



Jim Minnick  
DIRECTOR

## Imperial County Planning & Development Services Planning / Building

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TO: Chairman Mike Goodsell  
Vice-Chairman Sandy Carver  
Commissioner Charles Lucas  
Commissioner Dennis Logue

FROM: Jim Minnick, Secretary  
Airport Land Use Commission

SUBJECT: Public Hearing to consider the proposed All American Grain LLC  
General Plan Amendment (GPA 18-0001) project for consistency  
with the 1996 Airport Land Use Compatibility Plan (**ALUC 01-19**)

DATE OF REPORT: February 5, 2019

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AGENDA ITEM NO: 1

HEARING DATE: March 20, 2019

HEARING TIME: 6:00 p.m.

HEARING LOCATION: County Administrative Center  
Board of Supervisors Chambers  
940 Main Street  
El Centro, CA 92243

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### SECRETARY'S RECOMMENDATION

It is staff's recommendation that the attached proposed project(s) for the proposed All American Grain LLC General Plan Amendment (GPA # 18-0001) which is outside of any County Airport Land Use Compatibility zone could be deemed consistent with the 1996 Imperial County Airport Land Use Compatibility Plan (ALUCP).

## SECRETARY'S REPORT

### Project Location:

The project including the General Plan Amendment & zone change is located on approx. 89+ acres just south of the City of Calipatria along Yocum Road and Albright Road between the Union Pacific Railroad tracks and Highway 111. The proposed zone change is for the western portion of parcel currently zoned A-2 General Agriculture.

The location of the proposed project is not found within any Imperial County Airport Compatibility Map, in the Zone, of the 1996 Airport Land Use Compatibility Plan.

### Project Description:

All-American Grain, LLC (applicant) proposes a Zone Change (ZC) and General Plan Amendment (GPA) to the west half of APN: 024-260-032 in an effort to bring the parcel into conformance with applicable zoning & land use regulations. The Zone Change & General Plan Amendment will allow more acreage under the Medium Industrial use so that the applicant may establish and expand a container yard, an additional inner rail-spur and a bridge allowing for alternative access.

The entire APN 024-260-032 is currently situated on approximately 89 +/- acres of land located within the County of Imperial, about half a mile south of the City of Calipatria. The property is currently divided into two separate zoning distinctions but with one land use designation. In 2008, the property underwent a Zone Change and General Plan Amendment, in which approximately 47 +/- acres changed from A-2 to M-2 zoning while the entire parcel changed from Agriculture to Urban Area land use. Currently, most of the eastern portion of the property is zoned M-2 while the entire western portion and small portions of the northeastern side of the property are zoned A-2 as indicated above.

The applicant proposes to construct a container yard that will act as storage area for loading and unloading containers and will be primarily situated on the southernmost portion of APN 024-260-032. A proposed inner rail-spur located within the existing rail-spur would be constructed for organizational purposes and due to regulations set forth by Union Pacific Rail-Road. The existing facility accommodates two trains per week, including one (1) train loaded with corn that unloads at the existing All-American Grain facility and (1) unit train that ships agricultural products to the Port of Long Beach. Because the applicant proposes to accommodate one (1) more unit train, scheduling conflicts will likely occur between the corn train and unit trains. This proposed inner rail-spur will allow the unit trains to cycle around the proposed inner rail-spur while the corn train utilizes the outer rail-spur, simultaneously.

The Project is being submitted for the Airport Land Use Commission's review and determination of consistency with the 1996 Airport Land Use Compatibility Plan (ALUCP) as per ALUC requirements: The applicant may construct a bridge that will be located at either Yocum Road or Albright road.

**The proposed site is located outside of an ALUC compatibility zone within the County of Imperial, however,**

"As required by State law, Scope of Review 2. Types of Actions Reviewed, #1 General Plan Consistency Review- The Commission shall review general plans and specific plan

of affected local jurisdictions to determine their consistency with the Commission's policies- State empowers the Commission to review Statutory Requirements- As required by state law, the following types of actions shall be referred to the Airport Land Use Commission for determination of consistency with the Commission's plan prior to their approval by the local jurisdiction (a) the adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676(b)).

**ALUCP Analysis:**

The Airport Land Use Compatibility Plan (ALUCP), Chapter 2, Section 1.3. 2 (a) & 1.3.2 (b) provides "Statutory Requirements" by the Commission, which include:

" The adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1"...,

" The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impact concerns listed in Paragraph 2 (Section 21676 (b))

The All American Grain LLC project is proposing a General Plan Amendment & adoption of zoning ordinance to an M-2 Medium Industrial use allowing for industrial permitted uses in the Urban Designated areas of the General Plan.

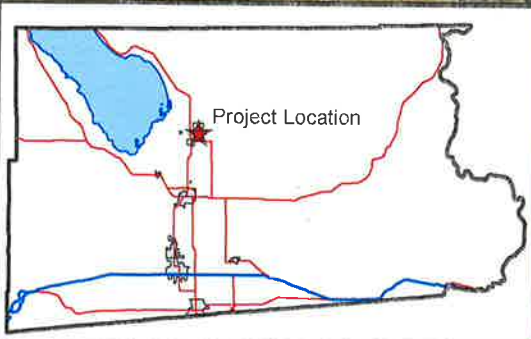
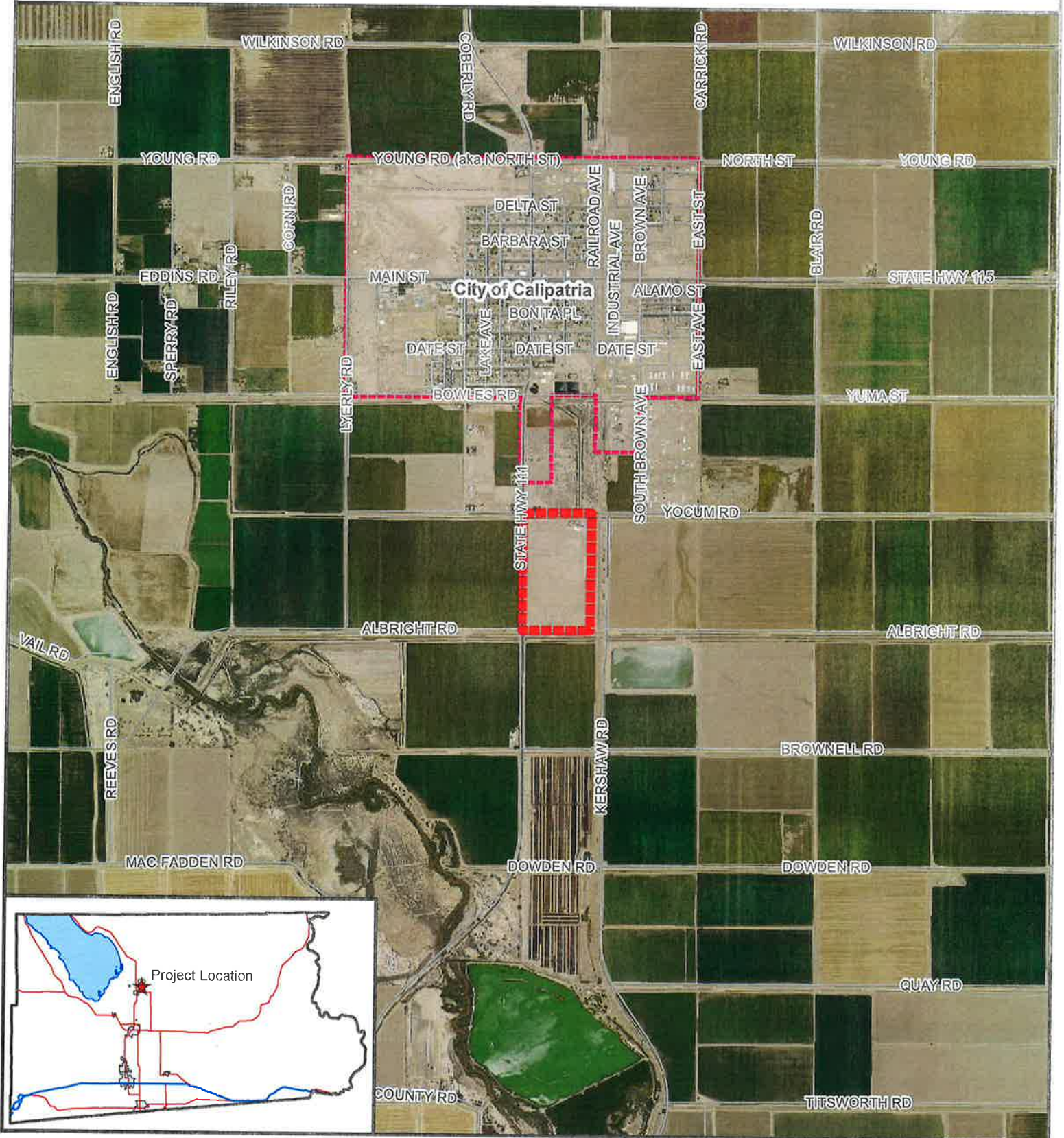
**It is staff's position that the proposed All American Grain General Plan Amendment #18-0001 & Zone Change # 18-0002 for a lay down & container facility could be considered consistent with the Airport Land Use Compatibility Plan (ALUCP).**

Attachment A:           site map  
Attachment B:           vicinity map

**ALUC FEB. 2019**  
**LOCATION MAP**

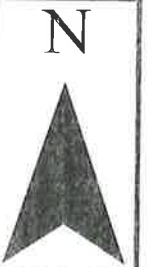


# PROJECT LOCATION MAP



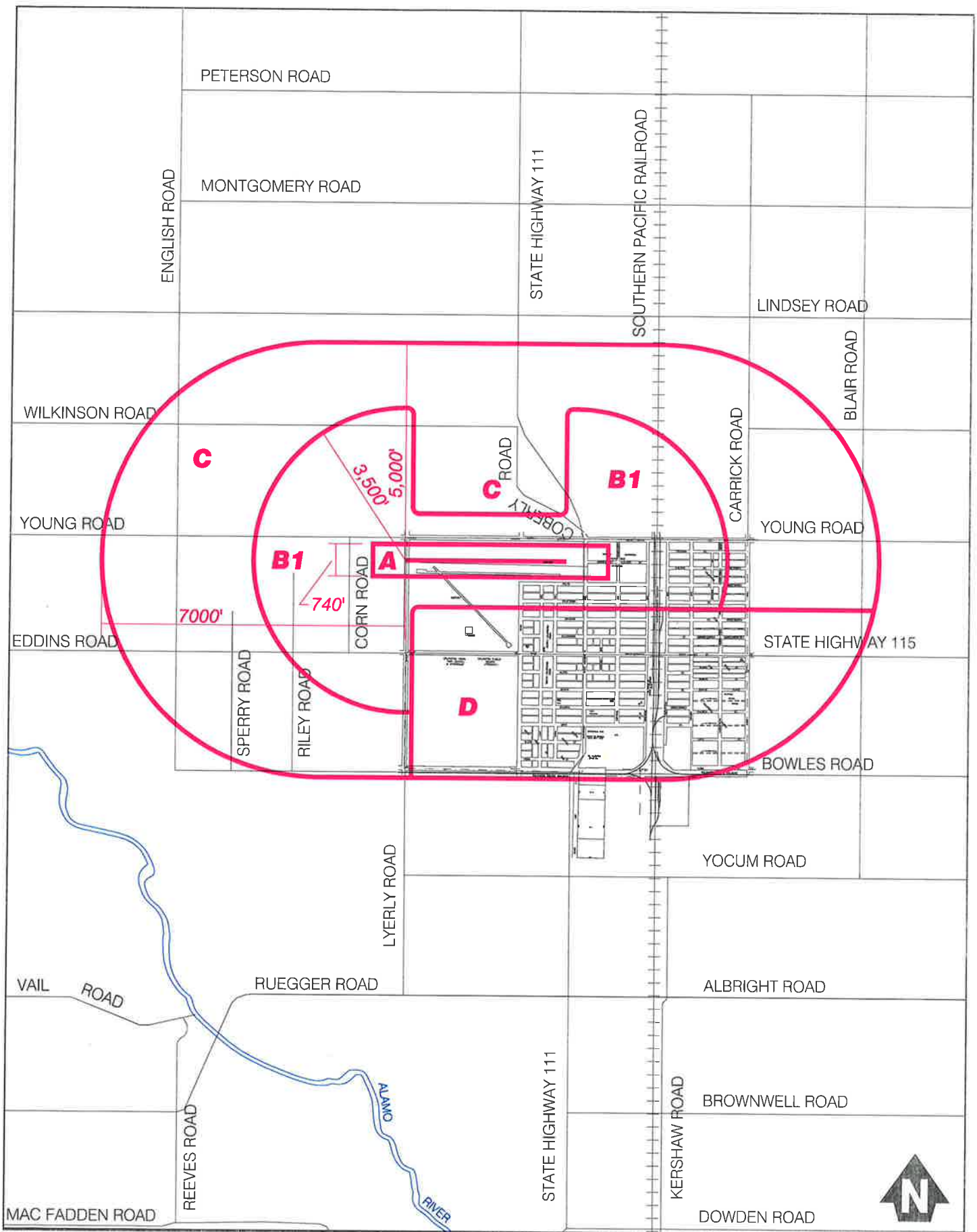
**ALL AMERICAN GRAN CO., LLC.**  
**ZONE CHANGE ZC#18-0002**  
**GENERAL PLAN AMENDMENT GPA #18-0001**  
**APN 024-260-032-000**

-  Project Location
-  Centerline
-  City Limit



**Attachment A.**  
**ALUCP CALIPATRIA &**  
**ZONE MAP**



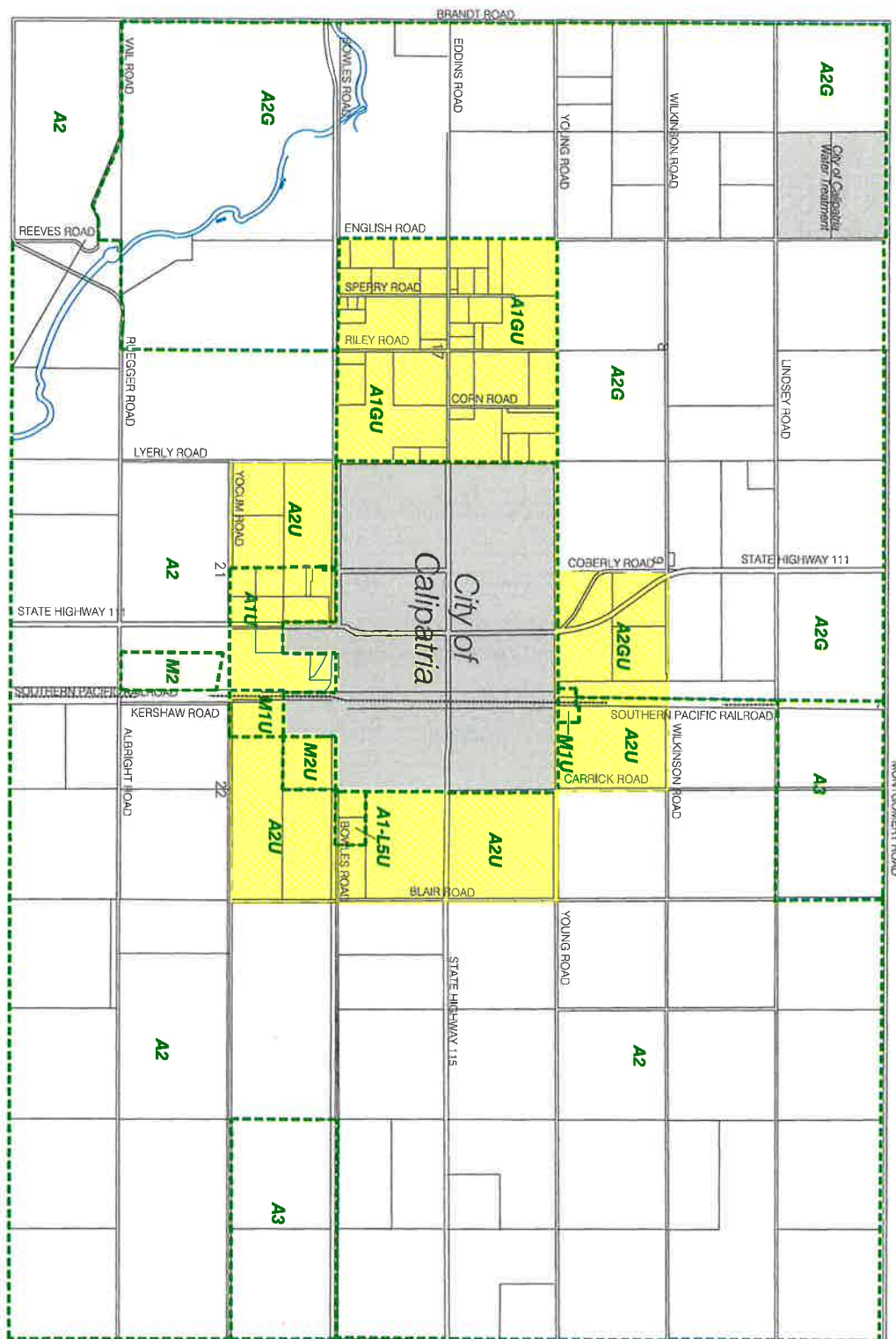


# **Compatibility Map** Calipatria Municipal Airport

K:\ALUCVAP-3C.DWG

**FIGURE 3C**

airport land use compatibility plan



Revision Notes:  
 Feb 25, 2008 - Zone Change (05-0010) for a portion of APN # 024-260-032-001  
 from A2 to M2  
 Aug 07, 2015 - Map correction to show Calipatria Water Treatment Plant

LEGEND  
 Urban Area

NOTE: Efforts have been made to insure zoning accuracy; however, this map may be revised at any time. Therefore this map is generally accurate, for zoning information only! Neither the County of Imperial nor the Planning/Building Department are responsible for erroneous information or improper use of this map.  
 Adopted by M. O. # 15 (b) on Feb. 10, 1998 effective July 1, 1998.

Director \_\_\_\_\_

# CALIPATRIA AREA

Title 9 Division 25 Section 92506.00

Revision Dates:

Feb 25, 2008

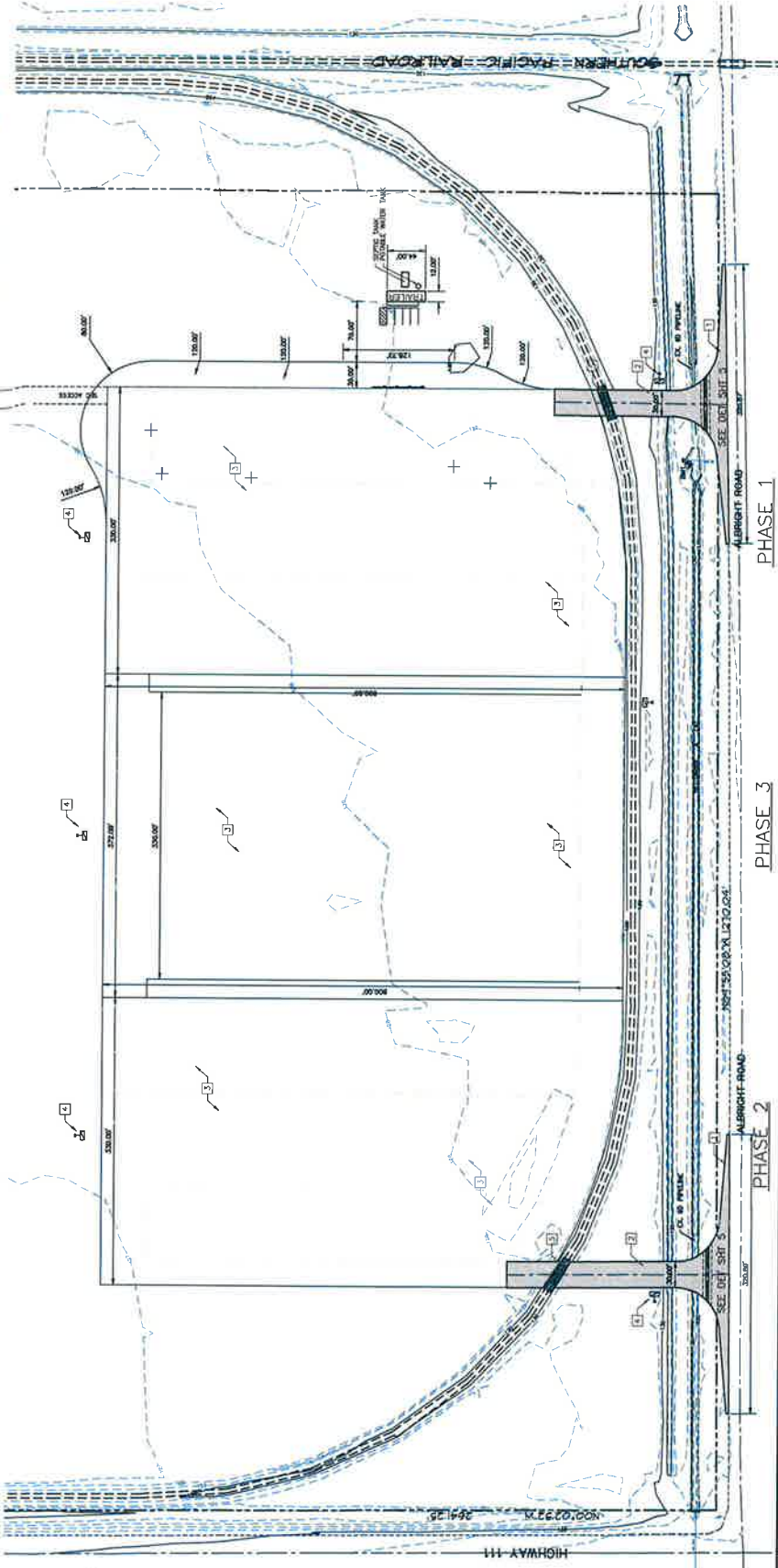
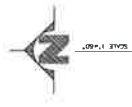
Aug 07, 2015

MAP  
 6

K:\ZONEMAPS\ZON6.DWG



- DRAWING CONSTRUCTION NOTES:**
- [1] INSTALL 12" DIA. CONCRETE PIPES AT 10' ON CENTER
  - [2] INSTALL 12" DIA. CONCRETE PIPES AT 10' ON CENTER
  - [3] INSTALL 12" DIA. CONCRETE PIPES AT 10' ON CENTER
  - [4] INSTALL 12" DIA. CONCRETE PIPES AT 10' ON CENTER
  - [5] INSTALL 12" DIA. CONCRETE PIPES AT 10' ON CENTER



		<b>ENGINEER OF RECORD</b> PLANS PREPARED UNDER THE SUPERVISION OF BY: OWENS CORNELIUS R.C.E. NO. 5542E		<b>EXHIBIT</b> ALL AMERICAN GRAIN CONTAINER YARD & SPUR LOADING IMPERIAL COUNTY		<b>SHEET</b> 1 of 1 1 SHEETS	
<b>UNIMPROVED SERVICE AREA</b> CALL TOLL FREE 811 FOR WARNING SIGNS BEFORE YOU DIG		<b>COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT</b> APPROVED FOR CONSTRUCTION BY: BY: SHELIA GAY PEE DIRECTOR OF PUBLIC WORKS R.C.E. NO. 82031		<b>DATE</b> 12/07/18 <b>BENCHMARK</b> SEE SHEET NO. 1		<b>DATE</b> 12/07/18 <b>BENCHMARK</b> SEE SHEET NO. 1	

**Attachment B.**  
**Project Description**

1/23/2019

## All American Grain Company- Zone Change & GPA

**Applicant:** All-American Grain Company, LLC

**Engineer:** LC Engineering Consultant, Inc. (License No. 55432)

**Planning:** DuBose Design Group, Inc.

**Contractor:** Andy Hoyt General Engineering, Inc. (License No. 578349)

**Location:** The site is located just south of the City of Calipatria, Imperial County, California. The approximate site address is Albright Road and Highway 111, Calipatria, California. Latitude and longitude are 33°06'28" and 115°30'43", respectively.

**Property Size:** 89 +/- acres

**Project Size:** 42 +/- acres

**APN:** 024-260-032

### **Proposed Development:**

All-American Grain, LLC (applicant) proposes a Zone Change (ZC) and General Plan Amendment (GPA) to the west half of APN: 024-260-032 in an effort to bring the parcel into conformance with applicable zoning & land use regulations. The Zone Change & General Plan Amendment will allow more acreage under the Medium Industrial use so that the applicant may establish a container yard, an additional inner rail-spur and a bridge allowing for alternative access. The proposed Zone



**Figure 1. Property Site**

Change will change the current A-2 (General Agriculture) zone to M-2 (Medium Industrial) zone, while the General Plan Amendment will amend the Imperial County Land Use Element *Table 4: Compatibility Matrix*<sup>1</sup>, located on page 64 of the Land Use Element. The current land use designation for APN: 024-260-032 is Urban Area which allows for compatibility with M-2 zoning as stated within the contents of the Land Use Element, however, this is not reflected in *Table 4: Compatibility Matrix*. This General Plan Amendment is meant to correct *Table 4: Compatibility Matrix* so that it is compatible with the Land Use Element's contents.

### **Project Summary:**

#### *The Project Site*

The entire APN 024-260-032 is currently situated on approximately 89 +/- acres of land located within the County of Imperial, about half a mile south of the City of Calipatria (please see **Figure 1**). The property is currently divided into two separate zoning distinctions but with one land use designations (reference **Appendix A**). In 2008, the property underwent a Zone Change and General Plan Amendment, in which approximately 47 +/- acres changed from A-2 to M-2 zoning while the entire parcel changed from Agriculture to Urban Area land use. Currently, most of the eastern portion of the property is zoned M-2 while the entire western portion and small portions of the northeastern side of the property are zoned A-2 as indicated above.

#### *Project Development*

The applicant proposes to construct a container yard that will act as storage area for loading and unloading containers and will be primarily situated on the southernmost portion of APN 024-260-032 (please see **Figure 5**). A proposed inner rail-spur located within the existing rail-spur would be construct for organizational purposes and due to regulations set forth by Union Pacific Rail-Road. The existing facility accommodates two trains per week, including one (1) train loaded with corn that unloads at the existing All-American Grain facility and (1) unit train that ships agricultural products to the Port of Long Beach. Because the applicant proposes to accommodate one (1) more unit train, scheduling conflicts will likely occur between the corn train and unit trains. This proposed inner rail-spur will allow the unit trains to cycle around the proposed inner rail-spur while the corn train utilizes the outer rail-spur, simultaneously. Additionally, through careful

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<sup>1</sup> [Imperial County Land Use Element](#)



consideration the applicant may decide to construct a bridge that will be located at either Option A or Option B (please see **Appendix B**). In an effort to maximize efficiency, access to the container yard will be provided to loaded trucks and emergency vehicles by the proposed bridge once either the inner and/or outer rail-spur is completely occupied.

### *Need for Project*

As of now, operations for agricultural exporters rely heavily on trucks for distribution purposes. As discussed below, containers are loaded with agricultural commodities and are driven via truck to the Port of Long Beach (POLB) for distribution. As the amount of containers being transported to POLB increases so does the level of complexity. As noted on the POLB's website, exports for the month of April from the POLB have increased by 22% as compared to last year. This level of increase places an even higher strain on nearby infrastructure, truck drivers/haulers and port authorities. The increased number of trucks to the POLB creates congestion on major highways to the Port, congestion at the port terminal and makes meeting appointment times at the terminal difficult to achieve. Additionally, the availability of logistic truck drivers has fallen, other labor markets such as construction are drawing these drivers away. To solve these issues, All American Grain Company proposes the construction of a loading/distribution facility that will utilize train units for distribution purposes to the POLB, thus cutting down the amount of trucks needed for distribution.

### *Project Use*

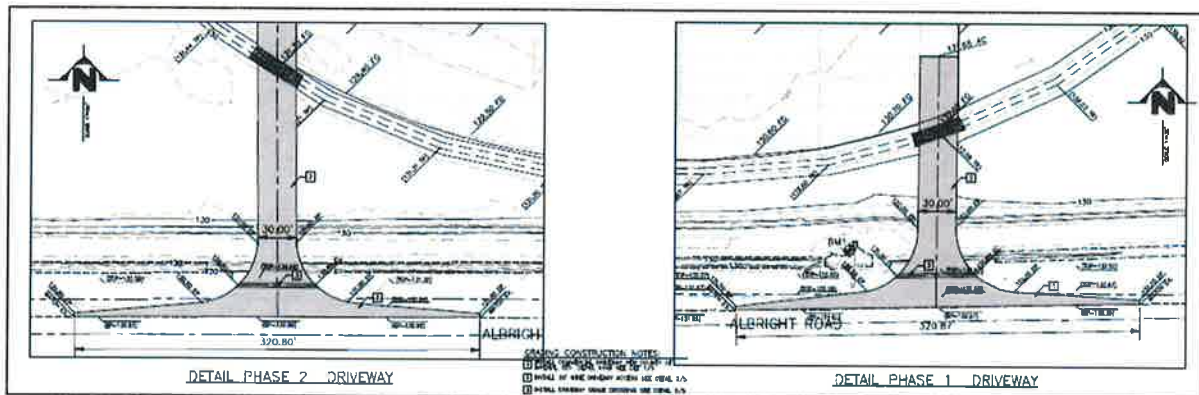
The current operations of the facility act as a grain transfer and storage station for locally grown containered agricultural commodities. These operations include the receiving of the agricultural commodities such as hay, and other types of locally grown rufage in storage containers, transported via trucks to the facility. Once these containers are received and stored for a short period of time, they are then reloaded on to unit trains for distribution outside of the Imperial Valley. Additionally, incorporated in the original operations of the facility was receiving corn via unit train cars that would then be distributed to various Feed mills in the Imperial Valley via truck that will continue.

The applicant wishes to add to the current use by relying more heavily on the unit train cars rather than trucks for distribution from the Imperial Valley by adding an additional one (1) unit train. The method of receiving and transporting the hay from locally harvested fields to the storage facility will remain. However, once the hay containers are stored and are ready to be reloaded, individual unit train cars will be the *primary method* of distribution to the POLB. Ultimately, the applicant's goal is to become more efficient with the delivery of out-going hay products that leave

the valley and reduce the amount of trip miles made by trucks. This addition of one-unit train of 105 well cars which is 210 containers will be needed to maximize the reduction of trip miles made by trucks. Once operations are in-motion, the empty storage facility will utilize their inner circle railway as a systematic method of offloading containers from the train and then reloading the containers that were loaded at the source. When the train unit cars are loaded and ready for distribution, they will leave the inner circle railway on their way to the POLB utilizing the Union Pacific Rail Road.

### *Project Circulation*

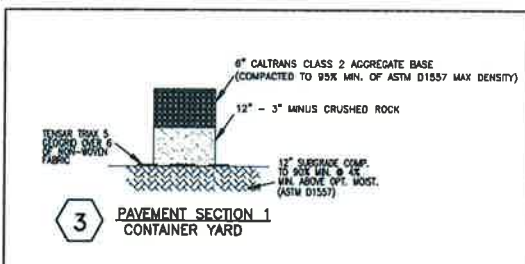
In order to gain access to the project site, the applicant requires the construction of two (2) driveways for purposes of ingress and egress. The driveway closest to the intersection of HWY 111 and E. Albright Rd will be utilized as the point of egress while the further east driveway will be utilized as the point of ingress. These access points will be located on the southern boundary of the site where E. Albright intersects HWY 111 (see **Figure 2**). The distance between the entrance to the facility and the turn-off from Hwy 111 will provide enough space if numerous trucks show up all at once. As discussed earlier, the applicant desires to have the ability to construct a bridge that will allow access to the storage container yard when both the existing and proposed additional rail spur are fully occupied.



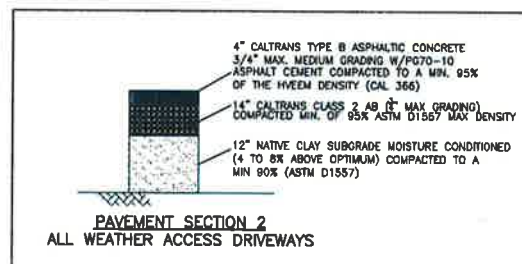
**Figure 2.** Driveways

### *Construction Activities*

In order to support the additional loading and unloading zones and to stay compliant with County of Imperial Planning Department, County of Imperial Fire Department and APCD, the proposed container yard will install “all weather surface” pavement to the standards of both the County of Imperial and the Air Pollution Control District. The container yard will accommodate containers that will be stacked 4 high over a space of 8 ft by 40 ft (the container on the ground level). There will be 840 containers within the loading area at the peak on one day. The stacks of containers will not exceed the height of the nearby silos. Individual containers will weight approximately 60,000 lbs when filled. Once stacked in fours the total approximate weight of the stack will be 240,000 lbs (a soils recommendation will be provided from a geotechnical expert). With this being said, the load bearing capacity for the surface must withstand this total amount of weight. For descriptions of the pavement section for both the Container Yard and the All-Weather Access Driveways please see **Figure 3** and **Figure 4**. The unloading and loading of the containers will occur two days per week, during these days the train will be on site for 10-12 hours for purposes of unloading and loading.



**Figure 3.** Container Yard



**Figure 4.** Access Driveways

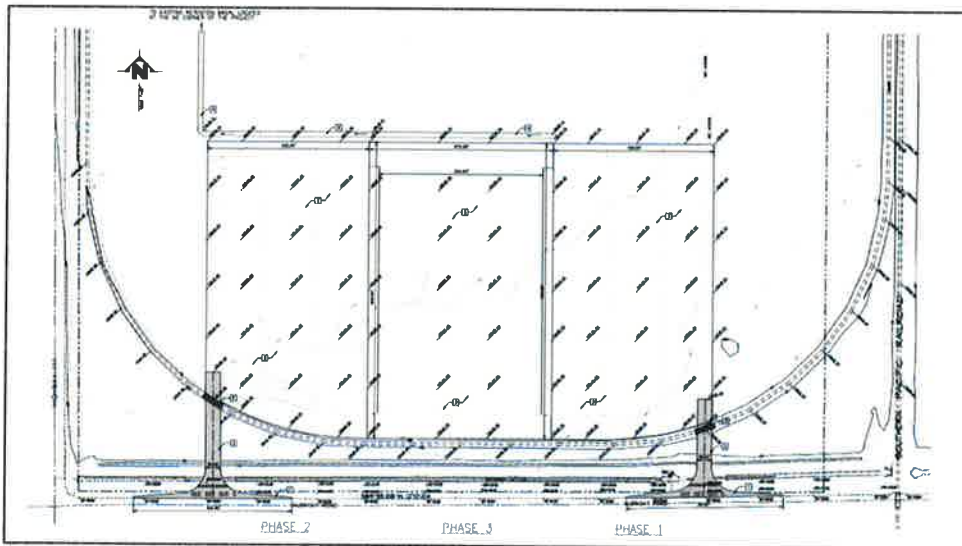
### *Project Operation*

As previously stated, the operation of the facility will act as a grain transfer and storage station for locally grown agricultural commodities. These commodities will be harvested throughout the Imperial Valley, loaded into empty containers and shipped via truck to the container yard. Upon arrival, the loaded containers will be stored at the container yard for a short period of time until the unit train arrives. Once the unit train has arrived, it will move into position for both unloading and loading. The train will move forward for every 10 railcars that are unloaded and loaded. The containers themselves are then unloaded and loaded via RS46 Series Hyster container loaders.

When the facility is completely operational, there will be a maximum of four (4) container loaders at the site.

### *Project Phasing*

It is the intent of the applicant to construct this container yard in phases (see **Figure 5**). On the furthest east portion of the project, contains Phase 1, which is permitted by right to allow for a container yard. Phase 1 is unrelated to this Zone Change and General Plan Amendment for the reason stated previously. As of 8/06/2018 and 8/07/2018, the applicant has submitted with County of Imperial Building Department and Public Works Department for a grading permit for Phase 1. Once the Zone Change and General Plan Amendment have been approved, grading permits will be submitted for Phases 2 & 3.



**Figure 5.** Project Phasing

### *Environmental Consideration*

It is understood by the applicant that this proposed alteration to the current use will trigger additional environmental studies. With consultation from the County of Imperial, it has been determined that environmental studies will include: (1) Air Study, (2) Noise Study, (3) Traffic Study and (4) Biological.



### *Air Study*

As instructed by the Imperial County Planning and Development Services, an Air Quality Study was performed by UltraSystems, Inc. analyzing the air quality including Greenhouse Gas Emissions generated by the proposed project. As further discussed in the Air Quality and Greenhouse Gas Emissions Report, sources of air pollution include locomotive emissions, container loader emissions, hauling truck emissions, and employee commuter emissions. These sources of emissions would emit pollutants of concern include ROG, CO, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. As the report indicates, the long-term project operational emissions would not exceed applicable thresholds for ROG, PM<sub>10</sub> or CO but they would exceed the Tier 2 threshold for NO<sub>x</sub>. However, as discussed in the attached Memo to the Air Quality Study, APCD requested that UltraSystems perform a comparison of criteria pollutants emissions from truck and train transport of Agricultural products from All American Grain in Calipatria to Riverside County Line. Ultimately, the amount of NO<sub>x</sub> decreases a substantial amount due to reliance on trains rather than trucks.

### *Noise Study*

As instructed by the Imperial County Planning and Development Services, a Noise Study was prepared by UltraSystems, Inc. analyzing the noise levels generated by the proposed project. As further discussed in the Noise Study Report, noise sources include container loaders, trucks, trains, landscape and building maintenance. Offsite noise would be attributed to project-induced traffic. Although the project would generate some noise, UltraSystems found that there would be no significant short- or long-term noise impacts due to the project so no mitigation measures are necessary.

### *Traffic Study*

As instructed by the Imperial County Planning and Development Services, a Traffic Study was prepared by Linscott Law & Greenspan (LLG) to analyze the traffic impacts caused by the proposed project. Based on information obtained from the applicant, LLG predicts the Total Project would generate a maximum of 20 Average Daily Traffic (ADT) by passenger vehicles. It would also generate 360 ADT by trucks, with 15 inbound and 15 outbound trips during the AM and PM peak hours. As previously discussed, the project would have driveways dedicated for both entrances and exits for vehicles (**Figure 2**).

*Biological Study*

As instructed by the Imperial County Planning and Development Services, a Biological Study was conducted by Barrett's Biological Surveys. They performed a biological habitat assessment of the lower portion where the project site would be located. As further described in the Biological Report, there were no vegetation that was found that would be considered endangered, threatened or species of concern. Additionally, there were no fauna found that would be considered endangered or threatened, however, three burrowing owls, one occupied burrow and one active burrow were found offsite on Imperial Irrigation District Right-of-Way. Mitigation measures were given for those instances.

## Appendix A

**Current Property Zoning**





**Proposed Property Zoning**





[email@dubosedesigngroup.com](mailto:email@dubosedesigngroup.com)  
[dubosedesigngroup.com](http://dubosedesigngroup.com)

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PLANNING • CIVIL ENGINEERING • LAND SURVEYING • PROJECT MANAGEMENT

## Appendix B

[illegible]

**Attachment C.**  
**Agency Comments**



**ADMINISTRATION / TRAINING**

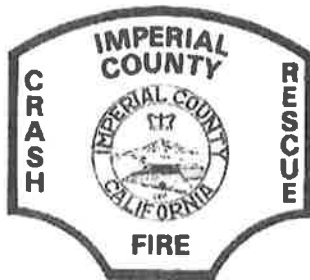
1078 Dogwood Road  
Heber, CA 92249

**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 5, 2019

RE: Zone Change 18-0002 and General Plan Amendment 18-0001  
All American Grain Container Yard, APN: 024-260-032

Imperial County Fire Department would like to thank you for the chance to review and comment on the All American Grain Container Yard Zone Change, General Plan Amendment and construction of a second (inner) railroad spur.

Imperial County Fire Department has the following comments and/or requirements.

- An approved water supply capable of supplying the required fire flow determined by appendix B in the California Fire Code shall be installed and maintained. Private fire service mains and appurtenance shall be installed in accordance with NFPA 24.
- Fire department access roads and gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box/lock for access on site.
- Compliance with all required sections of the fire code.
- Fiscal Impacts will remain open until meeting with department head(s) and developer(s), which may include but not limited to:
  - Capital purchases which may be required to assist in servicing this project
  - Costs for services during construction and life of the project
  - Training

The zone change will required an approved pressurized water supply capable of meeting required fire flows to be installed and maintained in accordance with the California Fire Code. M-2 Zone (medium Industrial) will require greater water demand due to the potential hazards and fire loads associated with industrial operations.

The proposed second (inner) spur railroad track will required unobstructed access to the container yard at all times before the construction of the inner spur and its operation. Access roads shall meet all requirements from the California Fire Code for fire apparatus roadways. Imperial County Fire Department is requiring two (2) points of entry based on potential impairments. Bridges will be constructed in accordance with the California Fire Code and shall be able to carry imposed loads of fire apparatus.

Imperial County Fire Department reserves the right to comment at a later time as we feel necessary.

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

Sincerely  
Andrew Loper  
Lieutenant/Fire Prevention Specialist  
Imperial County Fire Department  
Fire Prevention Bureau



AIR POLLUTION CONTROL DISTRICT



December 26, 2018

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

SUBJECT: Request for GPA 18-0001 and ZC 18-0002 and CUP 07-0023 (Recirculation) for the purpose of establishing a Container Yard and Rail Spur.

Dear Mr. Minnick,

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the request by All American Grain Company, LLC for a proposed General Plan Amendment (GPA) 18-0001, Zone Change (ZC) 18-0002, and Conditional Use Permit (CUP) 07-0023. The GPA and ZC to the west half of APN 024-260-032 would ultimately allow for the establishment of a Container Yard and Rail Spur at 305 E. Yocum Road in Calipatria, California.

Due to ongoing conversations with the Enforcement and Engineering & Permitting Divisions of the Air District, the applicant is aware that compliance with Regulation VIII Rules is a requirement. Any changes to the details of the proposal can be addressed in future conversations between the two parties. Other than that, the Air District has No Comment.

As a reminder, Air District Rules and Regulations can be found on our website at [www.co.imperial.ca.us/AirPollution](http://www.co.imperial.ca.us/AirPollution) under the "Planning" tab. The ICAPCD office can be reached at (442) 265-1800.

Sincerely,

Curtis Blondell  
Environmental Coordinator

**RECEIVED**

**DEC 26 2018**

**IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES**



COUNTY OF  
IMPERIAL

DEPARTMENT OF  
PUBLIC WORKS

155 S. 11th Street  
El Centro, CA  
92243

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

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*Public Works works for the Public*



January 24, 2019

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

**RECEIVED**

**JAN 25 2019**

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

Attention: David Black, Planner IV

**SUBJECT: ZC 18-0002 / GPA 18-0001 – All American Grain Company, LLC**  
Located on 306 E. Yocum Road, Calipatria, CA  
APN 024-260-032-000

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on April 25, 2018 for the above mentioned project. The applicant proposes to rezone a portion of the aforementioned property in hopes of creating a more uniform zoning area and clean-up the inconsistent zoning of their single property caused by prior zone change.

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

1. Yocum Road is classified as 4-Lane Major Collector requiring eighty four feet (84) of right of way, being forty two (42) feet from existing centerline. Forty feet (40') of right of way has been provided per Grant Deed Doc # Book 2249 pg. 1381, 2003. As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).
2. Albright Road is classified as 2-Lane Minor Collector requiring seventy feet (70) of right of way, being thirty five (35) feet from existing centerline. Seventeen feet and Six inches (17'-6") of right of way has been provided per Grant Deed Doc # Book 2249 pg. 1378, 2003. Sufficient right of way must be provided to meet this road classification. As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).
3. The applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Plan/Study shall be prepared per the Engineering Design Guidelines Manual for the Preparation and checking of Street Improvement, Drainage, and Grading Plans within Imperial County and submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plan. Employment of the appropriate Best Management Practices (BMPs) shall be included on the plan.

An Equal Opportunity / Affirmative Action Employer



4. The applicant for encroachment permits, grading plans, and/or improvement plans is responsible for researching, protecting and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted by the project whether it be on-site or off-site.
5. At time of development, if required, by Section 8762(b) of the Professional Land Surveyors Act, a record of survey shall be filed with the County Recorder of Imperial County.
6. Street improvements shall be required in conjunction with, but not limited to, any construction, grading, or related work, including the construction of structures, buildings, or major additions thereto, on property located adjacent to any county street or on property utilizing any county street for ingress and egress, except that such improvements may be deferred as described in Section 12.10.040 of this chapter for residential property (Per Imperial County Code of Ordinances, Chapter 12.10.020). The street improvements required shall be a commercial type driveway per Imperial County Standards and a secondary emergency access driveway as approved by this Department. The secondary emergency access driveway shall be constructed of asphalt concrete or as approved by this Department.
7. No building permit for any structure or building or major addition to a building or structure shall be issued until the improvements required by Section 12.10.010 of this chapter have been installed and/or bonded. In addition, no building permit shall be issued until there has been compliance with Chapter 12.12 of this title and the requirement that an encroachment permit be obtained (Per Imperial County Code of Ordinances, Chapter 12.10.030).
8. Any activity and/or work within Imperial County right-of-way shall be completed under an encroachment permit issued by this Department (Per Imperial County Code of Ordinances, Chapter 12.12). Any activity and/or work may include, but not be limited to, the installation of temporary traffic control devices, construction of access driveways, etc.
9. The applicant shall update the transportation impact analysis at one (1) year and five (5) years from the date of the Zone Change Approval and/or as directed by the Road Commissioner. The updates of the transportation impact analysis shall include:
  - a. Current traffic volume data along County Roads (within 1 year of the date of the transportation impact report update) at the following locations:
    - i. Albright Road between State Route 111 and Kershaw Road
    - ii. Albright Road between Kershaw Road and State Route 115
    - iii. Yocum Road between State Route 111 and Kershaw Road
    - iv. Yocum Road between Kershaw Road (west) and Kershaw Road (Brown Road)
    - v. Yocum Road between Kershaw Road (Brown Avenue) and Blair Road
    - vi. Yocum Road between Blair Road and State Route 115

- vii. Blair Road between Yocum Road and State Route 115
- viii. Kershaw Road between Albright Road and Yocum Road
- ix. Kershaw Road (Brown Avenue) between Yocum Road and Calipatria City Limits

- b. If the transportation impact analysis to be completed within five (5) years of the Zone Change Approval warrants the installation for right and/or left turn lanes into the facility, the applicant shall fund the construction for said turn lanes.

10. Figure 7-1 of the transportation impact analysis indicates that 15% of the truck traffic will be using Yocum Road east of Kershaw Road (Brown Avenue). This section of Yocum Road is unpaved.

- a. Section E - Unpaved Haul/Access Roads Requirements of Rule 805 of the Imperial County Air Pollution Control District limits any traffic on unpaved roads to generate visible dust emissions (VDE) to less than 20% opacity. If the applicant is unable to maintain the opacity level as required by Rule 805, the applicant shall mitigate the generation of dust due to project traffic along Yocum Road between Kershaw Road (Brown Avenue) and Blair Road and along Blair Road between Yocum Road and State Route 115 by one of the methods below:
  - i. Asphalt Concrete Road Improvements: The road section shall be improved by installing two (2) 12-foot travel lanes consisting of 4 inches of asphalt concrete over 18 inches of Class 2 Base, including Class 2 base shoulder backing, as approved by the Director of Public Works. Any activities related to these road improvements shall be completed under an encroachment permit from this Department.
  - ii. Road Surface Chemical Stabilization: The road surface shall be stabilized by applying chemical stabilization products as recommended by the product manufacturer to accommodate for two (2) 12-foot travel lanes and as approved by the Director of Public Works. Any activities related to this road stabilization shall be completed under an encroachment permit from this Department.
  - iii. Aggregate Base Road Improvements: The road section shall be improved by installing two (2) 12-foot travel lanes consisting of a minimum of 3" of Class 2 Base material, as recommended by a California Geotechnical Engineer, and as approved by the Director of Public Works. Any activities related to these road improvements shall be completed under an encroachment permit from this Department.
  - iv. Road Dust Mitigation Plan: The applicant shall prepare a Road Dust Mitigation Plan and submit it to this Department for review and approval. Any activities related to the implementation of the road dust mitigation plan shall be completed under an encroachment permit from this Department.
  - v. Traffic Restriction: Any existing and/or proposed project traffic, truck or passenger vehicles, associated with the project site shall be restricted from

using the road section. The transportation impact analysis shall be revised to indicate the revised traffic distribution and resubmitted to this Department for review and approval prior to the Zone Change Approval.

**INFORMATIVE:**

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

- All solid and hazardous waste shall be disposed of in approved solid waste disposal sites in accordance with existing County, State and Federal regulations (Per Imperial County Code of Ordinances, Chapter 8.72).
- All on-site traffic area shall be hard surfaced to provide all weather access for fire protection vehicles. The surfacing shall meet the Department of Public Works and Fire/OES Standards as well as those of the Air Pollution Control District (APCD) (Per Imperial County Code of ordinances, Chapter 12.10.020 A).
- The project may require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior county approval of onsite grading plan (40 CFR 122.28).
- A Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater than legal loads on riding surfaces, including bridges. (Per Imperial County Code of Ordinances, Chapter 10.12.020).
- As this project proceeds through the planning and the approval process, additional comments and/or requirements may apply as more information is received.

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

Respectfully,

  
John A. Gay, PE  
Director of Public Works

FO/cv



## **AUGUSTINE BAND OF CAHUILLA INDIANS**

**PO Box 846 84-481 Avenue 54 Coachella CA 92236**

**Telephone: (760) 398-4722**

**Fax (760) 369-7161**

**Tribal Chairperson: Amanda Vance**

**Tribal Vice-Chairperson: William Vance**

**Tribal Secretary: Victoria Martin**

December 27, 2018

Daivd Black

Imperial County Planning & Development Services  
801 Main St. El Centro, CA 92243


**Re: Project Notification Pursuant to Senate Bill 18 for the All American Grain Project in  
Imperial County, California**

Dear Mr. Black-

Thank you for the opportunity to offer input concerning the development of the above-identified project. We appreciate your sensitivity to the cultural resources that may be impacted by your project, and the importance of these cultural resources to the Native American peoples that have occupied the land surrounding the area of your project for thousands of years. Unfortunately, increased development and lack of sensitivity to cultural resources has resulted in many significant cultural resources being destroyed or substantially altered and impacted. Your invitation to consult on this project is greatly appreciated.

At this time we are unaware of specific cultural resources that may be affected by the proposed project. We encourage you to contact other Native American Tribes and individuals within the immediate vicinity of the project site that may have specific information concerning cultural resources that may be located in the area. We also encourage you to contract with a monitor who is qualified in Native American cultural resources identification and who is able to be present on-site full-time during the pre-construction and construction phase of the project. Please notify us immediately should you discover any cultural resources during the development of this project.

Very truly yours,

  
Victoria Martin  
Tribal Secretary

**RECEIVED**

**DEC 31 2018**

**IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES**





# COLORADO RIVER INDIAN TRIBES

## *Tribal Historic Preservation Office*

26600 Mohave Road  
Parker, Arizona 85344  
Telephone: (928)-669-5822 Fax: (928) 669-5843

Imperial County Planning  
801 Main St.  
El Centro, CA 92243

Date: January 8, 2019

RE: All-American Grain – General Plan Amendment, GPA 18-0001/ zone change ZC 18-0002, APN #024-260-032-000.

Dear: Jim Minnick, Director

The Colorado River Indian Tribes' Tribal Historic Preservation Office ("CRIT THPO") has received your letter dated December 14, 2018, regarding the All-American Grain – General Plan Amendment, GPA 18-0001/ zone change ZC 18-0002 APN #024-260-032-000.

As a preliminary matter, the Colorado River Indian Tribes are a federally recognized Indian tribe comprised of over 4,200 members belonging to the Mohave, Chemehuevi, Hopi and Navajo Tribes. The almost 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Tribe's members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona and Nevada were occupied by the ancestors of the Colorado River Indian Tribes' Mohave and Chemehuevi members since time immemorial. These landscapes remain imbued with substantial cultural, spiritual and religious significance for the Tribes' current members and future generations. For this reason, we have a strong interest in ensuring that potential cultural resource impacts are adequately considered and mitigated.

In addition, we respond as follows, The Colorado River Indian Tribes do not have any specific comment on the proposed project and instead defer to the comments of other affiliated tribes. Thank you for your consideration. Please contact the undersigned if you have any questions or concerns.

Sincerely,

**COLORADO RIVER INDIAN TRIBES  
TRIBAL HISTORIC PRESERVATION OFFICE**

  
/s/ Bryan Etsitty, Acting-Director  
26600 Mohave Road  
Parker, AZ 85344  
Phone: (928) 669-5822  
E-mail: [betsitty@crit-nsn.gov](mailto:betsitty@crit-nsn.gov)

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JAN 14 2019

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES



# IID

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May 14, 2018

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

SUBJECT: All American Grain Company, LLC GPA No. 18-0001 and ZC No. 18-0002

Dear Mr. Black:

On April 25, 2018, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on General Plan Amendment no. 18-0001 and Zone Change no. 18-000. The applicant, All American Grain Company, LLC; is proposing to rezone a portion of property to correct the inconsistent zoning created by a prior zone change. The property is located at 306 E. Yocum Road, Calipatria, CA.

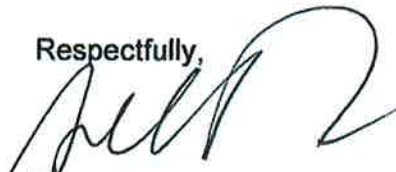
The Imperial Irrigation District has assessed the information and has the following comments:

1. IID water facilities that may be impacted include the Nectarine Lateral A along the parcel's southern boundary and the B Drain along the parcel's northern boundary. An existing ethanol plant entrance/drain crossing is located along the parcel's northern boundary. No new construction is proposed with the General Plan amendment or zone change. However, IID Water Department should be consulted prior to the installation of any facilities adjacent to IID's facilities. For further information, IID Water Engineering Services can be contacted at (760) 339-9265.
2. In addition, If future impacts to IID water facilities should result, the IID Water Department must be informed regarding encroachments, drainage and water service.
3. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <http://www.iid.com/departments/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

4. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
5. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at [dvgargas@iid.com](mailto:dvgargas@iid.com). Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas  
Compliance Administrator II

Kevin Kelley – General Manager  
Mike Pacheco – Manager, Water Dept.  
Charles Allegranza – Manager, Energy Dept., Operations  
Jamie Asbury – Deputy Manager, Energy Dept., Operations  
Carlos Vasquez – Deputy Manager, Energy Dept. Planning & Engineering  
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Asst. General Counsel  
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance  
Harold Walk Jr. – Supervisor, Real Estate  
Randy Gray – ROW Agent, Real Estate  
Jessica Lovecchio – Environmental Project Mgr. Sr., Water Dept.