the Imperial Center. Compliance with APCD's requirements listed in the comment letter received February 4th would bring any impact to less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)? d) The proposed project is not expected to expose sensitive receptors to substantial pollutants concentrations. Furthermore, with the continued adherence to the ICACPD requirements as shown above, any impacts would remain at a level less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

a) The project location is within the Imperial Center Specific Plan Area, as part of the Mitigation Measures under the Biological Resources portion is stated that, this site has been disturbed for decades, including deep plowing and other farm practices. There are no known species in this area that are considered to be on any endangered species list or are otherwise protected. A burrowing owl survey has been completed and is discussed in the SPA. No burrowing owls or active burrows were observed on the Imperial Center site. Therefore, the project levels are expected to be less than significant.

- 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) According to the Imperial County General Plan's Conservation and Open Space Element⁴, the project site is not within a sensitive or riparian habitat, or on other sensitive natural community. The proposed project consists of adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. The proposed project doesn't expect to have a substantial adverse effect on any riparian habitat or other sensitive natural community; therefore, no impacts are expected.

- 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) According to the National Wetlands Inventory: Surface Waters and Wetlands Map⁵, the proposed project is not located within a riparian habitat and will not cause a substantial adverse effect on federal protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Any impacts are expected to be less than significant.

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

d) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. As previously stated on item (IV)(b) above, the project site is not located within a Sensitive Habitat; therefore, it would not 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. Therefore, no impact is expected.

- 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 conflict with any local policy or ordinance protecting biological resources, such as tree preservation policies or ordinances. No impacts are expected.

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

f) The proposed project site is not located within a designated sensitive area according to the Imperial County General Plan's Conservation and Open Space Element⁶, therefore, it would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any impacts are expected to 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) The proposed project site is located within disturbed land in the Imperial Center Specific Plan Area. Additionally, AB52

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Letter were sent out to Agua Caliente Tribe Band of Cahuilla Indian Tribe, Campo Band of Mission Indian Tribe, and Quechan Tribe, on January 26, 2026, for a 30-day commenting period. No comments for the proposed project were received from the tribes. Therefore, the project will not appear to cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 (Determining the Significance of Impacts to Archaeological and Historical Resources); Therefore, any impacts are considered less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) As mentioned under item a) above, the proposed project is located on previously disturbed land and it is not likely that any historical, archaeological or human remains will be discovered. Therefore, any impact would be less than significant. | | | | |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) As mentioned under item a) above, the proposed project and facility is located on disturbed land zoned for commercial type uses and is not expected to directly or indirectly destroy a unique paleontological resource or unique geologic feature. Therefore, a less than significant impact is expected. | | | | |

VI. **ENERGY** *Would the project:*

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. As such, the property has already been disturbed by prior development. Therefore, it will not result in potentially significant environmental impact due to wasteful, insufficient, or unnecessary consumption of energy resources, during the project construction or operation. Any future developments would require compliance with the latest edition of the California Building Code. Therefore, a less than significant impact is expected. | | | | |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) As previously stated on item (VI)(a) above, the proposed project is for the adaptation of a NHHA facility in two existing commercial buildings, with no changes to the existing zoning. Any developments would require compliance with the latest energy efficiency and renewable energy standards and regulations. Therefore, the proposed project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Any impacts are expected to be less than significant. | | | | |

VII. **GEOLOGY AND SOILS** *Would the project:*

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility, and it does not appear to conflict with the geology and soils of adjacent parcels in the area. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects regarding impacts to geology and soils. Any impacts are expected to be less than significant. | | | | |
| 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 1) The proposed project is not located or near a known fault; therefore, a less than significant impact is expected. | | | | |
| 2) Strong Seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2) As previously stated on item (VII)(a)(1) above, the proposed project is not located near a known fault, therefore strong seismic ground shaking is not anticipated, and any impacts are expected to be less than significant. | | | | |
| 3) Seismic-related ground failure, including liquefaction and seiche/tsunami? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) The proposed project site is not located in a seiche/tsunami area per the California Tsunami Data Maps¹³. Any impacts are expected to be less than significant. | | | | |

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
4) Landslides? 4) The site is not located within a landslide hazard zone; therefore, no impacts are expected to occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil? b) According to Imperial County General Plan's Seismic and Public Safety Element¹⁴, "Erosion Activity Map^{14b}," Figure 3, the proposed project is not located within an area of substantial soil erosion. Any impacts are expected to be less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? c) The proposed project site is not located on a geological unit that would become unstable or collapse as a result of the proposed NHHA interim recuperative housing facility. Any needed construction will be subject to compliance with the latest edition of the California Building Code as well as going through a ministerial building permit review. Adherence and compliance to these standards and regulations during construction would bring any impact levels to less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 proposed project is not located on an expansive soil area. However, as previously stated on section (VII)(c), any new developments will require adherence and compliance to the California Building Code, standards and regulations and the ministerial building permit review would bring any impacts to less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? e) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. Adherence and compliance with Imperial County Public Health Department, Division of Environmental Health standards and regulations would bring any impact to less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? f) The proposed project does not appear to directly or indirectly destroy a unique paleontological resource or site of unique geologic features on site as there are no known unique resources or features on site or records of; therefore, no impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VIII. **GREENHOUSE GAS EMISSION** *Would the project:*

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
a) The proposed project is not expected to generate greenhouse gas emissions since there are no ground moving activities being proposed, not any major construction activities being planned for; therefore, minimal traffic and emissions are expected. Adherence and compliance to ACPD's rules and regulations will bring any impacts to less than significant levels. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
b) The proposed project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The facility site was previously utilized for commercial purposes. Therefore, less than significant impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) The proposed project is located within the Imperial Center Specific Plan Area on previously disturbed land. Patients admitted to the NHHA facility will be responsible for independently managing their own medication. A double-locked storage space will be provided for secure medication storage. Any unused medication or hazardous waste will be collected by a third-party vendor, Biola, which will remove and dispose of biohazardous materials off-site. Therefore, the proposed project is not expected to pose a significant hazard to the public or the environment, and impacts are anticipated to be less than significant.				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) As discussed above in Section IX(b), the proposed project is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials. A third-party waste vendor will be responsible for removing any hazardous materials from the facility for proper off-site disposal. Therefore, impacts are anticipated to be less than significant.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) The proposed project does not anticipate the emitting of hazardous emissions, or the handling of hazardous or acutely hazardous materials, substance or waste as previously stated on items (IX)(a) and (IX)(b) above; therefore, less than significant impacts are expected.				
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) The proposed project is not located on a site included on a list of hazardous materials sites according to California Department of Toxic Substances Control EnviroStor¹⁶; therefore, no impacts are expected.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) The proposed project is not located within an airport land use plan per Imperial County Airport Land Use Compatibility Maps¹⁷; therefore, any impacts are expected to be less than significant.				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. The applicant will meet any requirements requested by the Fire/OES Department. No impacts are expected.				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) According to the California Department of Forestry and Fire Protection "Fire and Resource Assessment Program Map" for Imperial County, the project site is not considered a fire hazard zone; therefore, no impacts are expected.				

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

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. The Heber Public Utility District (HPUD) offers both sewer and water services to the Imperial Center. Therefore, the project would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Any potential impacts are expected to be less than significant.				
b) Substantially decrease groundwater supplies or interfere	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

b) As previously stated on item (X)(a) above, the Heber Public Utility District (HPUD) offers both sewer and water services to the Imperial Center, therefore the proposed project is not anticipated to significantly reduce groundwater supplies or interfere with groundwater recharge in a way that would impede sustainable groundwater management of the basin. Therefore, any impacts are expected to be less than significant.

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

c) Since the proposed project is located in two existing buildings within the Imperial Center, it does not anticipate a physical alteration to the site, that would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course, stream, river or through the addition of impervious surfaces. Any impacts are expected to be less than significant.

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

(i) According to Imperial County General Plan's Seismic and Public Safety Element¹⁴, "Erosion Activity Map^{14b}," Figure 3, the proposed project site is not located within an area of substantial soil erosion or siltation on- or off-site. Therefore, any impacts are expected to be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

(ii) The proposed project is located within "Zone X" of flood map 06025C2100C not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite. As a result, any potential impacts are expected to be less than significant.

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

(iii) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility, and it does not anticipate creating or contributing runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, any potential impacts are expected to be less than significant.

(iv) impede or redirect flood flows?

(iv) The proposed project is not expected to impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center¹⁹, Flood Insurance Rate Map, the proposed project site is located within "Zone X" of flood map 06025C2100C with 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile, effective September 26, 2008. Therefore, compliance with ICDPW's standards regarding drainage would reduce any impacts to less than significant.

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

d) The proposed project will operate within existing buildings, therefore, impacts related to risk releasing pollutants due to project inundation are considered to be low. Additionally, as previously stated on item (X)(c)(iv) above, the proposed project site is located within "Zone X" of flood map 06025C2100C. No impacts are expected

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

e) The proposed project is located within the Imperial Center and is served by HPUD water and sewer services, which is not expected to conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan; therefore, any impacts are expected to be less than significant.

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XI. **LAND USE AND PLANNING** *Would the project:*

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|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community?
a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility; therefore, it does not anticipate physically dividing an established community. No land use or planning impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
b) The proposed project is located within the Imperial Center Specific Plan Area and its consistent with the intent of the County General Plan, and the County's Land Use Ordinance. The proposed project is zoned ICC-G-SPA (Imperial Center Commercial with Geothermal within a Specific Plan Area) and will not 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; less than significant impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

XII. **MINERAL RESOURCES** *Would the project:*

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 does not anticipate the removal of mineral resources and it is not located within the boundaries of an active mine per Imperial County General Plan's Conservation and Open Space Element⁶, "Existing Mineral Resources Map^{6a}" Figure 8. No impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?
b) The proposed project will not result in the loss of availability of locally important mineral resources recovery site delineated on a local general plan, specific plan or other land use plan. No impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. Therefore, no impacts are expected for the generation of substantial temporary or permanent ambient noise levels in the vicinity of the project. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels?
b) As noted in Section XIII(a), the proposed project will be located within two existing buildings, therefore, generation of excessive groundborne vibration and noise levels are not expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
c) The proposed project will be located within two existing buildings in the Imperial Center, and it is not within the vicinity of a private airstrip or an airport. No Impact is expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	---	-------------------------------------	----------------

- a) **The proposed project does not appear to induce substantial unplanned population growth in the area, as the project's objective is to better service the existing community, either directly or indirectly; therefore, no impact is expected.**
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
- b) **The proposed project is located within a Specific Plan Area for commercial purposes; therefore, it will not displace substantial numbers of exiting housing, necessitating the construction of replacement housing elsewhere; no impact is expected.**

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
- a) **The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility, and will not physically impact any local government facilities or require for a new or altered government facility for any possible required services for the proposed project; therefore, no impact is expected.**
- 1) Fire Protection?
- 1) **The proposed project is located within the existing Imperial Center in the Specific Plan Area. The Imperial County Fire Department provided a letter dated February 11, 2026²², stating that the project involves a change in occupancy from Group M (Mercantile) to Institutional Group I. Accordingly, the applicant must ensure the project includes buildings and structures used for 24-hour medical care for more than five persons who are not capable of self-preservation or are classified as nonambulatory or bedridden. The Fire Department also identified applicable California Fire Code requirements for I-2 occupancies in its comment letter; compliance with ICFD rules and regulations will reduce project impacts to a less-than-significant level.**
- 2) Police Protection?
- 2) **The proposed project will not have an impact on police protection. In case of emergency or as a back up to the Sheriff other law enforcement divisions do provide an "as needed" service. This includes the City of Calexico, and the Highway Patrol, etc. No impact is expected.**
- 3) Schools?
- 3) **The Imperial Center Specific Plan is located within the Heber School District, which provides elementary, middle and high school education for students in grades K-8. Central Union High School District in El Centro provides for 9-12 education. The project would not result in an increase in population or housing and would not require additional school services. No impact is expected.**
- 4) Parks?
- 4) **The proposed project will remain within commercial purposes and would not result in an increase in population or housing and would not increase demand for local parks. No impact is expected.**
- 5) Other Public Facilities?
- 5) **The project would not appear to put an increased burden on off-site public services, including existing fire, police, school and other governmental services. Therefore, no impact is expected.**

XVI. RECREATION

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- a) **The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional Housing facility. Subsequently, the proposed project would not increase the use of the existing neighborhood and regional parks or other recreational facilities; therefore, any impact is expected to be less than significant.**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- 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) As mentioned above in XVI a); the proposed project would not appear to include an expansion of recreational facilities; therefore, any impact is expected to be less than Significant.**

XVII. TRANSPORTATION *Would the project:*

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- a) The proposed project involves the adaptive reuse of two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area for operation as an Interim Recuperative Care and Transitional Housing facility. Site access will continue to be provided from Yourman Road, and adequate on-site parking is available. The applicant will comply with all applicable requirements of the Imperial Center circulation plan, land use ordinance, and transportation planning standards. Patients arriving at the NHHA facility will be transported directly via hospital transportation, private ride services, or an NHHA-operated van. Walk-ins and visitors will not be permitted on the premises. In addition, NHHA staff will provide transportation for residents to stores, pharmacies, or care providers as needed, with approximately 20 trips per week, typically transporting 4-5 clients at a time. Therefore, transportation-related impacts are expected to be less than significant.**
- b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?
- b) As stated in XVII (a) the proposed project will reutilize two existing buildings and it does not appear to impact any public transit, bicycle or pedestrian facility. Less than impacts are expected.**
- 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 project site is on a previously constructed site in the Imperial Center located in Heber, and it is compatible with the Imperial County General Plan Land Use Designation. The adaptation to the NHHA facility is not expected to increase hazards; therefore, no impact is expected.**
- d) Result in inadequate emergency access?
- d) All on-site traffic areas exist; no comment letters were received from Sheriff Department, and a comment letter from Fire Department was received on February 11, 2026, stating that the applicant shall comply with ICFD rules and regulations to not affect the existing emergency access. Less than significant impacts are expected.**

XVIII. TRIBAL CULTURAL RESOURCES

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:
- a) The project is not expected to cause a substantial adverse change in the significance of a tribal cultural resource since the project site has been previously disturbed and no impacts have been identified in the past. The proposed project involves indoor activities only and limited traffic; therefore, less than significant impacts are expected.**
- (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or
- (i) The project would not appear to cause an adverse change in the significance of a tribal cultural resource. The property site has previously been impacted by general commercial uses allowed in the current zone. AB 52 letters have been sent out to the Agua Caliente Tribe, Quechan Tribe and Campo Band of Mission Indians for consultations. The County received a "No comment" email from the Agua Caliente tribes on February 10, 2026, therefore, any impact is expected to be less than significant.**
- (ii) A resource determined by the lead agency, in its

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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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) No significant resources listed as defined in the Public Resources Code Section 5024.1 are expected; therefore, any impact is expected to be less than significant.

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | a) The proposed project site involves adapting two existing buildings, previously occupied by restaurants, within the Imperial Center Specific Plan Area to operate as an Interim Recuperative Care and Transitional, The Heber Public Utility District (HPUD) offers both sewer and water services to the Imperial Center. Therefore, no construction of a new or expanded water, wastewater treatment or stormwater drainage is being proposed, any impact is expected to be less than significant. | | | | |
| b) | Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | b) As mentioned above in XIX (a), the Heber Public Utility District (HPUD) offers both sewer and water services to the Imperial Center. Therefore, it will have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years and less than significant impacts are expected. | | | | |
| c) | Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | c) The proposed project results in a similar use as the commercial uses that were previously on the site and were serviced by the Heber Public Utility District. A will serve letter will be required prior to any building permits. Less than significant impacts are expected. | | | | |
| d) | Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | d) The proposed project does not expect to generate an excessive amount of waste for a commercial type of use. The applicant shall ensure that all waste is disposed of in accordance with State and local goals. Therefore, less than significant impacts are expected. | | | | |
| e) | Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | e) All proposed projects within the County shall contract with a licensed waste hauler for waste generated by the facility. Therefore, less than significant impacts are expected. | | | | |

XX. WILDFIRE

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

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) | Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | a) The proposed project is located within the existing Imperial Center in the Specific Plan Area. The Imperial County Fire Department provided a letter dated February 11, 2026²², stating that the project involves a change in occupancy from Group M (Mercantile) to Institutional Group I. Accordingly, the applicant must ensure the project includes buildings and structures used for 24-hour medical care for more than five persons who are not capable of self-preservation or are classified as nonambulatory or bedridden. The Fire Department also identified applicable California Fire Code requirements for I-2 | | | | |

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
occupancies in its comment letter; compliance with ICFD rules and regulations will reduce project impacts to a less-than-significant level.				
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) As noted in Item (XX)(a), the proposed project is located within the Imperial Center Specific Plan Area on previously disturbed land. The applicant will comply with all applicable Fire Department rules and regulations, and the project is not expected to increase wildfire risk. Therefore, impacts are anticipated to be less than significant.				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) The proposed project will utilize two existing buildings within the Imperial Center Specific Plan Area, that action does not appear to adversely affect either the existing operations on the property or impact infrastructure. Therefore, a less than significant impact is 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) The project is located on flat and moderately sloped terrain. The proposed project involves the use of two existing buildings within the Imperial Center Specific Plan Area, that action does not appear to adversely affect the existing drainage. Therefore, a less than significant impact is 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

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
- Rocio Yee, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Agricultural Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Quechan Indian Tribe
- Campo Band of Mission Indians Tribe
- Imperial Irrigation District (IID)

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

V. REFERENCES

1. Imperial County General Plan: Circulation and Scenic Highway Element; page 30
2. California State Scenic Highway System Map
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>
3. California Farmland Mapping & Monitoring Program: Imperial County Important Farmland Map 2018
<https://maps.conservation.ca.gov/DLRP/CIFF/>
4. Imperial County General Plan: Conservation and Open Space Element
 - a) Figure 1: Sensitive Habitat Map
 - b) Figure 2: Sensitive Species Map
 - c) Figure 5: Areas of Heighten Historic Period Sensitivity Map
 - d) Figure 6: Known Areas of Native American Cultural Sensitivity Map
 - e) Figure 8: Existing Mineral Resources Map
5. National Wetlands Inventory: Surface Waters and Wetlands Map
<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>
6. Quechan Indian Tribe comment email dated January 26, 2026
7. Agua Caliente Band of Cahuilla Indians email dated February 10, 2026.
8. California Geological Survey Hazard Program: Alquist-Priolo Fault Hazard Zones
<https://gis.data.ca.gov/maps/ee92a5f9f4ee4ec5aa731d3245ed9f53/explore?location=32.538703%2C-110.920388%2C6.00>
9. California Department of Conservation: Fault Activity Map
<https://maps.conservation.ca.gov/cgs/fam/>
10. United States Geological Survey's Quaternary Faults Map
<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>
11. California Tsunami Data Maps
<https://www.conservation.ca.gov/cgs/tsunami/maps>
12. Imperial County General Plan: Seismic and Public Safety Element
<https://www.icpds.com/assets/planning/seismic-and-public-safety.pdf>
 - a) Figure 2: Landslide Activity Map
 - b) Figure 3: Erosion Activity Map
13. California Department of Toxic Substances Control: EnviroStor
<https://www.envirostor.dtsc.ca.gov/public/>
14. Imperial County Airport Land Use Compatibility Maps
<https://www.icpds.com/planning/maps/airport-land-use-compatibility-maps>
15. Cal Fire: Fire Hazard Severity Zones Maps – Imperial County
https://osfm.fire.ca.gov/media/6680/fhszs_map13.pdf
16. Federal Emergency Management Agency (FEMA) Flood Map Service Center: Flood Insurance Rate Map
<https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor>
17. Imperial County General Plan: Noise Element
<https://www.icpds.com/assets/planning/noise-element-2015.pdf>
18. California Historic Resources: Imperial County
<https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13>
19. "County of Imperial General Plan EIR", prepared by Brian F. Mooney & Associates in 1993; and as Amended by County in 1996, 1998, 2001, 2003, 2006 & 2008, 2015, 2016.
20. Air Pollution Control District (APCD) comment letter received February 4, 2026.
21. Imperial County Fire Department (ICFD) comment letter received February 11, 2026.
22. Imperial County Executive Office (CEO) comment letter received February January 27, 2026.
23. Imperial County Agricultural Commissioner comment letter received February 9, 2026.
24. Imperial Center Specific Plan Area (ICSPA)

NEGATIVE DECLARATION – County of Imperial

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

Project Name: Conditional Use Permit (CUP) #26-0001 / Initial Study #26-0001
NHHA (National Healthcare & Housing Advisors)

Project Applicant: Duggins Construction Inc.
341 W. Crown Court,
Imperial CA. 92251

Applicant: Paul Leon, RN, BSN, PHN, FAAN
Chief Executive Officer
National Healthcare & Housing Advisors, LLC
1720 Termino Avenue, Long Beach, CA 90804

Project Location: 1131 & 1147 Yourman Rd.
Heber CA 92249
LOT 7 OF IMPERIAL CENTER SUB UN1 TR954 1.88AC &
LOT 8 OF IMPERIAL CENTER SUB UN1 TR954 2.05AC

Description of Project:

The applicant is requesting a Conditional Use Permit to operate an Interim Recuperative Care and Transitional Housing facility within the Imperial Center Specific Plan Area. NHHA's CalAIM (Care Continuum Leveraging California Advancing and Innovating Medi-Cal) program provides day habilitation, recuperative care, short-term post-hospitalization services, community health worker services, a sobering center, enhanced care management, behavioral health services, and street medicine. The ultimate goal of the Care Continuum is to secure permanent housing and long-term housing stability for each client. Housing services may be extended for an additional six (6) months after the initial 90-day recuperative care period has expired. The facility will provide services for approximately 80–100 clients and will employ up to 50 team members hired locally. The hours of operation for the site will be 24 hours a day, Monday through Sunday.

VI. 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 **NEGATIVE DECLARATION** will be prepared.

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

NOTICE

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

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

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

Applicant Signature

Date

SECTION 4

VIII. RESPONSE TO COMMENTS

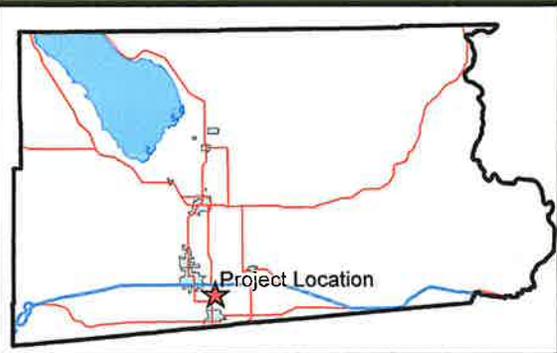
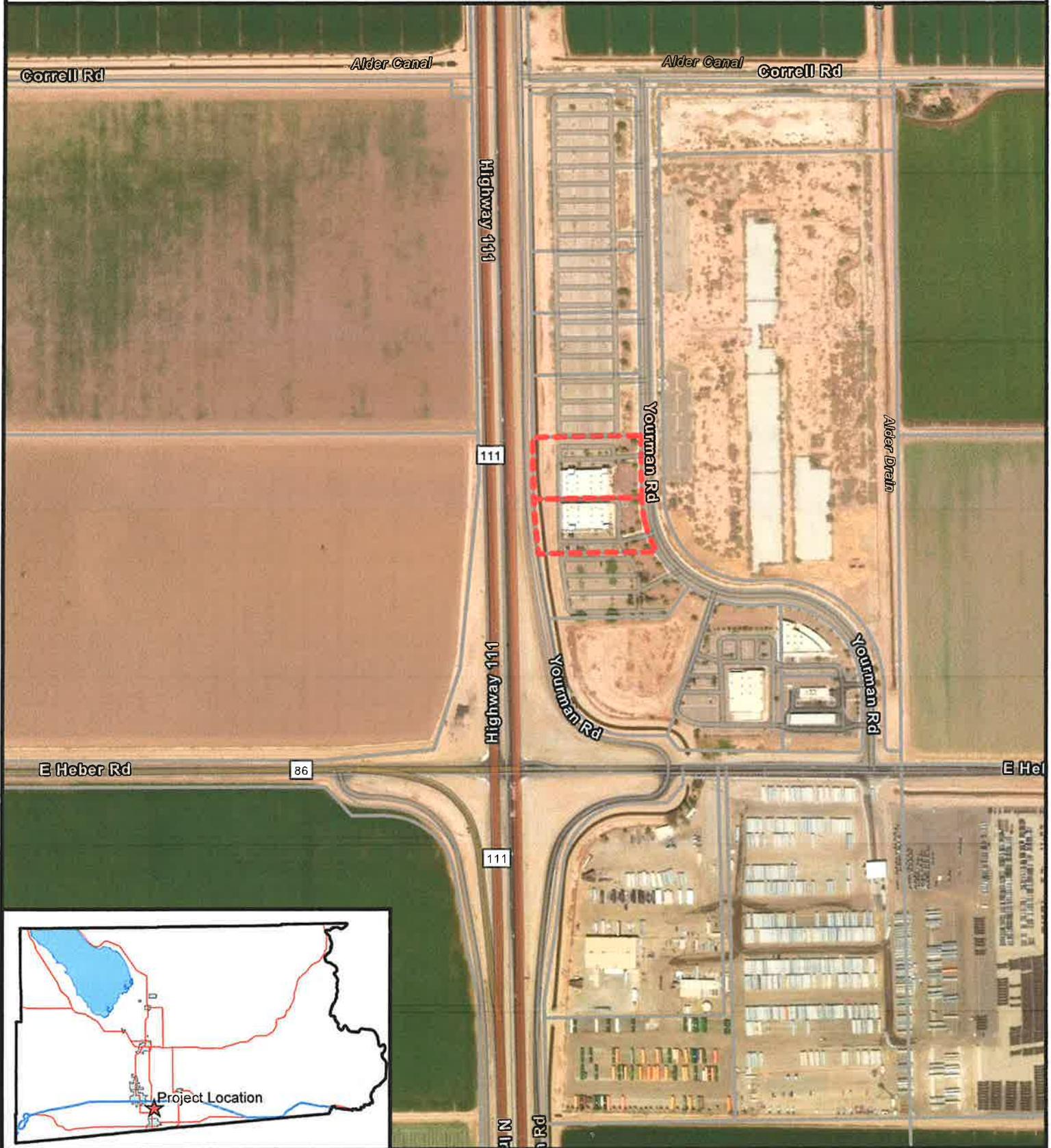
(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

VICINITY MAP

PROJECT LOCATION MAP



**NHHA'S CALAIM
NATIONAL HEALTHCARE HOUSING
ADVISORS (NHHA)
CUP #26-0001 / IS #26-0001
APN 054-680-007 & 054-680-008**

-  Project Location
-  Parcels
-  Centerline



COMMENT LETTERS

ADMINISTRATION / TRAINING

1078 Dogwood Road
Heber, CA 92249

Administration

Phone: (442) 265-6000
Fax: (760) 482-2427

Training

Phone: (442) 265-6011



OPERATIONS/PREVENTION

2514 La Brucherie Road
Imperial, CA 92251

Operations

Phone: (442) 265-3000
Fax: (760) 355-1482

Prevention

Phone: (442) 265-3020

February 11, 2026

RECEIVED

By Imperial County Planning & Development Services at 8:42 am, Feb 12, 2026

RE: NHHA Recuperative Care

CUP 26-0001

1131 & 1147 Yourman Rd, Heber CA 92249

APN: 054-680-007 & 054-680-008

Imperial County Fire Department Fire Prevention Bureau would like to thank you for the opportunity to review and comment on CUP 26-0001 for NHHA Recuperative Care Facility located at 1131 & 1147 Yourman Rd, Heber CA 92249.

The project description is a change of occupancy from a Group M Mercantile to an Institutional Group I occupancy. This will be approximately 80-100 clients recuperative care facilities with 24-hour care up to 90 days to provide day habilitation, recuperative care, short-term post-hospitalization services, community health worker services, a sobering center, enhanced care management, behavioral health services, and street medicine. The ultimate goal of the Care Continuum is to secure permanent housing and long-term housing stability for each client.

Institutional Group I-2. Institutional Group I-2 occupancy shall include buildings and structures used for medical care on a 24-hour basis for more than five persons who are not capable of self-preservation or classified as nonambulatory or bedridden. This group shall include, but not be limited to, the following:

Detoxification facilities

Hospitals

Nursing homes

Psychiatric hospitals

Fire Department requirements based on the California Fire Code for I-2 occupancies:

Chapter 4 of the California Fire Code

- CFC Section 403.7.2 Group I-2 Occupancy
- CFC Section 403.7.2.1 Fire Safety and Evacuation Plan
- CFC Section 403.7.2.2 Fire Safety Plan
- CFC Section 403.7.2.3 Staff Training
- CFC Section 403.7.2.4 Emergency Evacuation Drills
- CFC Section 405 Emergency Evacuation Drills

Chapter 5 of the California Fire Code

- CFC Section 501.3.1 Site Safety Plan
- CFC Section 506.2 Key Box Maintenance

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

ADMINISTRATION / TRAINING

1078 Dogwood Road
Heber, CA 92249

Administration

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Fax: (760) 482-2427

Training

Phone: (442) 265-6011

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Chapter 8 of the California Fire Code

- CFC Section 803 Interior Wall and Ceiling Finish in Existing Buildings
- CFC Section 803.1 General
- CFC Section 803.3 and Table 803.3 Interior Finish Requirements Based on Occupancy
- CFC Section 804.3.3.3 Group I-2 and Group I-3 Floor Surfaces
- CFC Section 805 Upholstered Furniture and Mattresses in New and Existing Buildings
- CFC Section 805.2 Group I-2 and Group B Ambulatory Care Facilities 805.2.1 through 805.2.2
- CFC 807.2 Combustible Decorative Materials
- CFC 807.5.3 Group I-2, I-2.1 and R-2.1
- CFC 807.5.3.3 in Group I-2, I-2.1 and R-2.1
- CFC 808.1 Wastebaskets and Linen Containers in Group I-2 and I-3 Occupancies and Group B Ambulatory Care Facilities

Chapter 9 of the California Fire Code

- CFC 901.6 Inspection, Testing, Maintenance
- CFC 901.6.2.2 Smoke Control Systems
- CFC 901.6.3 Records
- CFC 903.2.6 Group I
- CFC 903.2.6.1 Group I-2
- CFC 906.1
- CFC 909.16 Fire Fighter's Smoke Control Panel
- CFC 909.16.1 Smoke Control Systems
- CFC 909.16.2 Smoke Control Panel
- CFC 907.2.6 Group I Fire Alarm
- CFC 907.2.6.2 Group I-2 and Group I-2.1
- CFC 907.2.6.2.2 Automatic Fire Detection
- CFC 907.3.2.5 Controlled Egress Doors for Group I-2 Occupancies
- CFC 907.5.2.5 Group I-2 and I-2.1
- CFC 909 Smoke Control Systems
- CFC 909.5.3.1 Group I-2, I-2.1, R-2.1 and Ambulatory Care Facilities

Chapter 10 of the California Fire Code

- CFC1006.2.1 Egress Based on Occupant Load and Common Path of Egress Travel Distance
- CFC Table 1006.2.1
- CFC 1008 Means of Egress Illumination

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

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Prevention

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- CFC 1010.1.1 Size of Doors
- CFC 1010.2.9 Panic and Fire Exit Hardware
- CFC 1010.2.14 Controlled Egress Doors in Group I-2
- CFC 1020.2 Construction
- CFC table 1020.2
- CFC 1025.5 Dead Ends

Chapter 12 of the California Fire Code

- CFC 1203.2.8 Group I-2 Occupancies
- CFC 1203.4.1 Group I-2 and Ambulatory Care Facilities

Other sections and subsections of the California Fire Code and Building Code may apply to the project.

Again, thank you for the opportunity to comment. Imperial County Fire Department reserves the right to comment and request additional requirements pertaining to this project regarding fire and life safety measures, California building and fire code, and National Fire Protection Association standards at a later time as we see necessary.

If you have any questions, please contact the Imperial County Fire Prevention Division at 442-265-3020 or 442-265-3021.

Sincerely

Andrew Loper *Andrew Loper*
Deputy Fire Marshal
Imperial County Fire Department
Fire Prevention Division

CC: David Lantzer Fire Chief
Imperial County Fire Department

Aimee Trujillo

From: Rocio Yee
Sent: Tuesday, February 10, 2026 11:18 AM
To: Valerie Grijalva; Adriana Ceballos; Diana Robinson; Michael Abraham
Cc: Aimee Trujillo; Olivia Lopez; Kayla Henderson; Vanessa DeLaTeja; Nicole Atondo
Subject: FW: CUP26-00001

Good morning, Valerie,

Please see below comment from Aguacaliente tribe regarding CUP26-0001.
Could you please process as a comment and send it to the applicant?

Thank you,



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

RECEIVED

FEB 10 2026

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

From: Sanchez-Aguilar, Jocel (TRBL) <jsanchez-aguilar@aguacaliente.net>
Sent: Tuesday, February 10, 2026 11:02 AM
To: Rocio Yee <rocioyee@co.imperial.ca.us>
Cc: THPO Consulting <ACBCI-THPO@aguacaliente.net>
Subject: CUP26-00001

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

Greetings,

A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Thank you,



Jocel Sanchez-Aguilar
Cultural Resources Analyst
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive,
Palm Springs, CA 92264
E: jsanchez-aguilar@aguacaliente.net
C: (760) 902-0315 | D: (760) 883-1137

Aimee Trujillo

From: Carlos Yee
Sent: Monday, February 9, 2026 11:49 AM
To: Planning - ICPDSCCommentLetters
Cc: Rocio Yee
Subject: RE: CUP26-0001/IS26-0001 - Request for Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning,

Our Department has no comments on the above mentioned project.

Regards.

Carlos Yee | Permit Specialist
ICDPW - Engineering Division | 155 S. 11th Street. El Centro, CA 92243
Phone: (442)265-1818 x1838 | Fax: (442)265-1858 | Email: CarlosYee@co.imperial.ca.us

RECEIVED

FEB 09 2026

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Monday, January 26, 2026 11:04 AM
To: Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <SheilaVasquezBazua@co.imperial.ca.us>; David Lantzer <davidlantzer@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Claudia Valadez <Claudia.Valadez@co.imperial.ca.us>; Veronica Atondo <VeronicaAtondo@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; Carlos Yee <CarlosYee@co.imperial.ca.us>; rkelley@icso.org; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; iidenvironmental@iid.com; jjbrooks@iid.com; JFLopez@iid.com; kimberly.dodson@dot.ca.gov; roger.sanchez-rangel@dot.ca.gov; marcuscuero@campo-nsn.gov; dtosie@campo-nsn.gov; tribalsecretary@quechantribe.com; historicpreservation@quechantribe.com; mdessert@heber.ca.gov
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Rocio Yee <rocioyee@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Azucena Gallardo <azucenagallardo@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Nicole Atondo <nicoleatondo@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>; Vanessa DeLaTeja <vanessadelateja@co.imperial.ca.us>
Subject: CUP26-0001/IS26-0001 - Request for Comments

Good morning,

Please see attached Request for Comments packet for **CUP26-0001/IS26-0001** 1131& 1147 Yourman Rd. Heber CA 92249

Comments are due by **February 10th, 2026, at 5:00PM.**



Office of the Agricultural Commissioner
Sealer of Weights and Measures
852 Broadway, El Centro CA 92243

Jolene Dessert
Commissioner / Sealer

Rachel Garewal
Asst. Commissioner / Sealer

February 9, 2026

Rocio Yee, Planner II
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

RECEIVED

By Imperial County Planning & Development Services at 1:25 pm, Feb 09, 2026

Re: Conditional Use Permit #26-0001

Dear Ms. Yee,

Our department has reviewed the documents pertaining to Conditional Use Permit #26-0001 for applicant Mike Nahass who proposes an interim recuperative care and transitional housing facility within the Imperial Center Specific Plan area at 1131 and 1147 Yourman Road, Heber, CA.

Regarding landscaping requirements for the facility, our office asks that if plant material is not sourced from a nursery within Imperial County, the applicant must follow the requirements for movement of plant material into Imperial County from other counties or from out of state. The applicant can contact our Pest Detection and Eradication Division for any questions regarding the quarantines of movement of plant material, as there are several quarantines that must be observed.

Please see the attachment for more information regarding landscaping plant source requirements.

Sincerely,

Jolene Dessert



Office of the Agricultural Commissioner
Sealer of Weights and Measures
852 Broadway, El Centro CA 92243

Jolene Dessert
Commissioner / Sealer

Rachel Garewal
Asst. Commissioner / Sealer

March 15, 2025

To Landscapers, Nurseries, Retailers, Homeowners, and Planning Departments:

This letter is to remind you of the legal requirements you must follow for transporting plants and plant materials into Imperial County. There are numerous quarantines in place to safeguard landscape plants, the agricultural industry of Imperial County, and the whole of California from exotic pests and diseases. Please see the attached "Summary of Shipment Requirements and Quarantines," for information on quarantines that most commonly affect Imperial County.

All plants coming into Imperial County are required by law to be held for inspection by the Agricultural Commissioner prior to planting or being made available for sale. This applies to plants brought in by any party, including commercial businesses and homeowners. It is very important that our office is notified immediately upon arrival of any plant shipment. You must not commingle incoming shipments with other plants until after they are inspected and released by our office.

Call our office as early as possible to schedule an inspection. Inspectors are usually available Monday through Friday, 8:00 a.m. to 4:00 p.m. If you intend to bring a shipment in on a weekend or County holiday, please call ahead to see if an inspector will be available.

If you have any questions or concerns, our office is here to help. Please call us at (442) 265-1500.

Sincerely,

Nelson Perez
Deputy Agricultural Commissioner
Pest Detection and Eradication

Summary of Shipment Requirements and Quarantines

- All nursery stock must be accompanied by valid proof of ownership.
- Nursery stock shipments may be released by phone at the discretion of the Agricultural Commissioner.
- Landscapers and other entities that have a growing ground or holding yard where nursery stock is held prior to delivery to the planting site must be licensed as a nursery.

Pierce's Disease and the Glassy-winged Sharpshooter

The Pierce's Disease Control Program (PDCP) exists in California to prevent the artificial movement and spread of the glassy-winged sharpshooter (GWSS), a vector of Pierce's Disease. Pierce's Disease is caused by the bacterium *Xylella fastidiosa*. It is deadly to many plant species, and its vector, GWSS, has an extensive list of hosts including many agricultural crops and landscape plants. Imperial County is the only Southern California County not infested with GWSS.

It is unlawful to bring plants into Imperial County from inside the GWSS-infested area; however, nurseries located within the infested area may do so under a compliance agreement from their county's Agricultural Commissioner. It is lawful to bring plants in from a nursery within the infested area so long as they meet the terms of their compliance agreement. These terms include (but are not limited to):

- Notify the Imperial County Agricultural Commissioner (CAC) at least 24 hours prior to shipment.
- Shipment paperwork is stamped with a GWSS compliance agreement number.
- Shipment is accompanied by a "Blue Tag" shipping permit stating "Warning – Hold for Inspection".
- Shipment is accompanied by a valid Certificate of Quarantine Compliance (CQC), if applicable.

For additional information regarding the PDCP or GWSS, please visit <https://www.cdfa.ca.gov/pdcp/>.

Other Plants with Quarantine Restrictions

- All **citrus species** from other California counties and other states.
- All **palms of the Phoenix genus**, including Pygmy Date Palms (*P. roebelenii*), except when originating from certain areas of Riverside County.
- Nursery stock originating in **Florida** (specifically Burrowing and Reniform Nematode [3 CCR § 3271] and Imported Fire Ant [7 CFR § 301.81]).
- Nursery stock originating in **Arizona** (specifically Ozonium Root Rot [3 CCR § 3261]).
- All **lettuce plants** are prohibited unless tested for Lettuce Mosaic Virus.
- All plants shipped *from* Imperial County must be certified free from Ozonium Root Rot by the CAC.

Penalties for Failure to Comply with Requirements (California Food and Agricultural Code [FAC])

Any violation of quarantine requirements is an infraction punishable by a fine of one thousand dollars (\$1,000) for the first offense. Second and subsequent offenses within three years are punishable as misdemeanors. (FAC § 5309)

In addition to any other penalties, any person violating quarantine requirements may be liable civilly in an amount not exceeding ten thousand dollars (\$10,000) for each violation. (FAC § 5310)

In lieu of civil action, the Agricultural Commissioner (CAC) may levy a civil penalty of up to two thousand five hundred dollars (\$2,500) for each violation. (FAC § 5311)

Anyone who negligently or intentionally violates any state or federal law or regulation by importing any plant or other article infested by pest or disease and causes an infestation or causes the spread of an existing infestation beyond quarantine boundaries is liable civilly up to twenty-five thousand dollars (\$25,000) for each act that constitutes a violation. (FAC § 5028)

AIR POLLUTION CONTROL DISTRICT



February 4, 2026

RECEIVED

By Imperial County Planning & Development Services at 1:27 pm, Feb 04, 2026

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

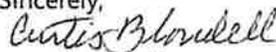
SUBJECT: Conditional Use Permit 26-0001 and Initial Study 26-0001 – Imperial Heber Center, LLC

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review and comment on the application for Conditional Use Permit 26-0001 and Initial Study 26-0001 that would allow the operation of an Interim Recuperative Care and Transitional Housing facility (project) within the Imperial Center Specific Plan Area at 1131 and 1147 Yourman Road in Heber, also identified as Assessor's Parcel Number 054-680-007 and 054-680-008.

The Air District commented on a Similarity of Use (SOU) determination for this project on December 4, 2025. While the Air District had no comment on the SOU determination at that time, we will reiterate our previous comments on the project itself. The project **must adhere to all Air District rules and regulations**. A **Construction Notification Form** must be filed with the Air District no less than 10 days prior to the start of construction.

Air District rules and regulations and forms, along with our California Environmental Quality Act Handbook, can be found on our website at <https://apcd.imperialcounty.org> by accessing the Planning drop-down menu. The Air District can be contacted at (442) 265-1800.

Sincerely,

Curtis Blondell
APC Environmental Coordinator

Reviewed by,

Monica N. Soucier
APC Division Manager

COUNTY EXECUTIVE OFFICE

Dr. Kathleen Lang
County Executive Officer
kathleenlang@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

January 27, 2026

JAN 27 2026

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

TO: Rocio Yee, Planning and Development Services Department
FROM: Rosa Lopez-Solis, Executive Office 
SUBJECT: Comments – Imperial Center Heber, LLC Project, CUP 26-0001/APN 054-680-007 and 054-680-008-000

The County of Imperial Executive Office is providing comments on the Imperial Center Heber, LLC Project, CUP 26-0001/APN 054-680-007 and 054-680-008-000. The Executive Office would like to inform the developer of the conditions and responsibilities that will apply if the applicant seeks approval of a Interim Recuperative Care and Transition Housing facility. Prior to the issuance of any grading permit the following shall be completed and submitted:

- **Sales Tax Guarantee.** The permittee is required to have a Construction Site Permit reflecting the project site address, allowing all eligible sales tax payments for the purchase of materials 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.
- At developers cost, the County Executive Office shall hire a third-party consultant to produce a Fiscal and Economic Impact Analysis & Job and Employment Analysis (FEIA & JEIA). Report shall be completed prior to project being placed on Planning Commission meeting

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

APPLICATION

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

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

1. PROPERTY OWNER'S NAME Imperial Center Heber, LLC/ Mike Nahass	EMAIL ADDRESS	
2. MAILING ADDRESS (Street / P O Box, City, State) 23 Corporate Drive, Suite 150. Newport Beach, CA	ZIP CODE 92660	PHONE NUMBER
3. APPLICANT'S NAME NHHA Community Care Campus, Imperial Valley, LLC	EMAIL ADDRESS permits@nhhadvisors.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 1720 Termino Avenue, Long Beach, CA.	ZIP CODE 90804	PHONE NUMBER
4. ENGINEER'S NAME	CA. LICENSE NO.	EMAIL ADDRESS
5. MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER
6. ASSESSOR'S PARCEL NO. 054-680-007 & 054-680-008	SIZE OF PROPERTY (in acres or square foot) 1.88 AC & 2.05 AC	ZONING (existing) ICC-G-SPA
7. PROPERTY (site) ADDRESS 1131 Yourman Rd., Heber CA 92249 & 1147 Yourman Rd., Heber CA 92249		
8. GENERAL LOCATION (i.e. city, town, cross street)		
9. LEGAL DESCRIPTION LOT 7 OF IMPERIAL CENTER SUB UN1 TR954 1.88AC & LOT 8 OF IMPERIAL CENTER SUB UN1 TR954 2.05AC		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	_____
11. DESCRIBE CURRENT USE OF PROPERTY	<u>Vacant retail buildings with existing office on one suite</u>
12. DESCRIBE PROPOSED SEWER SYSTEM	<u>Heber sewer district</u>
13. DESCRIBE PROPOSED WATER SYSTEM	<u>Heber water district</u>
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	<u>Fire sprinklers</u>
15. IS PROPOSED USE A BUSINESS? <input type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE?

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

Paul Leon 1/5/2025
 Print Name Date
 Signature

 Print Name Date
 Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

APPLICATION RECEIVED BY: <u>py</u>	DATE <u>1/07/26</u>	REVIEW / APPROVAL BY OTHER DEPT'S required
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	<input type="checkbox"/> P. W.
APPLICATION REJECTED BY: _____	DATE _____	<input type="checkbox"/> E H S.
TENTATIVE HEARING BY: _____	DATE _____	<input type="checkbox"/> A. P. C. D.
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	<input type="checkbox"/> O E S.
		<input type="checkbox"/> _____
		<input type="checkbox"/> _____

CUP #
26-0001

IS#26-0001



Date: January 15, 2026

From: Community Care Campus, Imperial Valley, LLC managed by National Healthcare and Housing Advisors, LLC

To: The County of Imperial Valley

The Letter of Intent is being provided to the County of Imperial Valley (the "County") to deliver a detailed description of NHHA's street to home continuum of care and how NHHA can assist the county with its efforts to address homelessness and provide more permanent housing solutions. NHHA owns and operates a street to home continuum of care model of services ("Care Continuum") that focuses on providing housing and healthcare solutions for the most vulnerable populations in both rural and urban areas. NHHA is driven to provide these populations with excellence and dedication in identifying innovative solutions that are sustainable. NHHA's Care Continuum Leveraging California Medi-Cal's California Advancing and Innovating Medi-Cal ("CalAIM") program, NHHA (itself or through one of its nonprofit partners) provides all available community support services to its clients in the NHHA Care Continuum, including housing navigation and housing tenancy services, day habilitation, recuperative care, short term post hospitalization, community health worker services, sobering center, enhanced care management, behavioral health services and street medicine. Irrespective of how a client enters NHHA's Care Continuum or what services a client is utilizing, the ultimate goal of the Care Continuum is to procure permanent housing and housing stability for each client. Each client referred to one of NHHA's recuperative care centers will be offered short term post hospitalization services, which extends clients' housing services for an additional six (6) months after the 90-day recuperative care services expire. As part of CalAIM, any individual exiting recuperative care services has the one-time option to utilize secured housing for a period of six (6) months and this housing is funded by CalAIM. Therefore, clients in NHHA's Care Continuum may have secured housing for a period up to nine (9) months. Throughout each client's stay in NHHA's recuperative care center and/or short-term post hospitalization program, NHHA is working diligently to obtain transitional or more permanent housing for that client. NHHA partners with housing transition navigation and housing tenancy and sustaining specialists to assist NHHA clients with all aspects of acquiring housing and developing a housing support plan.



NHHA will also train and educate clients on financial literacy, as well as work with clients to address behaviors or habits that may jeopardize their housing sustainability. NHHA also leverages its nonprofit partners to assist its Care Continuum clients with housing security deposits, utility set-up fees, first and last month's rent and medically necessary housing items. NHHA will also work to reconnect clients with family members or obtain the necessary documentation to allow the client to begin the application process for housing. NHHA welcomes the opportunity to assist the clients in the Imperial Valley Continuum of Care Council with their housing navigation and housing tenancy needs or provide any additional assistance to ensure that the county meets its housing needs.

NHHA has secured a commercial properties located at 1131 Yourman Road Heber, CA 92249 & 1147 Yourman Road Heber, CA 92249, to provide recuperative care & short term post hospitalization services for 80-100 clients and up to 50 team members hired locally, supporting the day-to-day operations. Our team is equipped to provide wrap around services for our clients and consists of; Leadership team such as Director of Recuperative Care, Site Manager, Manager of Medical Coordination, a security team heavily trained to deescalate, council and stabilize, a medical team providing medical oversight, client support team providing day-to-day oversight, meals and transportation services to our clients on and off grounds, a housing team for housing services and resources, a case management team for additional resources. The hours of operation for this site would be Monday through Sunday, 24hrs a day. An existing similar use would be our recuperative care program operated by one of our nonprofit partners in our Community Care Campus, Long Beach located at 1720 Termino Ave, Long Beach, CA 90804. There are no state required licenses specific to the use requested. It is the intent of NHHA to secure that entire commercial lot and provide recuperative care services as soon as such services are approved by the county. As you know, the location of this commercial building is zoned for commercial/mix purposes, which meets our needs since we will be providing the business services of recuperative care and short-term post hospitalization. Furthermore, NHHA is diligently working to procure apartments, duplexes, triplexes and other housing options for transitional and permanent housing within the county. NHHA welcomes the opportunity to



provide supportive services to the residents of the county located in the navigation centers, encampments, parks and any other area where homeless residents are congregated. With our knowledge, expertise and experience, we can assist the county with quickly assessing the extent of the need, coordinating recuperative care services and assisting the existing social services centers with procuring transitional or permanent supportive housing.

NHHA is committed to working with the county in all avenues necessary to address homelessness and the housing needs in the county. As such, NHHA's priority will be to hire community members within the county. Additionally, NHHA will engage with local vendors in our endeavors to be an active community partner while providing our services to the most vulnerable population in the County. There are ample opportunities for the citizens of the county to volunteer, engage with our clientele and assist with creating greater opportunities and permanent housing for this vulnerable population. For example, one of the CalAIM services offered in NHHA's Care Continuum is day habilitation services, which basically teaches our clients all different life skills. NHHA appreciates the opportunity to work with members of the county who would like to lead or be part of numerous different life skills training classes. Finally, as part of NHHA's Care Continuum, NHHA coordinates work skill and workforce opportunities for our clients. It is our intent to be an active employer, as well as partner, to the County of Imperial Valley. NHHA can provide a detailed economic development and community engagement plan per your request. The plan will outline positions, wages and other details requested by the county if needed.

A handwritten signature in black ink, appearing to read 'Paul Leon', is written over a horizontal line.

Paul Leon, RN, BSN, PHN, FAAN
Chief Executive Officer
National Healthcare & Housing Advisors, LLC



December 28, 2025

County of Imperial Planning Department
 801 Main Street
 El Centro, CA 92243
 Attn: Jim Minick

Property Address:

1131 Yourman Road, Heber, CA 92249 (APN #054-680-007)
 1147 Yourman Road Suite A, Heber, CA 92249 (APN #054-680-008)

Subject: Conditional Use Permit Application

Conditional Use Permit Application

We believe that our planned use of Interim Housing and Wraparound supports Program is similar to the Hotel use as listed in the Imperial Center Specific Plan under allowed uses for commercial zones because of the similarities. The wraparound support includes light case management, services coordination, 24/7 on-site staffing, staff oversight of clients’ self-directed medical regimen to ensure recovery from illness or injury while experiencing homelessness. Furthermore, the State Department of Healthcare Services categorizes Recuperative Care as unlicensed temporary room and board.

This short-term, structured, service-enriched lodging program—designed to stabilize individuals exiting hospitals or shelters and move them into permanent housing—operates at the **functional intersection of a hotel and transitional housing**, delivering impacts, services, and outcomes already anticipated and approved under the Plan.

Why This Program Is Substantially Similar to “Hotel” and “Transitional Housing”

Criterion	Our Program	Hotel / Transitional Housing
1. Short-Term, Non-Permanent Stays	Average 30–90 days; goal is exit to permanent housing	Hotels: transient lodging; Transitional Housing: 30–180 days max
2. 24/7 On-Site Staffing	Trained staff 24/7 for safety, support, and coordination including Safety & Stabilization Counselors cross-trained to also provide security 24/7	Hotels: front desk, security; Transitional: Site manager, security
3. Structured Daily Meals	3 nutritious meals/day in common dining	Hotels: complimentary breakfast, room service; Transitional: shared kitchen/dining



4. Sleeping Room	Individual beds and personal storage, Wi-Fi	Hotels: guest rooms; Transitional: dorm-style or apartment units
5. Housekeeping & Linen Service	Daily deep cleaning, fresh linens	Standard hotel operations
6. Concierge-Style Support	Case managers assist with medical follow-ups, housing applications, transportation, life skills	Hotels: concierge; Transitional: case management required
7. Medical Coordination (Non-Clinical)	Medication education, appointment scheduling, transport to clinics	Hotels often arrange doctor visits; Transitional links to health services
8. Goal: Stability & Exit	Goal is for clients graduate to housing or a higher level of care	Transitional housing mandate; hotels facilitate onward travel
9. Traffic & Parking	< 50 daily trips (staff + transport); 1 space per 2 beds + 3 staff	Well within hotel trip-generation tables (ITE)
10. No Clinical Treatment	Zero medical procedures, no licensing, no Title 22	Neither hotels nor transitional housing provide treatment

Public Benefit & Community Alignment

This program is **not a medical facility**—it is **recovery-focused transitional lodging** that:

- Prevents hospital readmissions
- Reduces shelter bed demand
- Ends chronic street homelessness for participants
- (Operates with less intensity than a hotel (fewer peak trips, most clients do not have vehicles, no bar/lounge, no events))

It directly advances **Imperial County General Plan** goals:

- **Housing Element:** Increase transitional & supportive housing supply
- **Health & Human Services:** Bridge healthcare and housing
- **Economic Development:** Reuse vacant commercial buildings for community benefit

Operational Safeguards (Same as Hotel/Transitional Use)

We commit to all standard conditions applied to hotels and transitional facilities:

- Professional management plan (24/7 staffing roster)
- Good Neighbor Agreement with local businesses
- Secured entry, camera monitoring, fire/life-safety compliance
- Quarterly reporting: length of stay, housing outcomes, incident log
- No walk-ins; intake only via hospital/shelter referral



Conclusion

Our **Interim Recuperative Care & Transitional Housing Program** is **functionally indistinguishable** from an **extended-stay hotel with embedded social services**—a use already contemplated in the Specific Plan. It delivers **transitional housing outcomes** using **hotel-style operations**, all while imposing **fewer impacts** than either. We therefore request a **Conditional Use Permit**.



Terry Campbell, COO of NHHA
December 28, 2025



Wednesday, November 26, 2025

Dear Imperial Valley Planning Commission,

National Healthcare and Housing Advisors, LLC (“NHHA”) hereby authorizes **Duggins Construction Inc.** to act as our designated representative for matters related to: Community Care Campus, Imperial Valley Project located 1131 & 1147 Yourman Rd Heber, CA 92249

Duggins Construction Inc. is authorized to represent NHHA solely for purposes associated with the Imperial Valley Project listed above. This authorization may be modified or revoked at NHHA’s discretion with written notice.

We understand and appreciate the importance of adhering to all County of Imperial Valley guidelines and requirements. We are prepared to provide any necessary documentation and pay any associated fees promptly to facilitate the prompt establishment of the requested.

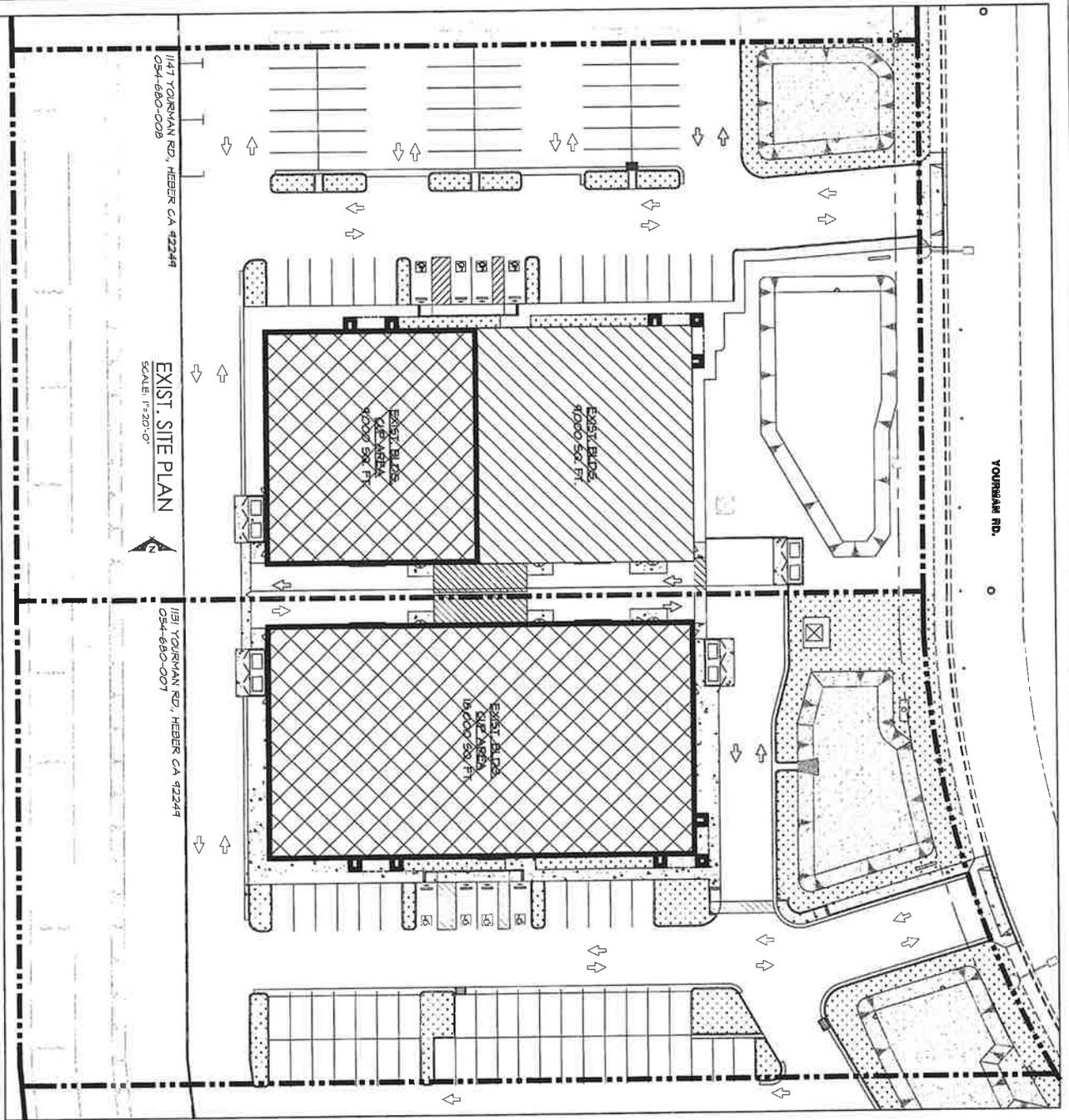
If you require additional verification or have any questions, please contact me directly at 714-361-0014 or ygurrola@nhhadvisors.com. Thank you.

Sincerely,

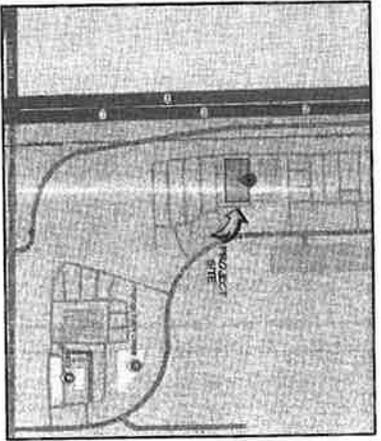
Paul Leon, RN, BSN, PHN, FAAN

Chief Executive Officer

National Healthcare & Housing Advisors, LLC



YOUNGMAN RD.



VICINITY MAP

PROJECT DATA #1

PROJECT OWNER:
 METRAL CENTER HEBER, LLC
 23 CONROSAVE DRIVE, SUITE 100
 NORTH BEACH, CA 92860
 ARCHITECT:
 1700 TERNING AVE
 LONG BEACH, CA 90804
 PROJECT MANAGER:
 HEBER, CA 92244
 054-650-008
 EXIST. ZONING:
 COMMERCIAL (C62)
 PROJECT DESCRIPTION:
 CONTRACTOR:
 DUGGINS CONSTRUCTION, INC.
 PERMAL, CA 92281

PROJECT DATA #2

PROJECT OWNER:
 METRAL CENTER HEBER, LLC
 23 CONROSAVE DRIVE, SUITE 100
 NORTH BEACH, CA 92860
 ARCHITECT:
 1700 TERNING AVE
 LONG BEACH, CA 90804
 PROJECT MANAGER:
 HEBER, CA 92244
 054-650-008
 EXIST. ZONING:
 COMMERCIAL (C62)
 PROJECT DESCRIPTION:
 CONTRACTOR:
 DUGGINS CONSTRUCTION, INC.
 PERMAL, CA 92281

PROJECT: **MMA SHAR USE PROCESS**
 1147 YOUNGMAN RD., HEBER CA 92244
 SCALE: AS SHOWN
 DATE: 11/10/2025
 SHEET CONTENTS:
 SITE PLAN

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