PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE

AGENDA DATE: August 27, 2020

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME 1:30 PM / No. 1

West Wind Parking Storage, Inc.

PROJECT TYPE: GPA #19-0002, ZC #19-0003 & CUP #19-0013 SUPERVISOR DIST # 5

LOCATION: 429 E. Heber Road APN: 054-240-022, 023, 024 and 025

Heber, CA PARCEL SIZE: (±)57.43 AC

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) Heber Specific Plan Area

ZONE (existing) General Agricultural (A-2), Medium Commercial-No Residential-Geothermal-Specific Plan Area (C-2-N-G-SPA) and Light Industrial-No Residential-Geothermal-Specific Plan Area (M-1-N-G-SPA)

ZONE (proposed) Light Industrial-No Residential-Geothermal-Specific Plan Area (M-1-N-G-SPA)

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

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 08/27/2020

INITIAL STUDY: #19-0012

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

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

REQUESTED ACTION:

(See Attached)

EEC ORIGINAL PKG

☐ NEGATIVE DECLARATION
☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

General Plan Amendment #19-0002
Zone Change #19-0003
Conditional Use Permit #19-0013
West Wind Parking Storage, Inc.

Prepared By:

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

(August 2020)

TABLE OF CONTENTS

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 General Plan Amendment #19-0002, Zone Change #19-0003 & Conditional Use Permit #19-0013, where the intent of the project is to expand the existing industrial use (trucking terminal). (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 Mitigated Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County

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

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

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

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

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

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

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

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

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

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

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

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

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

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

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

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

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

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

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

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

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

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

2. **Incorporation By Reference**

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

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

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (760) 482-4236.

- 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. (760) 482-4236.

- 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**: General Plan Amendment #19-0002, Zone Change #19-0003 & Conditional Use Permit #19-0013 for West Wind Parking Storage, Inc. (Initial Study #19-0012)

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

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

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

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

6. **Project location**: The project site is located at the southeastern corner of East Heber Road and Hwy 111 in Heber. The following parcels are identified as (for GPA) APN: 054-240-022/023/024/025; (for ZC) APN: 054-240-022/023/025 and (for CUP) APN: 054-240-023.

7. **Project sponsor's name and address**: West Wind Parking Storage Inc., PO Box 1545, Heber, CA 92249

8. **General Plan designation**: Agricultural

9. **Zoning**: APN 054-240-022 and 025, C-2-N-G-SPA (Medium Commercial); APN 054-240-023, A-2 (General Agriculture); APN 054-240-024, M-1-N-G-SPA (Light Industrial)

10. **Description of project**: The applicant, West Wind Parking Storage, Inc., has applied for General Plan Amendment #19-0002 proposing to designate Assessor Parcel Numbers 054-240-022-000, 054-240-023-000, 054-240-024-000 and 054-240-025-000 from an Agriculture designation to a Specific Plan Area designation under Land Use Map of the Land Use Element of the Imperial County General Plan.

    Currently, Zone Change #19-0003 proposes to convert an existing 20-acre parcel (054-24-023-000) from A-2 (General Agriculture) to M-1 (Light Industrial) zone to allow for the expansion of an existing truck parking facility. The project also proposes to correct the existing two established industrial uses under Parcels 054-240-022-000 and 054-240-025-000 from C-2 (General Commercial) to M-1 (Light Industrial) zone. The two parcels consist of existing truck storage facilities. Parcel 054-240-023-000 is currently vacant. No changes to the existing overlay designation for Parcel 054-240-022-000 and 054-240-025-000 are proposed, but would be included to Parcel 054-240-023-000.

    Additionally, the Applicant proposes Conditional Use Permit #19-0013 for an expansion of a truck storage facility use to Parcel 054-240-023-000.

11. **Surrounding land uses and setting**: The project site is bounded by agricultural fields to the east and south, Highway 111 to the west, and the Imperial Center project is to the north of the project site and located approximately 1.8 miles to east of Heber.

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

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 confidentially, etc.?** Native American Heritage Commission (NAHC), Quechan Indian Tribe and Torres-Martinez Indian Tribe were contacted and invited to participate in the Request for Review and Comments as part of the Initial Study review process. An AB52 letter was also sent out to the Quechan Indian Tribe for a 30 day consultation period for review and comment. No other comments were received.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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

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

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

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

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

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

Jim Minnick, Director of Planning/EEC Chairman Date: 9/27/20

EEC ORIGINAL PKG

PROJECT SUMMARY

A. **Project Location**: The project site is located at the southeastern corner of East Heber Road and Hwy 111 in Heber. The parcels are identified as (for GPA) APN: 054-240-022/023/024/025; (for ZC) APN: 054-240-022/023/025; and (for CUP) APN: 054-240-023

B. **Project Summary**: The applicant, West Wind Parking Storage, Inc., has applied for a General Plan Amendment #19-0002 proposing a change to APN 054-240-022-000, 054-240-024-000 and 054-240-025 (existing industrial use facilities) from the existing Agriculture designation to Specific Plan Area designation and to include the proposed project site of APN 054-240-023-000 into (for the expansion of a freight storage yard) into the Specific Plan Area designation; a Zone Change to convert the existing A-2 (General Agriculture) zone to APN 054-240-023-000 (for the proposed expanded area) to M-1 (Light Industrial), as well as a Zoning Map correction for APN 054-240-022-000 and 054-240-25-000, these two existing C-2 (General Commercial) zone parcel to M-1 (Light Industrial), and a Conditional Use Permit #19-00013 (for APN 054-240-023-000) for the proposed expansion of the freight storage yard project.

C. **Environmental Setting**: The project site is bounded by agricultural fields to the south and Highway 111 to the west. Imperial Center project is to the north of the project site and located approximately 1.8 miles to east of Heber.

C. **Analysis**: As mentioned above, Assessor Parcel Number 054-240-022-000, 054-240-023-000 and 054-240-024-000 and 054-240-025 are designated Agriculture. The General Plan Amendment would convert the designation from Agriculture to Specific Plan Area for Parcels 054-240-022-000, 054-240-024-000 and 054-240-025, which consist of existing Industrial uses facilities, and include the proposed expansion for Parcel 054-240-023-000, which is currently vacant land.

Assessor Parcel Number 054-240-024-000 is zoned M-1-N-G-SPA, Assessor Parcel Numbers 054-240-022-000 and 054-240-025-000 are zoned C-2-N-G-SPA and Assessor Parcel Number 054-240-023-000 is zoned A2. With the zone correction for parcels 054-240-022-000 and 054-240-025-000 from C-2 to the M-1 zone, the correction of these two parcel would make then consistent with the existing industrial uses, and to change the zone for parcel number 054-240-023 from A-2 to M-1 would allow for the expansion of a truck parking facility project.

Conditional Use Permit for Assessor Parcel Number 054-240-023 is for the proposed trucking (parking) terminal. Pursuant to Section 90215.02(yy), trucking terminals are permitted uses with an approved Conditional Use Permit.

E. **General Plan Consistency**: As previously mentioned, the project application with the approval of the project, it bring these Parcels into conformance with the industrial uses; thus, making them consistent with the Imperial County General Plan.

Exhibit "A"
Vicinity Map

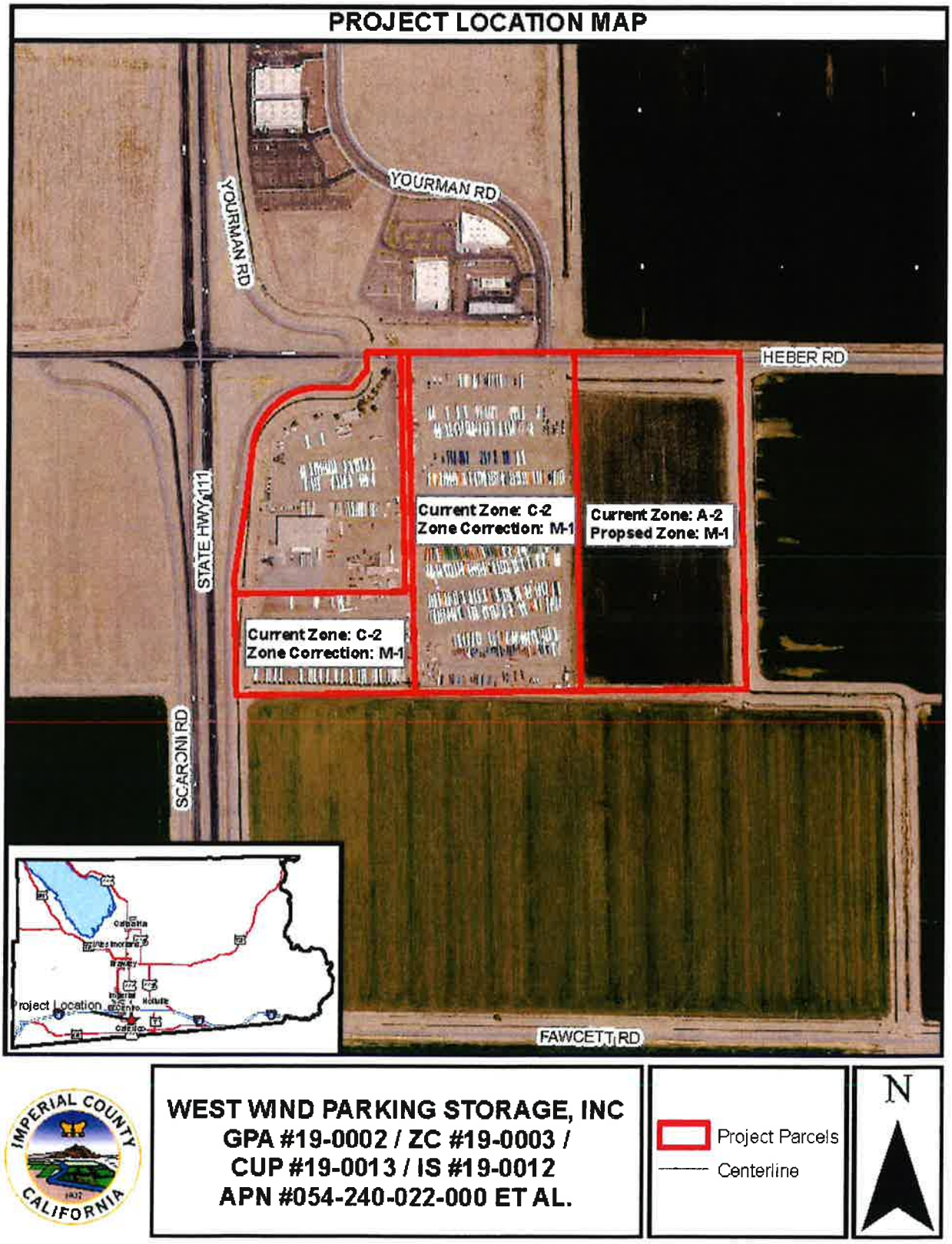
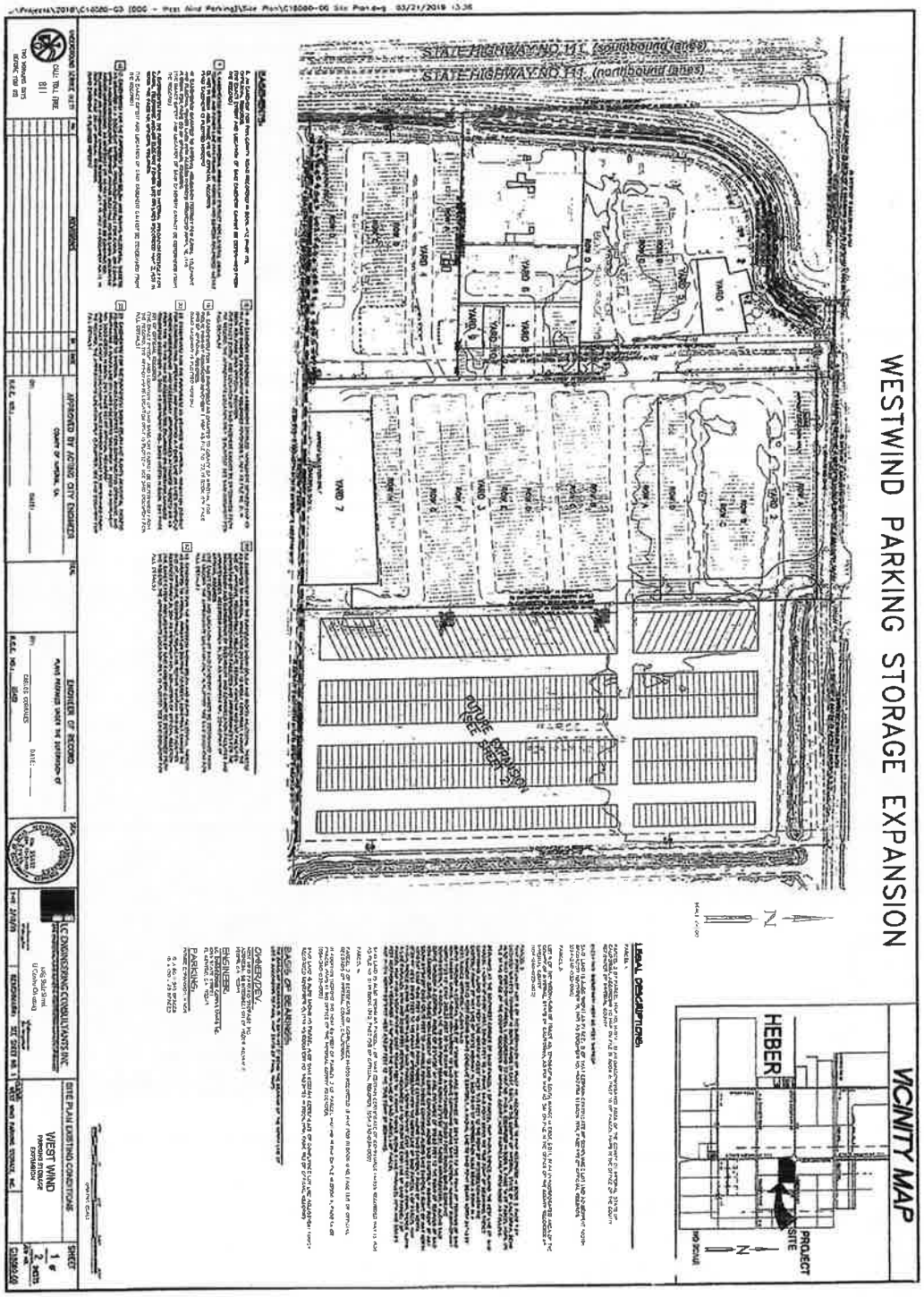


Exhibit "B"
Site Plan



EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

I. *AESTHETICS*

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

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

a) According to the Imperial County General Plan, Circulation and Scenic Highways Element[1], the project site is not located on or near the scenic vista or scenic highway or eligible for future Scenic Highway Designation in reference to Highway 111. Accordingly, implementation of the proposed project would not appear to have additional adverse effect on the scenic vista as there already is an existing non-conforming tucking terminal operating from the project site; less than significant impacts are expected.

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

b) There are no scenic resources such as trees, rock outcroppings or historic buildings surrounding the project site; therefore, no impacts are expected.

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

c) The proposed project will not further degrade the existing visual character or quality of public views of the site and its surrounding. Staff research shows that a non-conforming use (trucking terminal) has been operating from the project site for at least 23 years. The project will also not conflict with applicable zoning and other regulations governing scenic quality; therefore, less than significant impacts are 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 would create an additional source of light or glare for security purposes, however, the additional lighting would not adversely affect day or nighttime views in the area. Therefore, less than significant impacts are expected.

II. *AGRICULTURE AND FOREST RESOURCES*

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

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

a) According to the California Department of Conservation Farmland Mapping and Monitoring Program (2016)[2], the project site's Farmland Type is designated as "Urban and Built-Up Land" (APNs- 054-240-022/024/025) and "Farmland of Statewide Importance Farmland" (APN- 054-240-023). According to Table 9 (Imperial "County 2014-2015 Land Use Conversion) of the California Department of Conservation, the County currently has 297,272 acres of Farmland of Statewide Importance land and the proposed General Plan Amendment and Zone Change would permanently convert 20 acres in the Farmland of Statewide Importance category. MM AFR-1 reduces the impacts to less than significant.

MM AFR-1: The Applicant shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30% of the fair market value per acre for the 20-acres based on five (5) comparable sale of land used for agricultural purposes be collected prior to the commencement of work. The Agricultural In-Lieu Mitigation Fee shall be placed in a trust account administered by the

[1] http://www.icpds.com/CMS/Media/Circulation-Scenic-Highway-Element-(2008).pdf. Page 30
[2] ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/imp16.pdf

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

Imperial County Agricultural Commissioner's Office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County.

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

b) The project site is not under the Williamson Act contract; therefore 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 is located within existing farmland and built-up area that will not conflict with existing zoning or cause rezoning of forest land, timberland or timberland zoned Timberland Production. Therefore, no impacts are expected.

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

d) As previously stated, the proposed project is located within existing farmland and build-up area that will not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impacts would occur.

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) As mentioned under item a) above, one proposed parcel would involve the conversion of Farmland of Statewide Importance to non-agriculture use; however, this proposed 20-acre parcel abuts and existing developed land and would not appear to effect the surrounding farmland. Any impact to farmland would appear to be less than significant.

III. *AIR QUALITY*

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

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

a) The proposed project is to expand the footprint of an existing truck onto the adjacent 20-acre parcel and is not expected to conflict with or obstruct implementation of an applicable air quality plan. The Imperial County Air Pollution Control District (ACAPCD) has jurisdiction over air quality for the project area. The ICAPCD adopted rules and regulation directed at attainment of the state and national air quality standards. Conformance with rules and regulation for the proposed project is determined by demonstrating compliance with local land use plans. All development projects within the IAPCD jurisdiction are required to comply with existing rules as they apply to each specific project. Compliance with ICAPCD requirements will reduce any impacts to a level less than significant.

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

b) An air quality study was prepared by Birdseye Planning Group dated May 2019 to identify the potential significant air quality effects on the environment that could result from short term (i.e. construction activities) and long term (i.e. implementation and operation) impacts on the project. With the following measures MM AQ-1a and MM AQ-1b, impacts would be reduced to a level less than significant:

MM AQ-1a: Prior to commencing construction, the project applicant will be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM10 emission and associated mitigation measures during the construction (see Rule801 F.2.). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standards for dust control:

- **All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or greater silt content.**

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

- **All on-site unpaved roads segments or areas use for hauling materials shall be effectively stabilized. Visible emission shall be limited to no greater than 20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering.**
- **The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.**
- **All track-out or carry-out on paved public roads, which include bulk materials adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.**
- **Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line except where such material or activity is exempted from stabilization by the rules of ICAPCD.**
- **No more than 6 acres of surface area should be disturbed during any one day period and the delivery of surface materials, including asphalt grindings, should be limited to approximately 27 truck trips daily (assuming 20 yards per truck) over a 30 day period to overlap with site grading operations.**

AQ-1b: Each project proponent shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions contained in the imperial County DEQA Air Quality Handbook and associated regulations. These measures include:

- **Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment shall meet U.S. tier standards.**
- **Minimize idling time, by either shutting equipment off when not in use or reducing the time or idling to five minutes at a maximum.**
- **Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).**
- **Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.**
- **Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts.**

With implementation of AQ-1a and AQ-1b, construction related impacts would be less than significant. No additional mitigation would be required.

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

c) The proposed project does not anticipate exposing receptors to substantial pollutants concentrations, as the nearest receptor is a single-family residence located on the south side of Correll Road approximately 2,535 feet north of the site. Therefore, no impact are anticipated.

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

d) The proposed project would generate odors from construction; however, this would be temporary and not exceed ICAPCD impact thresholds; thus short-term odors are not expected to be significant. No odors would be associated with the project operation. Odor impact would be less than significant.

IV. *BIOLOGICAL RESOURCES Would the project:*

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

a) The proposed project site is not located within a designated sensitive habitat nor an agency-designated habitat area, but is within the "Burrowing Owl Species Distribution Model" according to the Imperial County General Plan's Conservation and

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

is within the "Burrowing Owl Species Distribution Model" according to the Imperial County General Plan's Conservation and Open Space Element, Figure 2[3]. The proposed project is not expected to have adverse impact on any species or their habitats; therefore, less than significant impacts are expected.

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 Element, the project site is not located within a sensitive or riparian habitat, nor within a sensitive natural community. Less than significant impacts are expected to occur regarding adverse effects on the above habitats.

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

c) The proposed project will not have a substantial adverse effect on state or federally protected wetlands, as the project site is not located near a protected wetland. Less than significant impacts are expected.

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

d) The project site is not located on or near a body of water and no fish or wildlife species would be affected by the proposed project. In addition, it would not impede the use of native wildlife nursery sites since there are none immediately surrounding the project site; therefore, no impacts are 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 policies or ordinances protecting biological resources. Therefore, less than significant 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) Imperial County does not have a Habitat Conservation Plan (HCP). Thus, with regards to the HCP, no impacts would occur. Some lands in the County under the jurisdiction of the Bureau of Land Management (BLM) are covered by the California Desert Conservation Area (CDCA) Plan which includes Areas of Critical Environmental Concern (ACEC). The project site is not within or immediately adjacent to an ACEC of the CDCA. Therefore, no impacts are expected.

V. *CULTURAL RESOURCES* *Would the project:*

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

a) As depicted on Imperial County's General Plan Figure 6, *Conversation and Open Space Element*[4], the project site was not identified as containing a historic resource. Accordingly, the project would not appear to impact a historical resource as defined by CEQA. Less than significant impacts are anticipated.

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

b) The project site is not located within an archeological site of significance as shown in the Conservation and Open Space Element. Less than significant impacts are anticipated.

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

[3] http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
[4] http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf

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

c) There are no known cemeteries on or surrounding the project site. The project site is not known to have been a formal or informal cemetery. Therefore, the proposed project is not expected to disturb any human remains and less than significant impacts are anticipated.

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

a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

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

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

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

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

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

a) The proposed project does not appear to directly or indirectly cause potential adverse effects, including risk of loss, injury, or death; therefore, less than significant impacts are expected.

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

1) The proposed project is not located within a known fault zone. Less than significant impacts are anticipated.

2)	Strong Seismic ground shaking?	☐	☐	☒	☐

2) Ground shaking is expected to occur being that the project site is located in the seismically active Imperial Valley, with numerous mapped faults of the San Andreas Fault System traversing the region. No new structures are proposed as part of the project; therefore less than significant impacts are anticipated.

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

3) The project site does not appear to be located on geological units or soil that is unstable or that would become unstable as a result of seismic activities, including liquefaction and seiche/ tsunami. No impacts are anticipated.

4)	Landslides?	☐	☐	☐	☒

4) According to the Imperial County General Plan Landslide Activity Map, Figure 2[5], Seismic and Public Safety Element, the project site does not lie within a landslide activity area and therefore, no impacts are anticipated.

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

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

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

c) The project site is not known to be located on unstable geological units and/or soil, and the conditions for lateral spreading, subsidence, liquefaction and collapse are not present; therefore, less than significant impacts are expected.

d)	Be located on expansive soil, as defined in the latest Uniform	☐	☐	☐	☒

[5] http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf

		Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
	Building Code, creating substantial direct or indirect risk to life or property? **d) The project site is not characterized by an expansive soils that would be considered environmentally significant. Potential impact deriving from expansive soils are considered negligible. Therefore, no impacts are expected.**				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? **e) No additional septic tanks or other alternative waste water disposal systems are being proposed as part of the application. Less than significant impacts are expected.**	☐	☐	☒	☐
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 any unique paleontological resources. Less than significant impacts are anticipated.**	☐	☐	☒	☐

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

a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? **a) The project proposes an expansion of a new truck parking facility adjacent to an existing truck parking facility. Due to the small amount of traffic and equipment during construction and operation, the project would not create a substantial greenhouse gas emission. Pursuant to the Air Quality and Greenhouse Gas E 1,217.7 metric tons of annual emission would be generated which is well below the 3,000 metric tons threshold; therefore, any impact would be less than significant.**	☐	☐	☒	☐
b)	Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? **b) The proposed project does not anticipate to conflict with any applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases. Therefore, no impacts are expected.**	☐	☐	☐	☒

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

a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? **a) The project proposes is not expected to create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials. The CUP does not authorized the hauling and storage of hazardous material and/or on-site truck maintenance or repair operations. No impacts are anticipated.**	☐	☐	☐	☒
b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? **b) The proposed project is not expected to create a significant hazard to the public or environment through reasonable foreseeable upset and accident conditions involving the release of hazardous material into the environment. A less than significant impact would be expected.**	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? **c) The proposed project does not include hazardous materials in its scope of work nor is located within one-quarter miles of an existing or proposed school; therefore, less than significant impacts are anticipated.**	☐	☐	☒	☐
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	☐	☐	☐	☒

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

hazard to the public or the environment?

d) The project site is not listed of hazardous material sites and would not create a significant hazard to the public or the environment. 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? ☐ ☐ ☐ ☒

e) The project site is not located within a runway protected zone or approach/departure zone of a local airport. There are no nearby public airports as shown in the Airport Land Use Compatibility Plan (Figure 1A)[6]. No Impacts are anticipated.

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

f) The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. Less than significant impacts are expected.

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

g) The proposed project site is not located in an area susceptible to wildland fires, therefore, no 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? ☐ ☐ ☐ ☒

a) The proposed project is not expected to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. No impact are anticipated.

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

b) The proposed project would not require the usage of groundwater or would interfere substantially with groundwater recharge. There are no known water wells (permitted or not) within the project site; therefore, no impact are expected.

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

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

(i) The proposed project is not expected to substantially alter the existing drainage patterns on site. A Grading/drainage Plan/Study will have to be approved by Imperial County Public Works prior to any works on site. Any alteration to drainage patterns will not alter any existing nearby streams or rivers that would result in substantial erosion or siltation on or off-site. According to the Imperial County General Plan Erosion Activity Map, Figure 2[7], Seismic and Public Safety Element, the area is designated low activity. Therefore, less than significant impacts are anticipated.

(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 can contribute to ruffoff water, but is not expected to exceed the capacity of the existing IID stormwater drainage system; therefore, no impacts are expected.**

(iii) create or contribute runoff water which would exceed ☐ ☐ ☒ ☐

6 http://www.icpds.com/CMS/Media/Airport-Locations.pdf
7 http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf

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

the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;

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

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

(iv) The project site is located on Zone X, which is "Area of Minimal Flood Hazard" under FEMA Flood Map 06025C2100C; therefore, less than significant impacts are expected.

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

d) According to the California Emergency Management Agency and the Department of Conservation[8], the project site is not located within a Tsunami Inundation Area for Emergency Planning; therefore, 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 does not appear to conflict or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. No impact are expected.

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

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

a) The project site would not isolate any established communities. The proposed project site is surrounded by built-up industrial land and agricultural land and therefore, no impacts can be expected.

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

b) The proposed project would not conflict with the County's General Plan or Land Use Ordinance and meets the requirements for a General Plan, Zone Change and a Conditional Use Permit. Also, in accordance with the Imperial County General Plan- Conservation and Open Space Element, Figure 1- Sensitive Habitats[9], the proposed project site is not located within a habitat conservation plan or natural community conservation plan area. Therefore, no impact are expected.

XII. *MINERAL RESOURCES Would the project:*

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ☐ ☐ ☒ ☐

a) In accordance with the California Department of Conservation- Mineral Land Classification[10], the project site in not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region of the residents of the State of California. Less than significant impacts are anticipated.

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) In accordance with the Imperial County General Plan- Conservation and Open Space Element- Figure 8- Existing Mineral

[8] Department of Conservation Tsunami Inundation Maps http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=tsunami
[9] http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
[10] https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

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

Resources[11], the project site in not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the local general plan, specific plan or other land use plans. Less than significant impacts are anticipated.

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 is not expected to expose any people to substantial noise impacts as it is adjacent to an existing adjacent parking facility and if so, a less than significant impact is expected.

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

b) The noise from construction is not expected to expose persons to excessive groundbourne vibrantion or noise levels for an indefinite amount of time; therefore, less than significant impact would be expected.

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 project site is not located within a runway protected zone or approach/departure zone of a local airport. There are no nearby public airports as shown in the Airport Land Use Compatibility Plan (Figure 1A)[12]. No impacts are anticipated.

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

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

a) The proposed project does not include any residential projects nor any physical changes to the agricultural land. Therefore, no impacts are expected.

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

b) Implementation of the project would not displace substantial numbers of existing housing and would not necessitate the construction of replacement housing elsewhere. No impacts are anticipated.

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 will not result in any adverse physical impacts associated with any new or altered governmental facilities or require the need for new or altered governmental facilities. Therefore, no impacts are anticipated.

1) Fire Protection?	☐	☐	☒	☐

[11] http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
[12] http://www.icpds.com/CMS/Media/Airport-Locations.pdf

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

1) The proposed project is not expected to create a substantial adverse impact to fire protection. Any impacts would appear to be less than significant.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed project is not expected to create a substantial adverse impact to police protection. Any impacts would appear to be less than significant.

3) Schools? ☐ ☐ ☐ ☒

3) The proposed project is not expected to directly or indirectly draw a substantial number of new residents to the region that would generate school-aged students requiring public education. As the project would not cause or contribute a need to construct new or physically altered public school facilities, no impacts are anticipated.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the proposed project would not adversely affect any park facility and no impacts would be anticipated.

5) Other Public Facilities? ☐ ☐ ☐ ☒

5) The proposed project is not expected to result in a demand for other public facilities services. As such, implementation of the proposed project would not adversely affect other public facilities or require the construction of new or modified public facilities. Therefore, no impacts are expected.

XVI. *RECREATION*

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

a) The proposed project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. Therefore, no impacts are anticipated.

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

b) The proposed project does not propose to construct any new on or off-site recreational facilities. Additionally, the project would not expand any existing on or off-site recreational facilities. Thus, environmental effects related to the construction or expansion of recreational facilities would not occur with implementation of the proposed project. Therefore, no impacts are anticipated.

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 is not expected to conflict with the Imperial County General Plan's Circulation and Scenic Highways Element and/or any applicable plan, ordinance or policy related to the transportation aspect. Less than significant impacts are anticipated.

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

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

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

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

incompatible uses (e.g., farm equipment)?

c) The proposed project does not have any design features that would increase hazards or incompatible uses. Less than significant impacts are anticipated.

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

d) The proposed project will not result in inadequate emergency access; therefore 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 would not cause an adverse change in the significant of a tribal cultural resource. Assembly Bill 52 requires a lead agency to begin consultation with California Native American tribe that is traditionally and culturally affiliated with geographic area of the proposed project. Imperial County has consulted with appropriate tribes with the potential for interest in the region. Based on this consultation, the project site is not located in an area identified as having the potential for a tribal cultural resource; 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 proposed site was not listed under the California Historical Resources in County of Imperial[13] nor does it appear to be eligible under Public Resources Code Section 21074 or 5020.1 (k); therefore, less than significant impacts are expected.

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

(ii) There appears to be no history or association in the past with any evidence of historical resources for the property to be either identified as of significance or as candidate for listing in the California Register; therefore, less than significant impacts are expected.

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

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

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

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

[13] Office of Historic Preservation http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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

b) The proposed project is not expected to exceed the capacity of the current service provider and no expanded entitlements are needed. Therefore, no 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? ☐ ☐ ☒ ☐

c) The proposed project would not cause an impact to the wastewater treatment provider. Less than significant impacts are anticipated.

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

d) The proposed project will not generate any additional solid waste that would be in excess of State or local standards or in excess of the capacity of local infrastructure or impair the attainment of solid waste reduction goals. Less than significant impact is expected.

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

e) The proposed project does not require a solid waste plan and appears to comply with all federal, state and local statues and regulations related to solid waste; 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? ☐ ☐ ☐ ☒

a) The proposed project will not substantially impair any adopted emergency response plan or emergency evacuation plan. Therefore, no impacts are expected.

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

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

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

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

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

d) The proposed project will not expose people or structures to significant risks by flooding or landslips as a result of runoff, post-fire slope instability or drainage changes as the proposed project is located on flat terrain; therefore, no 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

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

Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

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

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Joe Hernandez, Project Planner Iv
- Imperial County Air Pollution Control District
- Ag Commissioner
- Imperial County Public Works Department

B. OTHER AGENCIES/ORGANIZATIONS

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

V. REFERENCES

1. http://www.icpds.com/CMS/Media/Circulation-Scenic-Highway-Element-(2008).pdf. Page 13
2. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/imp16.pdf
3. http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
4. http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
5. http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf
6. EnviroStor Database http://www.envirostor.dtsc.ca.gov/public/
7. http://www.icpds.com/CMS/Media/Airport-Locations.pdf
8. http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf
9. Department of Conservation Tsunami Inundation Maps
   http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=tsunami
10. http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
11. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc
12. http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf
13. http://www.icpds.com/CMS/Media/Airport-Locations.pdf
14. Office of Historic Preservation http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

VI. 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: General Plan Amendment #19-0002, Zone Change #19-0003 and Conditional Use Permit #19-0013 / Initial Study #19-0012

Project Applicant: West Wind Parking Storage, Inc. – P.O. BOX 1545, Heber CA

Project Location: The project site is located at the southeastern corner of East Heber Road and Hwy 111 in Heber. The parcel are identified as (GPA) APN: 054-240-022/023/24/025; (ZC) APN: 054-240-022/023/025 and (CUP) APN: 054-240-023.

Description of Project: The applicant, West Wind Parking Storage, Inc., has applied for a General Plan Amendment #19-0002 to allow for the expansion of the Heber Specific Plan Area on the General Plan Land Use Map to incorporate the existing industrial uses east of Hwy 111 and south of Heber Road as well as the proposed parcel abutting the existing industrial use fronting Heber Road. Concurrently, the Applicant is proposing Zone Change #19-0003 and a zone map correction. The zone change is to convert the existing 20 acre A-2 parcel (APN 054-240-023) to an M-1 zone to allow for the expansion of the existing truck parking facility and the zone correction would be to take the existing two established industrial areas (APN 054-240-022 (6.42 acres) & 054-240-025 (20.1 acres)) and convert to an M-1 (light industrial) zone. A Conditional Use Permit #19-0013 is proposed for the expansion of the existing industrial use onto APN 054-240-023.

VII. FINDINGS

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

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

☐ The Initial Study identifies potentially significant effects but:

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

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

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

A NEGATIVE DECLARATION will be prepared.

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

NOTICE

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

8/27/20

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

8-27-20

Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

COUNTY OF IMPERIAL
PUBLIC HEALTH DEPARTMENT

ROBIN HODGKIN, M.P.A.
Director

STEPHEN W. MUNDAY, M.D., M.P.H.
Health Officer

August 2, 2019

Isabel Patten, Planner II
IC Planning & Development Services
801 Main Street
El Centro, CA 92243

Subject: **General Plan Amendment #19-0002; Zone Change #19-0003; Conditional Use Permit #19-0013**

Dear Ms. Patten:

The Imperial County Public Health Department, Division of Environmental Health (DEH), is providing the comments below, in response to the July 17, 2019 request for review and comments. Based on the documentation provided, the parcel undergoing this process APN #054-240-022/ 023/ 024/ 025 proposes to undergo a General Plan Amendment (19-002) to allow for expansion to incorporate existing industrial use; Zone Change (19-0003) to an M-1 zone to allow for the expansion of business, and a Conditional Use Permit (19-0013) to allow for the expansion of the existing industrial use onto APN 054-240-023. Our agency is providing the following comments for consideration by the project applicant:

Potable Water

If the number of individuals on-site, including employees and vendors on the parcels exceed 25, a public water system permit will be required as triggered by the Safe Drinking Water Act. However, if each parcel/business has their own water supply line, each parcel/business is looked at individually when determining if they are subject to the SDWA. Based on the project description, the proposed project would not be subject to the SDWA if they do not share a water supply line. Therefore, clarification from the applicant showing existing and proposed water supply lines for both properties is required.

If potable water lines are to be extended from the Heber Public Utility District (HPUD) to supply the proposed project site, a will-serve letter will be required from HPUD in lieu of private point of entry (POE) installations at each of the four parcels. If the

parcels are unable to connect to HPUD and opts to receive water from the Imperial Irrigation District for on-site domestic use, POE water systems will need to be installed at each business. If POE water systems are installed, prior to occupying any plumbed structures, private water potability review applications (including sample results and treatment unit information) for each structure shall be submitted to DEH for review. Please note that the required lab testing, performed as a part of a water potability review, typically takes 2-3 weeks to collect and analyze through a California ELAP certified laboratory.

Mosquito Abatement Plans

In the project summary for the General Plan Amendment, Zone Change, and Conditional Use Permit, the applicant has indicated grading plans and a retention basin for capturing stormwater run-off will be developed. Any storm water retention basins built in relation to this project will require a mosquito abatement plan. The applicant should contact the Division of Environmental Health for guidance on the development of a Mosquito Abatement Plan.

Wastewater Disposal

The applicant will be required to identify all on-site waste water treatment systems (septic systems) and replacement areas located on any of the project locations (APN #054-240-022/ 023/ 024/ 025. Identification of existing OWTS is to be performed by a qualified professional (as defined in County Ordinance 8.80.030) and will require a site plans drawn to scale to include, septic tank, leach fields, and replacement areas.

If in the future the applicant proposes to develop an occupied building or structure, on parcel 054-240-023 the installation of an OWTS will require a septic system permit from the DEH. It is suggested that applicant consult with an engineer, familiar with Imperial County's on-site OWTS standards, to discuss the feasibility, location, and size of the septic system that would serve this facility. DEH suggests this be done early in the site planning process, in order to allow applicant to dedicate ample space, on the parcel, to the OWTS' leach field and the required contingent leach field replacement area.

Animal Keeping

The proposed zone change does not allow any keeping of large, small, or wild animals of any kind. County Ordinance will not permit the applicant to keep any existing or future animals on site for domestic, farming, or illegal activity. This means that any existing animals must be immediately removed in a safe and dignified manner.

This letter is being provided as a guide for project planning. DEH reserves the right to provide specific comments concerning your project at any time during the environmental review process. DEH encourages the applicant to visit our office to discuss the project in detail.

If you have any questions, please do not hesitate to contact me at 442-265-1888.

Sincerely,

Vanessa R. Martinez, MPH
Environmental Health Compliance Specialist II

IID

A century of service.

www.iid.com

Since 1911

July 19, 2019

RECEIVED

JUL 19 2019

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Ms. Isabel Patten
Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: West Wind Parking Storage (Park-N-Store, LLC) Project; GPA #19-0002, ZC #19-0003 and CUP #19-0013

Dear Ms. Patten:

On July 3, 2019, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the West Wind Parking Storage (Park-N-Store, LLC) project; General Plan Amendment #19-0002, Zone Change #19-0003 and Conditional Use Permit #19-0013. The applicant is requesting land use changes to allow for the expansion of an existing truck parking facility located at the southeastern corner of East Heber Road and Hwy. 111 in Heber, CA

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

1. The IID needs to maintain access to the existing 1-phase overhead line between the existing truck parking facility and the future expansion (see enclosed map). If the applicant requires that the distribution line be relocated or needs electrical service for the proposed expansion, the applicant should be advised to contact Joel Lopez, IID Customer Project Development Planner, at (760) 482-3444 or e-mail Mr. Lopez at jflopez@iid.com to initiate the customer service application process. In addition to submitting a formal application (see http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit a complete set of approved plans, project schedule, estimated in-service date, one-line diagram of facility, electrical loads, panel size, voltage, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. A circuit study may be required. The applicant shall be responsible for any and all costs related to relocating the line and/or to provide electrical service to the project, any mitigation measures required would be the financial responsibility of the developer.

2. IID water facilities that may be impacted include the Alder Canal and the Alder Drain.

3. The applicant may not use IID's canal or drain banks to access the project site. Any abandonment of easements or facilities will be approved by IID based on systems (Irrigation, Drainage, Power, etc.) needs.

4. To insure there are no impacts to IID's Alder Canal or Alder Drain, the project's design plans should be submitted to IID Water Department Engineering Services prior to

finalization. IID Water Engineering can be contacted at (760) 339-9265 for further information.

5. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

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

7. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to 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 dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

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

IID Electrical Facilities in the Project Area

EEC ORIGINAL PKG

Joe Hernandez

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Monday, June 1, 2020 11:28 AM
To: Joe Hernandez
Subject: West Wind Parking Storage Project

This email is to inform you that we do not wish to comment on this project.

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

Quechan Indian Tribe
Historic Preservation Officer
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-572-2423
Cell: 928-261-0254
E-mail: historicpreservation@quechantribe.com

ADMINISTRATION / TRAINING
1078 Dogwood Road
Heber, CA 92249

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

Training
Phone: (442) 265-6011

IMPERIAL COUNTY CRASH RESCUE FIRE

OPERATIONS/PREVENTION
2514 La Brucherie Road
Imperial, CA 92251

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

Prevention
Phone: (442) 265-3020

September 9, 2019

RE: Park-N-Store, LLC
General Plan Amendment #19-0002; Cone Change #19-0003 and Conditional Use Permit #19-0013

Imperial County Fire Department would like to thank you for the chance to review and comment on the West Wind Parking Storage (Park-N-Store, LLC) Zone Change, General Plan Amendment and Conditional Use Permit.

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 shall be a width of a least 20 feet and all weather surface capable of supporting fire apparatus. Fire department access roads will be provided with approved turn around approved by Imperial County Fire Department. Gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box/lock for access on site.
- A Hazardous Waste Material Plan shall be submitted to Certified Unified Program Agency (CUPA) for their review and approval.
- All hazardous liquids and wastes shall be handled, store, and disposed as per the approved Hazardous Waste Materials Plan. All spills shall be documented and reported to Imperial County Fire Department and CUPA as required by the Hazardous Waste Material Plan.
- All storage and handling of flammable and combustible liquids shall be in accordance with the California Fire Code and all federal, state, and local regulations, codes, and ordinances.
- Compliance with all required sections of the fire code.
- Fiscal Impacts will remain open until meeting with fire 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-1 Zone (Light Industrial) will require greater water demand due to the potential hazards and fire loads associated with industrial operations.

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

Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

RECEIVED
SEP 09 2019
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

July 17, 2019

REQUEST FOR REVIEW AND COMMENTS

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

To: County Agencies

☒ County Executive Office- Andy Horne	☒ EHS Office – Jeff Lamoure/ Vanessa R. Martinez	☒ IC Sheriff's Office –Thomas Garcia
☒ County Executive Office – Esperanza Colio-Warren	☒ Native American Heritage Commission-Katy Sanchez	☒ IC Fire/OES Office – Robert Malek/ Andrew Loper
☒ Public Works – John Gay/ Carlos Yee	☒ Caltrans, District 11- Melina Pereira	☒ IID Env. Compliance. - Donald Vargas
☒ APCD – Matt Dessert/Monica Soucier	☒ Fort Yuma Quechan Indian Tribe- H. Jill McCormick	☐ Brawley Elementary School District- Jamie Silva
☒ Ag. Commissioner – Carlos Ortiz/ Sandra Mendivil	☒ Fort Yuma Quechan Indian Tribe-Jordan D. Joaquin	☐ Niland Fire District – Alfredo Estrada Jr

From: Case Planner: Isabel Patten, Planner II - (442) 265-1736 Ext. 1750 or E-mail at ICPDSCommentLetters@co.imperial.ca.us.

Project ID: General Plan Amendment (GPA) #19-0002; Zone Change (ZC) #19-0003 and Conditional Use Permit (CUP) #19-0013

Project Location: (GPA) APN: 054-240-022/023/024/025; (ZC) APN: 054-240-022/023/025 and (CUP) APN: 054-240-023. Project site located at the southeastern corner of East Heber Road and Hwy 111 in Heber.

Project Description: The Applicant has applied for a General Plan Amendment #19-0002 to allow for the expansion of the Heber Specific Plan Area on the General Plan Land Use Map to incorporate the existing industrial uses east of Hwy 111 and south of Heber Road as well as the proposed parcel abutting the existing industrial use fronting Heber Road. Concurrently, the Applicant is proposing a Zone Change #19-0003 and a zone map correction. The zone change is to convert the existing 20 acre A-2 parcel (APN 054-240-023) to an M-1 zone to allow for the expansion of the existing truck parking facility and the zone correction would be to take the existing two established industrial areas (APN 054-240-022 (6.42 acre) & 054-240-025 (20.1 acre)) and convert to an M-1 (light industrial) zone. A Conditional Use Permit #19-0013 is proposed for the expansion of the existing industrial use onto APN 054-240-023.

Applicants: Dubose Design Group on behalf of the owner Park-N-Store, LLC. 1065 State Street, El Cento CA 92243

Comments due by: August 2, 2019 at 05:00 p.m. **Environmental Evaluation Comm. Meeting: TBD**

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

Name: _____ Signature: _____ Title: _____

Date: _____ E-mail: _____

I:\MSIS\AP... ...Comments 070319docx

EEC ORIGINAL PKG

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

October 17, 2019

RECEIVED
OCT 17 2019
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

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

SUBJECT: Comments on the September 2019 Air Quality/Greenhouse Gas Study for General Plan Amendment 19-0002, Zone Change 19-0003 and Conditional Use Permit 19-0013—Park-N-Stor, LLC (West Wind Parking Storage Project)

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review and comment on the Air Quality/Greenhouse Gas Study for the General Plan Amendment (GPA) 19-0002, Zone Change (ZC) 19-0003, and Conditional Use Permit (CUP) 19-0013 for the West Wind Parking Storage Project.

Upon review of the September 2019 Air Quality/Greenhouse Gas Study, the Air District finds that the applicant has addressed a number of concerns expressed by the Air District in earlier drafts of the project, such as the use of the 2012 ICAPCD CEQA Handbook. Additionally, the default of 6 (six) acres per day of grading is used in the CalEEMod analysis and is now part of AQ-1a mitigation measures. The Air District asks that the proposed mitigation measures contained in the September 2019 Air Quality/Greenhouse Gas Study be placed as conditions within the CUP. Finally, the Air District politely requests a Draft copy of the CUP prior to recording.

Air District rules and regulations can be found on our website at https://www.co.imperial.ca.us/AirPollution. Please feel free to contact the Air District at (442) 265-1800 should you have any questions.

Respectfully,
Curtis Blondell
Curtis Blondell
Environmental Coordinator

Monica N. Soucier
APC Division Manager

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

September 6, 2019

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

SUBJECT: Air Quality/Greenhouse Gas Study: General Plan Amendment 19-0002, Zone Change 19-0003 and Conditional Use Permit 19-0013—Park-N-Stor, LLC.

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review and comment on the Air Quality/Greenhouse Gas Study for the General Plan Amendment (GPA) 19-0002, Zone Change (ZC) 19-0003, and Conditional Use Permit (CUP) 19-0013 for the West Wind Parking Storage Project. Overall, the Air Study lacks sufficient information as to fall below the standard of adequacy as described within the CEQA Guideline policy § 15003(i), which states that "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure...."

The following only addresses those issues that are significant enough to cause the Air District not to concur with an adequacy or completeness standard as there may be other non-substantive issues or administrative issues.

First, the consulting group used the 2007 version of the Imperial County CEQA Air Quality Handbook. All operational thresholds were amended during the 2012 revision. Second, the CalEEMod analysis and ultimate findings were based on modifications to the model that are inconsistent with general acceptable practices. For example, the following default values were changed that would trigger, by the very nature of the change would lower values or resulting emissions. The model original input assumptions and the description indicated that the analysis would be conducted on the whole of the additional 20 acres. As an example, using the grading phase of the project, we will illustrate the type of change that is concerning.

- The default value for a 20 acre grading process includes 2 excavators, 1 dozer, 1 grader, 2 tractors/loaders/backhoes and 2 scrapers

The grading phase tends to be the phase where the greatest amount of fugitive dust is emitted into the air. Therefore, the length or width of the grading is not what is important but the total area the will be disturbed. Grading requires multiple passes by each piece of equipment therefore the model by default will adjust calculations on the number of pieces of equipment, the number of days and the maximum number of acres. Thus the model assumption for this project used 2 disturbed acres per day effectively reducing the amount of emissions significantly.

To further illustrate the impact of the change of the default value to 2 acres per day. Just looking at the grading phase, a 2 acre site can finish in 4 days however the model shows that the number of days was changes to 30 days which implies that up to 20 acres can be graded at a rate of 7.5 acres per day not 2. In any event, the change in any default assumptions is not discouraged however there should be some reasonable attempt to remain realistic. Therefore, in this example a commitment in the document that the application would adhere, in a CUP condition let's say to only grading 2 acres per day would be permissible. The same would go with other mitigations selected in the model, which are, the use of soil stabilizers, replacing ground cover, watering 3 times a day including exposed areas, watering unpaved roads and reducing vehicle speed on unpaved roads. Without those commitments in writing the Air District is unable to find the analysis adequate.

Air District rules and regulations can be found on our website at (https://www.co.imperial.ca.us/AirPollution). Please feel free to contact the Air District at (442) 265-1800 should you have any questions.

Respectfully,

Monica N. Soucier
APC Division Manager

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

August 2, 2019

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

SUBJECT: Comments for Second Review: General Plan Amendment 19-0002, Zone Change 19-0003 and Conditional Use Permit 19-0013—Park-N-Stor, LLC.

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review and comment on General Plan Amendment (GPA) 19-0002, Zone Change (ZC) 19-0003, and Conditional Use Permit (CUP) 19-0013 which collectively will allow for a trucking storage facility near East Heber Road and Highway 111. GPA 19-0002 will allow for the expansion of the Heber Specific Plan Area on the General Plan Land Use Map to incorporate the existing industrial uses east of Highway 111 and south of Heber Road as well as the proposed parcel abutting the existing industrial use fronting Heber Road. ZC 19-0003 will convert the existing 20-acre A-2 Parcel (APN 054-240-023) to an M-1 Zone to allow for the expansion of the existing truck parking facility and the zone correction would be to take the existing two established industrial areas (APN 054—240-022) (6.42 acre) and APN 054-240-025 (20.1 acre) and convert to an M-1 Light Industrial Zone. CUP 19-0013 will allow the expansion of the existing industrial use onto APN 054-240-023.

Upon review, it is unclear if the proposed project will fall under Tier 1 or Tier 2 Thresholds of Significance for Project Operations as outlined in Table 1 and discussed in Section 5.1—Motor Vehicle Emissions in the Air District's CEQA Air Quality Handbook. Due to the proposed expansion of the parking facility and the potential impact of additional emissions, the Air District asks that the applicant perform a preliminary calculation of vehicle emissions, including the number of trucks utilizing the proposed facility. Based on the outcome of the analysis, the applicant can then

apply those measures found in Section 7 of the Air District's CEQA Handbook to mitigate emissions. Additionally, if any generators greater than 50 horsepower are to be used on the site during operations or construction, the applicant will need to contact the Engineering & Permitting Division of the Air District to obtain the necessary permits.

Finally, the Air District requests a copy of the Draft CUP prior to recording.

Air District rules and regulations can be found on our website at (https://www.co.imperial.ca.us/AirPollution). Please feel free to contact the Air District at (442) 265-1800 should you have any questions.

Respectfully,

Curtis Blondell

Curtis Blondell
APC Environmental Coordinator

Reviewed by Monica Soucier
APC Division Manager

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

July 19, 2019

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

SUBJECT: General Plan Amendment 19-0002, Zone Change 19-0003 and Conditional Use Permit 19-0013—Park-N-Stor, LLC.

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review and comment on General Plan Amendment (GPA) 19-0002, Zone Change (ZC) 19-0003, and Conditional Use Permit (CUP) 19-0013 which collectively will allow for a trucking storage facility near East Heber Road and Highway 111. GPA 19-0002 will allow for the expansion of the Heber Specific Plan Area on the General Plan Land Use Map to incorporate the existing industrial uses east of Highway 111 and south of Heber Road as well as the proposed parcel abutting the existing industrial use fronting Heber Road. ZC 19-0003 will convert the existing 20-acre A-2 Parcel (APN 054-240-023) to an M-1 Zone to allow for the expansion of the existing truck parking facility and the zone correction would be to take the existing two established industrial areas (APN 054—240-022) (6.42 acre) and APN 054-240-025 (20.1 acre) and convert to an M-1 Light Industrial Zone. CUP 19-0013 will allow the expansion of the existing industrial use onto APN 054-240-023.

Upon review, it is unclear if the proposed project will fall under Tier 1 or Tier 2 Thresholds of Significance for Project Operations as outlined in Table 1 and discussed in Section 5.1—Motor Vehicle Emissions in the Air District's CEQA Air Quality Handbook. Due to the proposed expansion of the parking facility and the potential impact of additional emissions, the Air District asks that the applicant perform a preliminary calculation of vehicle emissions, including the number of trucks utilizing the proposed facility. Based on the outcome of the analysis, the applicant can then

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

S:\AllUsers\APN\054\240\022\GPA19-0002\EEC\CUP19-0013 INITIAL STUDY .docx

MITIGATION, MONTORING AND REPORTING PROGRAM

DRAFT MITIGATION MEASURES
PURSUANT TO THE ENVIRONMENTAL EVALUATION COMMITTEE
August 27, 2020
West Wind Parking Storage, Inc.
[GPA #19-0002, ZC #19-0003 & CUP #19-0012]

(APN 054-240-022-000)

(CEQA – Mitigated Negative Declaration)

Pursuant to the review and recommendations of the Imperial County Environmental Evaluation Committee (EEC) on August 27, 2020, the following Mitigation Measures are hereby proposed for the project:

AGRICULTURE:

Mitigation MM AFR-1. The Applicant shall pay an "Agriculture In-Lieu Mitigation Fee" in the amount of 30% of the fair market value per acre for the 20 acre based on five (5) comparable sales of land used for agriculture purposes be collected prior to the commencement of work. The Agriculture In-Lieu Mitigation Fee shall be placed in a trust account administered by the Imperial County Agriculture Commissioner's Office and will be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural land within Imperial County.

(Monitoring Agency: Imperial County Agriculture Commissioner's Office/Planning & Development Services Department)

AIR QUALITY:

MM-AQ1a: Prior to commencing construction, the project applicant will be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM10 emission and associated mitigation measures during the construction (see Rule 801 F.2.). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standards for dust control:

- All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or greater silt content.
- All on-site unpaved roads segments or areas use for hauling materials shall be effectively stabilized. Visible emission shall be limited to no greater than 20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering.
- The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.
- All track-out or carry-out on paved public roads, which include bulk materials adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line except where such material or activity is exempted from stabilization by the rules of ICAPCD.
- No more than 6 acres of surface area should be disturbed during any one day period and the delivery of surface materials, including asphalt grinding, should be limited to approximately 27 trucks trips daily (assuming 20 yards per truck) over a 30 day period to overlap with site grading operations.

MM-AQ-1b: Each project proponent shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions contained in the imperial County DEQA Air Quality Handbook and associated regulations. These measures include:

- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment shall meet U.S. tier standards.
- Minimize idling time, by either shutting equipment off when not in use or reducing the time or idling to five minutes at a maximum.
- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.
- Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts.

(Monitoring Agency: Imperial County Air Pollution Control District/Planning & Development Services Department)

S:\AllUsers\APN\054\240\022\GPA19-0002\EEC\MM&RP 08272020.docx

APPLICATION SUBMITTAL

EEC ORIGINAL PKG

DUBOSE DESIGN GROUP

email@dubosedesigngroup.com
dubosedesigngroup.com

6/4/2019

WEST WIND PARKING STORGE
(Zone Change/GPA/CUP): FREIGHT STORAGE

Applicant: WEST WIND PARKING STORAGE, INC

Property Owner: PARK-N-STOR, LLC

Planning: DUBOSE DESIGN GROUP, INC.

Location: The site is located just east of the Townsite of Heber, Imperial County, California, at the intersection of Heber Rd./HWY 111. Latitude and Longitude are 32°43'43.87" N and 115°29'51.33" W, respectfully.

Project Size: 57.43 +/- acres

APNs: 054-240-022
054-240-023
054-240-024
054-240-025

REQUIRED ACTIONS FOR EACH PARCEL:

Zone Change: APN: 054-240-022, -023, -025
General Plan Amendment: 054-240-022, -023, -024, -025
Conditional Use Permit: 054-240-023

EXISTING ZONING & LAND USE:

APN:	ACRES	Current Zoning	Current Land-Use[1]
054-240-022	20.01	**C2N-SPA**: Medium Commercial Non-Residential / Specific Plan Area	Agriculture
054-240-023	20	**A-2**: General Agriculture	Agriculture
054-240-024	11	**M-1-N-SPA**: Light Industrial Non-Residential / Specific Plan Area	Agriculture
054-240-025	6.42	**C2N-SPA**: Medium Commercial Non-Residential / Specific Plan Area	Agriculture

PROPOSED ZONING & LAND USE:

APN:	ACRES	Proposed Zoning	Proposed Land-Use
054-240-022	20.01	M-1: Light Industrial	Industrial
054-240-023	20	M-1: Light Industrial	Industrial
054-240-024	11	M-1: Light Industrial	Industrial
054-240-025	6.42	M-1: Light Industrial	Industrial

[1] The current use of the land for APNs: 054-240-022, -024, -025 is for freight storage while APN: 054-240-023 is being used for agriculture. A Conditional Use Permit will be applied for APN: 054-240-023.

DUBOSE
DESIGN
GROUP

email@dubosedesigngroup.com
dubosedesigngroup.com

Project Summary:

The Applicant is applying for multiple discretionary approvals with the County of Imperial including Zone Change, General Plan Amendment and Conditional Use Permit (CUP) in order to allow for an expansion of an additional 20 +/- acres (APN: 054-240-023). While all APNs will receive either a Zoning Change and/or Land Use alteration, APN 054-240-023 will be the only parcel receiving a CUP. Please refer to the tables above regarding the proposed zoning and land use alterations. Additionally, the proposed change of zoning will allow for a consistent land use policy within the overall facility area.

West Wind Parking Storage, Inc (Applicant) currently operates a freight storage facility at the southeast intersection of HWY 111 & Heber Rd. The facility houses numerous trucking companies that deliver and store freight (Dry Boxes and Sea Freight Containers) on-site. Currently, the facility is running out of available space. The West Wind Parking Storage is proposing to expand their footprint to avoid potential accidents and to accommodate an increased need for storage of containers coming from Mexico.

Proposed Development:

The development of the expansion will be done in phases depending on the pace of increased business. Phase 1 will include laying down asphalt grindings to an area of approximately 5.9 acres. The proposed Zone Change will change the zoning of that portion of the existing operation under the C-2 zone to M-1 zone (Light Industrial) and will also change the 20 +/- acres currently zoned A-2 to M-1. A CUP will be applied to APN: 054-240-023.

The Project Site:

APNs: 054-240-022, -024, -023, -025 are currently situated on approximately 57.43 +/- acres of land located within the County of Imperial, approximately one (1) mile east of the Townsite of Heber and approximately 2 miles north of the City of Calexico. The majority of the land has been previously disturbed by current operations of the applicant's trucking firm. However, 20 acres located to the east, situated on APN: 054-240-023, is vacant agricultural farm land which has been geographically separated from neighboring farmland by the Alder Drain to the East, a private canal to the south, East Heber Road to the North and the existing West Wind facility to the West.

Project Circulation:

Access to and from the existing facility is via two driveways. These driveways are located approximately 800 feet east from the intersection of Heber Rd. and HWY 111. The western driveway is used as ingress where trucks enter off of Heber Rd. into the facility. The eastern driveway is used for egress, where truck depart from on their way to their final destination. Once trucks have entered the facility site, they drive approximately 400 feet inside where they are met by an office. When given approval by staff, they are then allowed to drive further into the site and unload their freight.

A new entrance will be constructed and aligned with Yourman Road (East) to allow compatibility with imperial County's planned signalized intersection and access to the current facility and to the proposed

email@dubosedesigngroup.com
dubosedesigngroup.com

expansion area. The existing entrance/exit to the facility will be converted to emergency access only. This proposed intersection light will allow for a safe and efficient flow of increased traffic in the area.

Construction Activities:

The applicant will develop a grading plan and a retention basin for capturing stormwater run-off. The applicant intends to utilize recycled asphalt for parking on the storage expansion area. This recycled asphalt, given to the applicant by Caltrans through their HWY 111 rehabilitation project will be 6-8 inches thick and would allow for an all-weather driving surface. In the future the applicant may want to install lighting for the expanded portion.

DUBOSE
DESIGN
GROUP

email@dubosedesigngroup.com
dubosedesigngroup.com

6/28/2019

WEST WIND PARKING STORGE
FREIGHT STORAGE: GPA

Applicant: WEST WIND PARKING STORAGE, INC

Property Owner: PARK-N-STOR, LLC

Planning: DUBOSE DESIGN GROUP, INC.

Location: The site is located just east of the Townsite of Heber, Imperial County, California, at the intersection of Heber Rd./HWY 111. Latitude and Longitude are 32°43'43.87" N and 115°29'51.33" W, respectfully.

Project Size: 57.43 +/- acres

APNs:
054-240-022
054-240-023
054-240-024
054-240-025

This is a Letter of REQUEST for a General Plan Amendment to the County of Imperial Planning & Development Services (ICPDS).

The General Plan Amendment will be applied to APNs: 054-240-022, -023, -024, -025 due to the fact that these APNs have a land use designation of Agriculture. The proposed Zone Change will change the zoning of APNs: 054-240-022, -023, -025 to Light Industrial, which is not consistent with the Land Use Element Compatibility Matrix, hence why the General Plan Amendment is needed. APN: 054-240-024 is already zoned Light Industrial, this General Plan Amendment will bring this parcel into conformance.

Thank you,

Annette Leon
Vice-President, DuBose Design Group

CHANGE OF ZONE

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

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

1. PROPERTY OWNER'S NAME PARK-N-STOR, LLC		EMAIL ADDRESS jaime@westwindparking.com/ tom@dubosedesigngroup.com matthew@dubosedesigngroup.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 1065 State Street, El Centro, CA		ZIP CODE 92243	PHONE NUMBER 760-353-8110
3. ENGINEER'S NAME LC Engineering Consultant, Inc.	CA. LICENSE NO. 55432	EMAIL ADDRESS carloscorrales@dde-inc.net/ tom@dubosedesigngroup.com matthew@dubosedesigngroup.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 1065 State Street, El Centro, CA		ZIP CODE 92243	PHONE NUMBER 760-353-8110

5. ASSESSOR'S PARCEL NO. 054-240-022, -023,-025	ZONING (existing) C-2-N-SPA, A-2, C-2-N-SPA	ZONING (proposed) M-1
6. PROPERTY (site) ADDRESS Please reference Assessor's Parcel No.		SIZE OF PROPERTY (in acres or square foot) 46.43 +/- acres

7. GENERAL LOCATION (i.e. city, town, cross street)
Project site is located approx. 1 mile east of the Township of Heber and approximately 2 miles north of City of Calexico. Near the intesection of Heber Rd./HWY 111

8. LEGAL DESCRIPTION Please reference attached Legal Description

8. DESCRIBE CURRENT USE ON / OF PROPERTY (list and describe in detail) Please reference Project Description

9. PLEASE STATE REASON FOR PROPOSED USE (be specific) Applicant wishes to rezone property in order to bring it into conformance and to allow for expansion into neighboring parcel for a trucking storage facility.

10. DESCRIBE SURROUNDING PROPERTY USES Surrounding property uses are Agricultural to the East and South. The Imperial Center Specific Plan Area lies to the North and Specific Plan Area to the West.

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

Jaime Tamayo — Print Name
10-23-18 — Date
Signature

REQUIRED SUPPORT DOCUMENTS

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

APPLICATION RECEIVED BY:	MM	DATE	10/24/2018
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

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

ZC # 19-0003

EEC ORIGINAL PKG

DUBOSE DESIGN GROUP

email@dubosedesigngroup.com
dubosedesigngroup.com

6/4/2019

WEST WIND PARKING STORGE
FREIGHT STORAGE: GPA

Applicant: WEST WIND PARKING STORAGE, INC

Property Owner: PARK-N-STOR, LLC

Planning: DUBOSE DESIGN GROUP, INC.

Location: The site is located just east of the Townsite of Heber, Imperial County, California, at the intersection of Heber Rd./HWY 111. Latitude and Longitude are 32°43'43.87" N and 115°29'51.33" W, respectfully.

Project Size: 57.43 +/- acres

APNs:
054-240-022
054-240-023
054-240-024
054-240-025

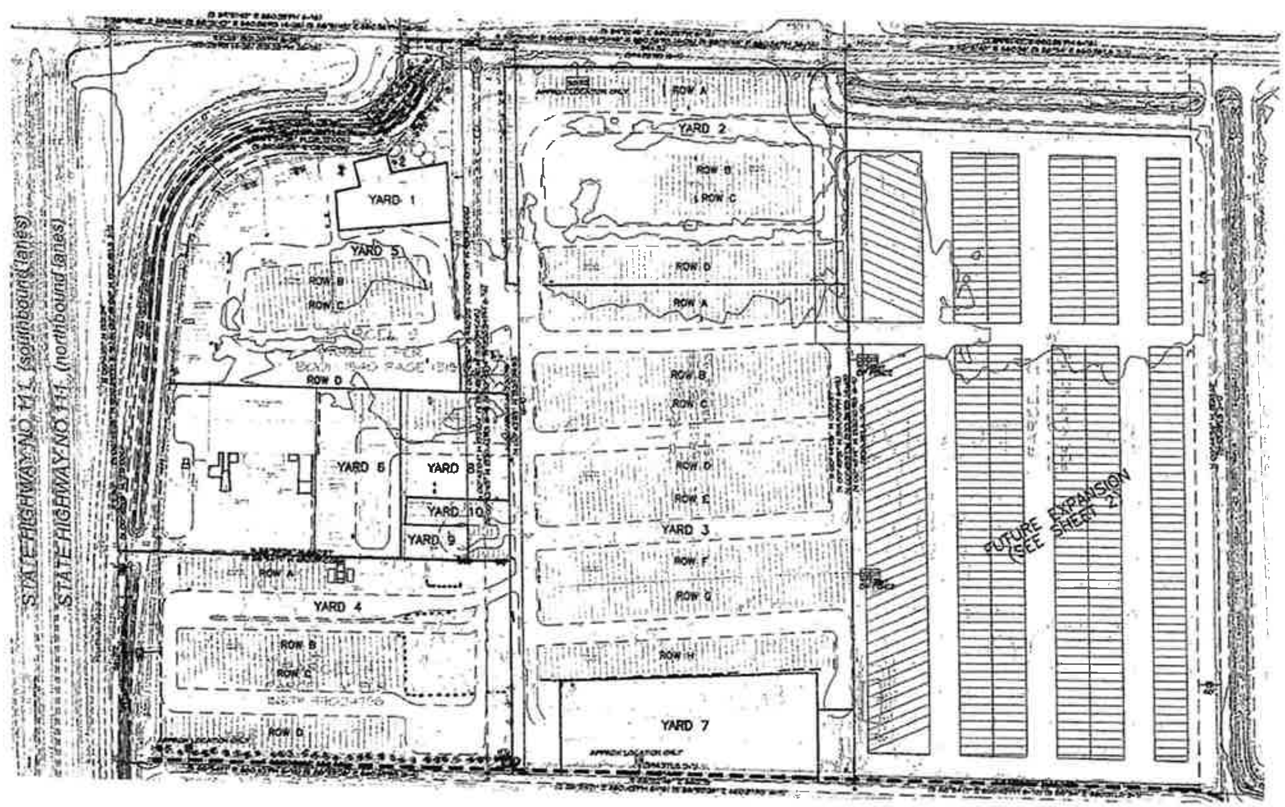
On 5/28/2019, DuBose Design Group had submitted on behalf of our client, West Wind Parking Storage, Inc. (Applicant) applications for both a Zone Change and General Plan Amendment. This letter is intended to provide the County of Imperial Planning & Development Services (ICPDS) notification that the applicant has submitted a General Plan Amendment. Additionally, it is now understood that client must also apply for a Conditional Use Permit for APN: 054-240-023.

The General Plan Amendment will be applied to APNs: 054-240-022, -023, -024, -025 due to the fact that these APNs have a land use designation of Agriculture. The proposed Zone Change will change the zoning of APNs: 054-240-022, -023, -025 to Light Industrial, which is not consistent with the Land Use Element Compatibility Matrix, hence why the General Plan Amendment. APN: 054-240-024 is already zoned Light Industrial, this General Plan Amendment will bring this parcel into conformance.

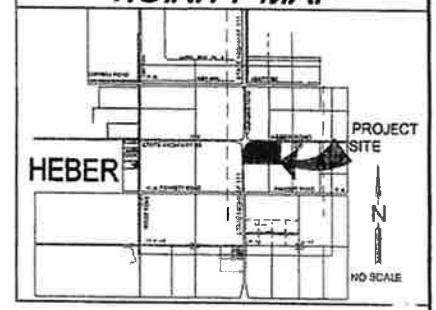
Thank you,

Annette Leon
Vice-President, DuBose Design Group

WESTWIND PARKING STORAGE EXPANSION



VICINITY MAP



LEGAL DESCRIPTIONS:

PARCEL 1:

PARCEL 2 OF PARCEL MAP NO. M-1514, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP ON FILE IN BOOK 6, PAGE 16 OF PARCEL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY

EXCEPTING THEREFROM WEST 60 FEET THEREOF.

SAID LAND IS ALSO SHOWN AS PARCEL B OF THAT CERTAIN CERTIFICATE OF COMPLIANCE LOT LINE ADJUSTMENT [illegible] RECORDED NOVEMBER 10, 1998 AS DOCUMENT NO. 98024756 IN BOOK 1998, PAGE 1192 OF OFFICIAL RECORDS.
(054-240-032-000)

PARCEL 2:

LOT 4 OF THE SUBDIVISION OF TRACT 40, TOWNSHIP 16 SOUTH, RANGE 14 EAST, SBM, IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL STATE OF CALIFORNIA, AS PER MAP NO. 361 ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY
(054-240-035-000)

PARCEL 3:

THAT PORTION OF LOT 5 OF THE SUBDIVISION OF TRACT 40, ACCORDING TO MAP RECORDED IN BOOK 2, PAGE 1 OF LICENSED SURVEYS, TOWNSHIP 16 SOUTH, RANGE 14 EAST, SBM, IN THE COUNTY OF IMPERIAL, STATE OF CALIFORNIA, BEING ALSO THAT PORTION OF PARCEL 1, ACCORDING TO MAP NO. M-1514, RECORDED IN BOOK 6, PAGE 16 OF PARCEL MAPS, ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID PARCEL 1 OF PARCEL MAP M-1514, THENCE ALONG THE WEST LINE OF SAID PARCEL 1 [illegible]

SAID LAND IS ALSO SHOWN AS PARCEL 1 OF THAT CERTAIN CERTIFICATE OF COMPLIANCE [illegible] RECORDED MAY [illegible] AS FILE NO. [illegible] IN BOOK 1540, PAGE [illegible] OF OFFICIAL RECORDS. (054-240-024-000)

PARCEL 4:

PARCEL 2 OF CERTIFICATE OF COMPLIANCE M-1656 RECORDED 18 MAY 1983 IN BOOK 1540, PAGE 1319 OF OFFICIAL RECORDS OF IMPERIAL COUNTY, CALIFORNIA.

IN ADDITION THERETO THE WEST 60 FEET OF PARCEL 2 OF PARCEL MAP NO. M-1514 ON FILE IN BOOK 6, PAGE 16 OF PARCEL MAPS IN THE OFFICE OF THE IMPERIAL COUNTY RECORDER.
(054-240-033-000)

SAID LAND IS ALSO SHOWN AS PARCEL A OF THAT CERTAIN CERTIFICATE OF COMPLIANCE LOT LINE ADJUSTMENT [illegible] RECORDED NOVEMBER 10, 1998 AS DOCUMENT NO. 98024756 IN BOOK 1998, PAGE 1192 OF OFFICIAL RECORDS

BASIS OF BEARINGS:

[illegible]

OWNER/DEV.

WEST WIND PARKING STORAGE, INC.
ADDRESS: SE INTERSECTION OF HEBER RD/HWY 111
HEBER, CA 92249

ENGINEER:

LC ENGINEERING CONSULTANTS INC
1065 STATE STREET
EL CENTRO, CA 92243

PARKING:

FUTURE EXPANSION - NEW

15 X 60 - 345 SPACES
15 X 120 - 40 SPACES

EASEMENTS:

[illegible] AN EASEMENT FOR [illegible] COUNTY ROAD RECORDED IN BOOK [illegible], PAGE [illegible] OFFICIAL RECORDS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD.)

[9] [illegible] EASEMENT(S) GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR LATERAL [illegible] TELEPHONE AND POWER LINE WITH RIGHTS OF INGRESS AND EGRESS RECORDED [illegible] IN BOOK [illegible], PAGE [illegible] OF OFFICIAL RECORDS.
(SAID EASEMENT IS PLOTTED HEREON)

[illegible] EASEMENT(S) GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR CANAL, TELEPHONE AND ELECTRIC POWER LINES WITH ACCESS THERETO RECORDED APRIL 10, 1948 IN BOOK [illegible], PAGE [illegible] OF OFFICIAL RECORDS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD.)

[illegible] EASEMENT(S) FOR THE PURPOSE(S) GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR CANAL, TELEPHONE AND/OR ELECTRIC POWER LINE OR LINES RECORDED MAY 2, 1955 IN BOOK [illegible], PAGE [illegible] OF OFFICIAL RECORDS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD.)

[12] [illegible] EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS GRANTED IN A DOCUMENT [illegible] IMPERIAL IRRIGATION DISTRICT [illegible]
(SAID EASEMENT IS PLOTTED HEREON)

[15] [illegible] AN EASEMENT REFERENCED IN AGREEMENT ENTITLED "AGREEMENT BETWEEN [illegible]" RECORDED NOVEMBER [illegible] AS FILE NO. [illegible] IN BOOK [illegible], PAGE [illegible] OFFICIAL RECORDS.
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. THE APPROXIMATE LOCATION ONLY IS PLOTTED. SEE SAID DOCUMENT FOR FULL DETAILS.)

[16] [illegible] EASEMENT(S) FOR THE PURPOSE(S) AS GRANTED TO COUNTY OF IMPERIAL FOR PUBLIC HIGHWAY RECORDED NOVEMBER [illegible] AS FILE NO. 22, IN BOOK 1551, PAGE [illegible] OF OFFICIAL RECORDS.
(SAID EASEMENT IS PLOTTED HEREON)

[22] [illegible] EASEMENT(S) FOR THE PURPOSE(S) AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR CONSTRUCTING, OPERATING, AND MAINTAINING A POWER LINE OR LINES [illegible]
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. THE APPROXIMATE LOCATION ONLY IS PLOTTED. SEE SAID DOCUMENT FOR FULL DETAILS.)

[23] [illegible] EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS GRANTED TO IMPERIAL IRRIGATION DISTRICT FOR CONSTRUCTING, OPERATING AND MAINTAINING A POWER LINE OR LINES [illegible]
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. THE APPROXIMATE LOCATION ONLY IS PLOTTED. SEE SAID DOCUMENT FOR FULL DETAILS.)

[30] [illegible] EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS GRANTED TO IMPERIAL IRRIGATION DISTRICT [illegible]
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. THE APPROXIMATE LOCATION ONLY IS PLOTTED. SEE SAID DOCUMENT FOR FULL DETAILS.)

[32] [illegible] EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS GRANTED TO IMPERIAL IRRIGATION DISTRICT [illegible]
(THE EXACT EXTENT AND LOCATION OF SAID EASEMENT CANNOT BE DETERMINED FROM THE RECORD. THE APPROXIMATE LOCATION ONLY IS PLOTTED. SEE SAID DOCUMENT FOR FULL DETAILS.)

GRAPHIC SCALE

UNDERGROUND SERVICE ALERT
CALL: TOLL FREE
811
TWO WORKING DAYS BEFORE YOU DIG

NO.	REVISIONS	BY	DATE

APPROVED BY ACTING CITY ENGINEER
COUNTY OF IMPERIAL, CA
BY: ______ DATE: ______
R.C.E. NO.: ______

SEAL

ENGINEER OF RECORD
PLANS PREPARED UNDER THE SUPERVISION OF
BY: ______ DATE: ______
CARLOS CORRALES
R.C.E. NO.: 35433

LC ENGINEERING CONSULTANTS INC.
1065 State Street
El Centro CA 92243

DATE: 3/18/19
BENCHMARK: SEE SHEET NO. 1

SITE PLAN EXISTING CONDITIONS
WEST WIND
PARKING STORAGE
EXPANSION
CLIENT: WEST WIND PARKING STORAGE, INC.

SHEET 1 OF 2 SHEETS
JOB NO. C18080-00

03/21/2019 13:36

EEC ORIGINAL PKG

CONDITIONAL USE PERMIT

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

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

1.	PROPERTY OWNER'S NAME PARK-N-STOR,LLC	EMAIL ADDRESS tom@dubosedesigngroup.com, matthew@dubosedesigngroup.com	
2.	MAILING ADDRESS (Street / P O Box, City, State) 7197 Aviara Dr., Carlsbad, CA	ZIP CODE 92011-4901	PHONE NUMBER 760-353-8110
3.	APPLICANT'S NAME West Wind Parking Storage, Inc.	EMAIL ADDRESS jaime@westwindparking.com	
4.	MAILING ADDRESS (Street / P O Box, City, State) P.O. BOX 1545, Heber, CA	ZIP CODE 92249	PHONE NUMBER 760-353-8110
4.	ENGINEER'S NAME LC ENGINEERING CONSULTANT, INC. CA. LICENSE NO. 55432	EMAIL ADDRESS carloscorrales@dde-inc.net, tom@dubosedesigngroup.com, matthew@dubosedesigngroup.com	
5.	MAILING ADDRESS (Street / P O Box, City, State) 1065 State Street, El Centro, CA 92243	ZIP CODE 92243	PHONE NUMBER 760-353-8110

6. ASSESSOR'S PARCEL NO. 054-240-023	SIZE OF PROPERTY (in acres or square foot) 20 +/- acres	ZONING (existing) M-H A-2

M.H. 6/4/19

7. PROPERTY (site) ADDRESS
Please reference Assessor's Parcel Numbers

8. GENERAL LOCATION (i.e. city, town, cross street)
Project site is located approx. 1 mile east of the Township of Heber and approximately 2 miles north of City of Calexico. Near the intesection of Heber Rd./HWY 111

9. LEGAL DESCRIPTION Please reference attached Legal Description

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail) Applicant would like to expand their current operations to their neighboring parcel located on 054-240-023.

11. DESCRIBE CURRENT USE OF PROPERTY Land is currently vacant agricultural land

12. DESCRIBE PROPOSED SEWER SYSTEM Septic Tank System

13. DESCRIBE PROPOSED WATER SYSTEM Water is trucked in

14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM This site will comply with appropriate fire regulations

15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? There are approximately 15 employees working at current facility.

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

Jaime Tamayo — 10-31-18
Print Name — Date

Signature

Print Name — Date

Signature

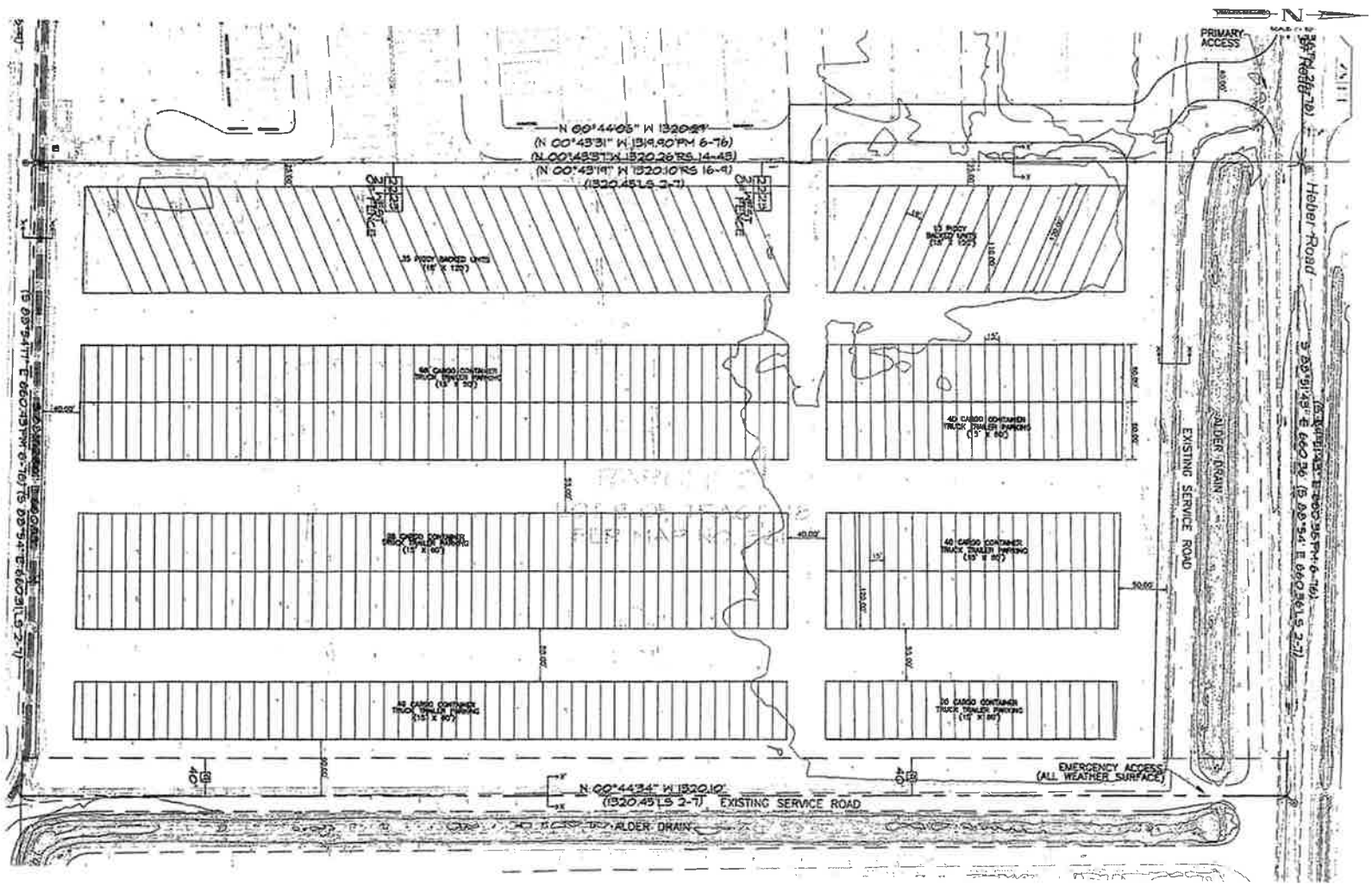
REQUIRED SUPPORT DOCUMENTS

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

APPLICATION RECEIVED BY:	JH	DATE	6/6/19	REVIEW / APPROVAL BY OTHER DEPT'S required. ☐ P. W. ☐ E. H. S. ☐ A. P. C. D. ☐ O. E. S. ☐ ____ ☐ ____
APPLICATION DEEMED COMPLETE BY:		DATE		
APPLICATION REJECTED BY:		DATE		
TENTATIVE HEARING BY:		DATE		
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE		

CUP # 19-0013

EEC ORIGINAL PKG



DRAINAGE:

A) RETENTION BASIN (STORAGE REQUIRED)
RETENTION BASIN DESIGN TO STORE 100% OF A 100 YEAR STORM (3 INCHES OF RAIN) FOR THE 20 AC EXPANSION PARCEL (THE WHOLE 30 AC PARCEL TO BE USED TO RETAIN STORM RUN OFF ON-SITE)

Q=CIA

C=RUNOFF COEFFICIENT (1.0)

I=RAINFALL INTENSITY (3.0)

A=BASIN AREA (12.81 AC)

Q=1 X 3/12 X 20.00 = 5.00 AC-FT

B) RETENTION BASIN (STORAGE PROVIDED)

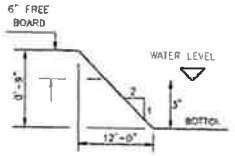
TOP OF WATER AREA = 20 AC

BOTTOM AREA= 20 AC

AVERAGE= 20 AC

DEPTH= 0.25 FEET

VOL= 5 AC-FT



SECTION X-X'
RETENTION BASIN SECTION

GRAPHIC SCALE

UNDERGROUND SERVICE ALERT
CALL: TOLL FREE 811
TWO WORKING DAYS BEFORE YOU DIG

NO.	REVISIONS	BY	DATE

APPROVED BY ACTING CITY ENGINEER
COUNTY OF IMPERIAL, CA.
BY: _____ DATE: _____
R.C.E. NO.: _____

SEAL

ENGINEER OF RECORD
PLANS PREPARED UNDER THE SUPERVISION OF
BY: _____ DATE: _____
CARLOS CORRALES
R.C.E. NO.: 55432

SEAL
No. 55432
Exp. 12-31-20
Civil
STATE OF CALIFORNIA

LC ENGINEERING CONSULTANTS INC.
1065 State Street
El Centro CA 92243

DATE: 3/18/19 BENCHMARK: SEE SHEET NO. 1

SITE PLAN (FUTURE EXPANSION)
WEST WIND
PARKING STORAGE EXPANSION
CLIENT: WEST WIND PARKING STORAGE, INC.

SHEET 2 OF 2 SHEETS
JOB NO. C16080-00

EEC ORIGINAL PKG

EEC ORIGINAL PKG

WEST WIND PARKING STORAGE PROJECT

AIR QUALITY/GREENHOUSE GAS STUDY

Prepared for:

Dubose Design Group

Prepared by:

BPG
BIRDSEYE
PLANNING GROUP

September 2019

WEST WIND PARKING STORAGE PROJECT
IMPERIAL COUNTY, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

Table of Contents

Page

List of Figures

List of Tables

Appendices

WEST WIND PARKING STORAGE PROJECT IMPERIAL COUNTY, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

This report is an analysis of the potential air quality and greenhouse gas impacts associated with the proposed West Wind Parking Storage Project in unincorporated Imperial County. This report has been prepared by Birdseye Planning Group (BPG) under contract to the applicant and Dubose Design Group to support preparation of the environmental documentation pursuant to the California Environmental Quality Act (CEQA). This study evaluates the the potential for temporary construction and long-term operation impacts associated with use of the project site for freight storage.

PROJECT DESCRIPTION

The applicant currently operates a freight storage facility on a 37.43-acre site located southeast of the Highway 111 and East Heber Road intersection. The facility supports multiple trucking companies that deliver and store freight (dry boxes and sea freight containers) on-site. The existing facility is reaching capacity; thus, the applicant is proposing to expand the footprint onto the adjacent 20-acre parcel to improve safety of the overall facility and accommodate increased demand for the storage of containers coming from Mexico.

The applicant has applied for multiple discretionary approvals with the County of Imperial including a Zone Change, General Plan Amendment and Conditional Use Permit (CUP). The existing facility operates on Assessor Parcel Numbers 054-240-022, -024, and -025 which comprises approximately 37.43 acres. Parcels 054-240-022 (20.01 acres) and 054-240-025 (6.42 acres) are both zoned Medium Commercial Non-Residential/Specific Plan Area (C2N-SPA). Parcel 054-240-024 (11 acres) is zoned Light Industrial Non-Residential/Specific Plan Area (M-1-N-SPA). The adjacent 20-acre parcel (APN 054-240-023) is zoned General Agricultural (A-2). The proposed rezone would change the zoning for all parcels comprising the project to Light Industrial (M-1). The GPA would change the land use designation on all parcels from Agriculture to Industrial. Thus, the zoning and General Plan land use designation would be consistent across the subject parcels. The CUP will only apply to the 20-acre parcel (054-240-023). The 20-acre parcel is vacant and has historically been part of a neighboring family agricultural operation (see Figure 1). At completion, the freight storage facility would cover 57.43 acres.

The proposed expansion will be performed in phases depending on market demand. Phase 1 will be performed after project approval and include scraping and compacting the soil and laying down asphalt grindings on a 5.9-acre portion of the 20-acre site (see Figure 2). Further, the existing access which is located approximately 800 feet east of the East Heber Road/State Route 111 intersection will be relocated eastward to the East Heber Road / Yourman Road

Figure 1 — Vicinity Map

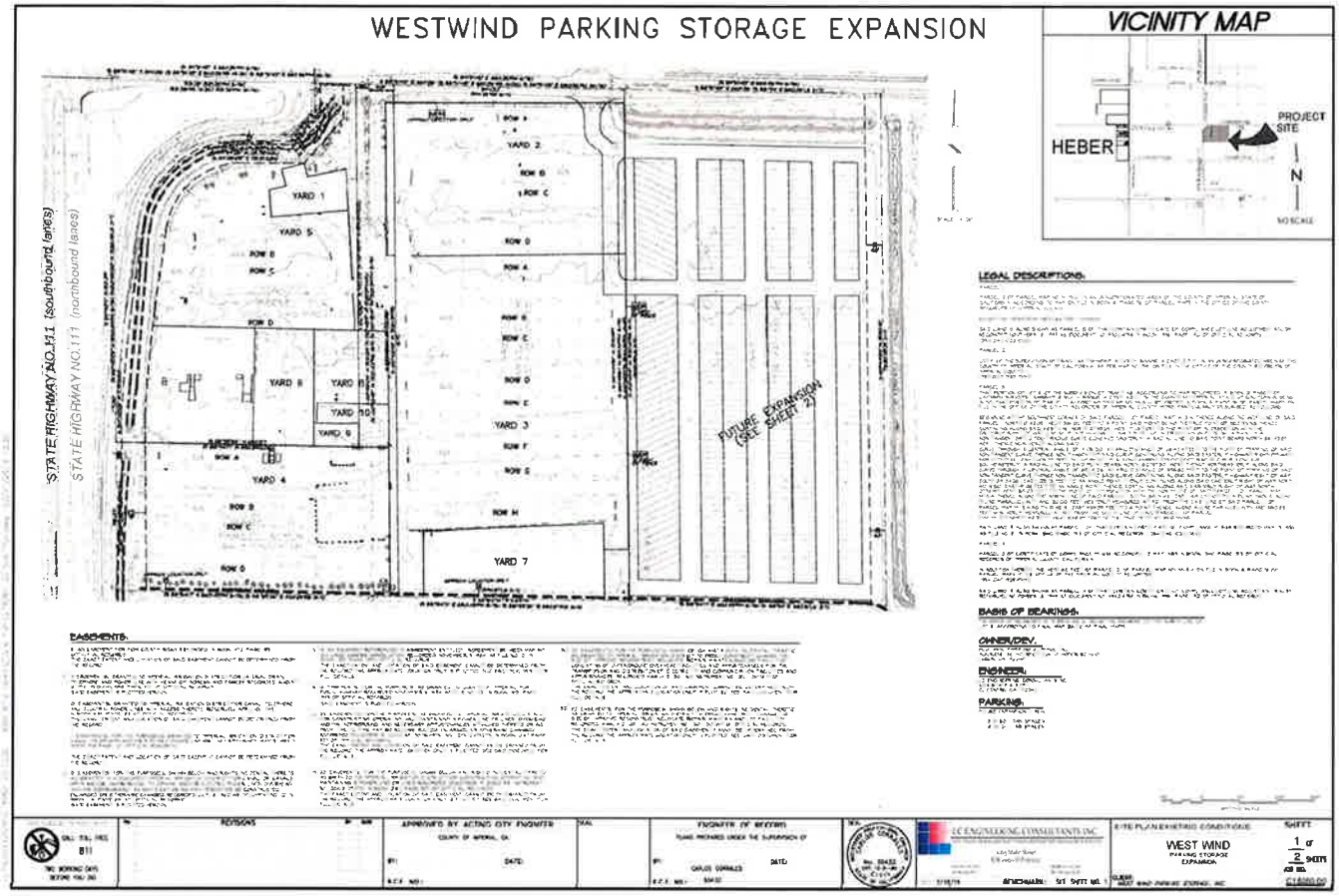


Figure 2 — Site Plan

intersection as the fourth leg (south leg). The existing driveway will be used for emergency access. Subsequent phases will involve the same construction process until the 20-acre site is developed. The proposed site plan is shown as Figure 2. As discussed in the Traffic Impact Analysis prepared by Linscott, Law and Greenspan (May 2019), the expansion project will generate approximately 168 average daily trips (ADT). Of the total, 160 vehicles would be truck trips and 8 would be employee trips. With the addition of project traffic, all study area intersections are calculated to continue to operate at LOS D or better. The project would not have an adverse impact on traffic operations.

SETTING

Air Pollution Regulation

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The EPA is the federal agency designated to administer air quality regulation, while the California Air Resources Board (ARB) is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb). California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Table 1 shows the current federal and state standards for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

Table 1 Ambient Air Quality Standards

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS[1]		NATIONAL STANDARDS[2]		
		Concentration[3]	Method[4]	Primary[3, 5]	Secondary[3, 6]	Method[7]
Ozone[8] (O_3)	1 hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 hours	0.070 ppm (137µg/m³)		0.070 ppm (137 µg/m³)		
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m³)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m³)	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
Nitrogen Dioxide (NO_2)[10]	Annual Average	0.030 ppm (57 µg/m³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (339 µg/m³)		100 ppb (188 µg/m³)	--	

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS[1]		NATIONAL STANDARDS[2]		
		Concentration[3]	Method[4]	Primary[3, 5]	Secondary[3, 6]	Method[7]
Sulfur Dioxide (SO_2)[11]	Annual Average	--	Ultraviolet Fluorescence	0.03 ppm (80 µg/m³)	--	Pararosaniline
	24 hours	0.04 ppm (105 µg/m³)		0.14 ppm (365 µg/m³)	--	
	3 hours	--		--	0.5 ppm (1300 µg/m³)	
	1 hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)	--	
Respirable Particulate Matter (PM_{10})[9]	24 hours	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	150 µg/m³	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--	--	
Fine Particulate Matter ($PM_{2.5}$)[9]	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12 µg/m³	15 µg/m³	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m³	Same as Primary Standard	
Sulfates	24 hours	25 µg/m³	Ion Chromatography	--	--	--
Lead[12, 13] (Pb)	30-day Average	1.5 µg/m³	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m³	Same as Primary Standard	
	3-month Rolling Average	--		0.15 µg/m³		
Hydrogen Sulfide (H_2S)	1 hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride[12]	24 hours	0.010 ppm (26 µg/m³)	Gas Chromatography	--	--	--

Notes:

ppm = parts per million
µg/m³ = micrograms per cubic meter
mg/m³ = milligrams per cubic meter
Source: California Air Resources Board 2017

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/ m^3$ to 12.0 $\mu g/ m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/ m^3$, as was the annual secondary standard of 15 $\mu g/ m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/ m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/ m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Local control in air quality management is provided by the ARB through county-level or regional (multi-county) Air Pollution Control Districts (APCDs). The ARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 14 air basins statewide. The project site is located within the Salton Sea Air Basin (Basin), which includes all of Imperial County and a portion of central Riverside County. Air quality conditions in the Imperial County portion of the Basin are under the jurisdiction of the Imperial County APCD (ICAPCD). The remainder in Riverside County is managed by the South Coast Air Quality Management District. The ICAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." Table 2 shows the attainment Salton Sea Air Basin attainment status for the national and state standards shown in Table 1.

Table 2
Imperial County Air Quality Standard Attainment Status

Pollutant	CAAQS	NAAQS
Ozone (O_3)	Nonattainment	Nonattainment - Moderate
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Respirable Particulate Matter (PM_{10})	Nonattainment	Nonattainment - Serious
Fine Particulate Matter ($PM_{2.5}$)(1)	Unclassified(2)	Nonattainment - Moderate
Nitrogen Dioxide (NO_2)	Attainment	Unclassified/Attainment
Lead (Pb)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Sulfates	Attainment	No Federal Standards
Vinyl Chloride	Unclassified	
Hydrogen Sulfide (H_2S)	Attainment	
Visibility Reducing Particles	Unclassified	

Source: County of Imperial, May 2019
[1] The portion of Imperial County in proximity to Calexico is designated nonattainment for the NAAQS. The nonattainment designation does not include the entire county.
[2] Insufficient data to designate area or designations have yet to be made

The Basin in which the project area is located, is designated non-attainment area for the federal and state standards for ozone and PM_{10}. The Basin is classified as a moderate nonattainment area for the federal $PM_{2.5}$ and either attainment or unclassified for the remaining pollutants. Characteristics of the pollutants referenced above are described below.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NOx) and reactive organic gases (ROG)[1]. Nitrogen oxides are formed during

[1] *Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, from an air quality perspective two groups are important: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC).*

the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide. Carbon monoxide is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Nitrogen Dioxide. Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_x. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates. PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads. The pollutants are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead (Pb). Lead is a naturally occurring metal used in a variety of industrial and commercial applications. Historically, the majority of lead emissions were attributed to automobiles using leaded gasoline. As leaded gasoline has been phased out of use, lead emissions have dropped dramatically, and current primary sources are ore processing and aircraft that use leaded aircraft fuel. Lead exposure has been associated with learning disabilities and behavioral problems in children, kidney damage, and negative effects on the nervous and cardiovascular systems.

Sulfur Dioxide (SO_2). SO_2 is one of several highly reactive gasses known as oxides of sulfur (SOx) and is formed by burning fuel containing sulfur. Typical sources include emissions from burning coal or oil at power plants and factories. Typical health effects associated with exposure to sulfur dioxide include respiratory illness and exacerbation of respiratory symptoms in people with asthma.

Sulfates. Sulfates are the fully oxidized ionic form of sulfur produced when sulfur dioxide is fully oxidized in the atmosphere. Sulfates are produced by emissions from automobiles, power plants, and industrial activity, and contribute to general atmospheric haziness. Typical health effects associated with exposure to sulfates include respiratory illness and an increased risk of cardio-pulmonary disease.

Vinyl Chloride. Vinyl chloride is an artificially created colorless gas with a mild, slightly sweet odor. The gas is used in the manufacture of vinyl products, including polyvinyl chloride (PVC) plastic. Vinyl chloride emissions are produced from the vinyl manufacturing process as well as from the breakdown of vinyl products in landfills and hazardous waste sites. The health effects associated with vinyl chloride include dizziness, headaches, and drowsiness from shortterm exposure, and liver damage and cancer resulting from long-term exposure. In 1990, the California Air Resources Board (CARB) designated vinyl chloride as a toxic air contaminant.

Hydrogen Sulfide (H_2S). H_2S is a naturally occurring, colorless gas that, at low concentrations, produces a distinctive rotten egg odor. At higher concentrations, the gas produces a sweet odor. The gas is produced through the bacteriological breakdown of organic materials as well as some types of geothermal activity. Health effects associated with H2S include exposure to a disagreeable odor, coughing, irritation to eyes, and impairment of the respiratory system.

Visibility Reducing Particles. Visibility reducing particles are particulate matter composed of many different substances that are suspended in the atmosphere and contribute to haze and diminished visibility.

Toxic Air Contaminants/Hazardous Air Pollutants. Toxic air contaminants (TACs), also known as hazardous air pollutants (HAPs), are a wide range of pollutants that may cause or contribute to an increase in deaths or in serious illness, or which may pose present or potential hazards to human health (CARB 2010). Health effects associated with TACs, including cancer, are typically the result of acute or repeated exposure to these pollutants.

TACs are emitted from a number of different sources, including industrial sources (e.g., refining, manufacturing, utilities, and mining) commercial sources (e.g., gas stations and dry cleaners) and diesel-fueled vehicles. Currently, both the EPA and the State of California have recognized nearly 200 different contaminants as TACs/HAPs. CARB has identified 10 specific pollutants as posing the greatest risk to human health based on ambient background levels in the state. These pollutants include: acetaldehyde (CH3CHO), benzene (C6H6), 1,3-butadiene (C4H6), carbon tetrachloride (CCl4), hexavalent chromium, para-dichlorobenzene (C6H4Cl2), formaldehyde (CH2O), methylene chloride (CH2Cl2), perchloroethylene (C2Cl4), and diesel particulate matter (DPM). The potential TACs of most concern that are associated with the proposed project are benzene (C6H6) and diesel particulate matter (DPM).

Benzene (C6H6). Benzene is a colorless, flammable liquid with a pleasant, sweet odor that evaporates quickly when exposed to air. Benzene is produced naturally through geothermal processes, as a component of petroleum and natural gas, and as a byproduct of burning wood and other plant matter. Anthropomorphic sources of benzene include use as an ingredient in solvents and as an additive to gasoline.

Diesel Particulate Matter (DPM). DPM is produced by the combustion of diesel fuel and is composed of a mixture of various gases and fine particulate matter (i.e., soot). CARB recognized the particulate matter in DPM as a TAC in 1998 based on its potential to cause cancer and contribute to other adverse health effects (CARB 2011). This TAC is the most prevalent of the 10 specific pollutants identified by CARB and poses the greatest health risk.

Odors. Odors are generally considered a nuisance rather than a health hazard and can lead to discomfort and distress among the general public. However, as the human nose is the only means by which odors can be detected, the ability to identify and qualify odors is highly subjective. Some people have a greater ability to detect odors from minute emissions of odor causing substances and may take offense at certain odors that are unnoticeable or considered pleasant by others. In addition, regular exposure to odor may cause desensitization, resulting in "odor fatigue," whereby once recognized odors go unnoticed unless there is a change in the odor's intensity. Odors produced as a result of geothermal energy production can include the sulfurous, rotten egg smell characteristic of emissions of hydrogen sulfide (H2S). Ammonia (NH3) is also produced and has a sharp and irritating odor. The combustion of diesel fuel to power construction or operations related equipment can produce odors due to the sulfur content of diesel fuel.

Regional Climate and Local Air Quality

The proposed project is located in Imperial County, the southeastern most county in California. Imperial County is one of the hottest and driest parts of California and is located in a low latitude desert characterized by hot, dry summers and relatively mild winters. Average annual precipitation within Imperial County is less than 3 inches. The normal maximum temperature in January is approximately 70 degrees Fahrenheit (°F), and the normal minimum temperature

is approximately 41°F. In July, the normal maximum temperature can exceed 107°F, while the normal minimum temperature is approximately 75°F. Relative humidity in the summer is low, averaging 30 to 50 percent in the early morning and 10 to 20 percent in the afternoon. During the hottest part of the day, the relative humidity can drop below 10 percent. However, the effect of irrigation associated with extensive agricultural operations in the Imperial Valley tends to increase local humidity. The prevailing weather conditions promote intense heating during the day in summer with cooling at night. During the fall, winter, and spring, regional winds tend to come from the northwest. During the summer, winds tend to come from the southeast.
The CARB operates a network of 5 ambient air monitoring stations throughout Imperial County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants to determine whether the ambient air quality meets the California and federal standards. The air quality monitoring station located nearest to the project site is the Calexico Station located at 1029 East Belcher Street approximately 3 miles south of the project site. Table 3 provides a summary of monitoring data at the Belcher Street Station for ozone and PM_{10}. As referenced, the Salton Sea Basin is a nonattainment area for these two pollutants and moderate non-attainment area for the federal $PM_{2.5}$ standard.

As shown, the federal ozone standard was exceeded at the Calexico monitoring station during each of the last three years. No exceedances were reported for the state standard although the highest concentration in 2017 was greater than the 0.090 standard. The federal PM_{10} standard was exceeded during 2017. The state PM_{10} standard was exceeded during 2015. The $PM_{2.5}$ standard was exceeded during 2015, 2016 and 2017. The Calexico monitoring station is the only station is Imperial that reports exceedances of the $PM_{2.5}$ standard.

Air Quality Management Plan

ICAPCD is the local air pollution control agency for Imperial County and the southern portion of the Salton Sea Air Basin. The ICAPCD has primary responsibility for ensuring that state and federal air quality standards are attained and maintained within the ICAPCD's jurisdiction. Thus, the ICAPCD is responsible for preparing clean air plans, issuing construction and operation permits, monitoring ambient air quality, as well as developing and implementing rules and regulations that govern air quality within Imperial County. The ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs for controlling PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the Air Quality Attainment Plan (AQAP) for Imperial County.

A SIP revision for revised rules under ICAPCD Regulation VIII for fugitive dust PM_{10} was reviewed by EPA and the final rule was signed on March 27, 2013 and published in the Federal Register (Federal Register 2013). The ICAPCD adopted the rules on October 16, 2012 to regulate PM_{10} emissions from sources of fugitive dust (e.g., unpaved roads and disturbed soils in open and agricultural areas). CARB submitted these rules to EPA for approval on November 7, 2012; EPA proposed approval of these revisions to the ICAPCD portion of the California SIP on January 7, 2013.

Table 3
Ambient Air Quality Data

Pollutant	2015	2016	2017
Ozone, ppm - Worst Hour	0.82	0.77	0.92
Number of days of State exceedances (>0.09 ppm)	0	0	*
Number of days of Federal exceedances (>0.070 ppm)	12	9	17
Particulate Matter <10 microns, $\mu g/m^3$ Worst 24 Hours	135.2	239.9	410.2
Number of samples of State exceedances (>50 $\mu g/m^3$)	128.2	*	*
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	*	6.2
Particulate Matter <2.5 microns, $\mu g/m^3$ First High	87.1	45.3	49.1
Annual average (exceedances of 12 $\mu g/m^3$ standard not reported)	11.5	12.5	11.8
Number of samples of Federal exceedances (>12 $\mu g/m^3$)	*	*	*

Calexico Monitoring Station
Source: California Air Resources Board, 2015, 2016, 2017 Annual Air Quality Data Summaries available at http://www.arb.ca.gov/adam/topfour/topfour1.php
*- No data or insufficient data

Rules and regulations promulgated by the ICAPCD and in the SIP revision applicable to the proposed project include the following:

- ICAPCD Rule 800 General Requirements for Control of Fine Particulate Matter (PM-10), requires actions to prevent, reduce, or mitigate PM-10 emissions from anthropogenic (man-made) Fugitive Dust (PM-10) sources generated within Imperial County.

- ICAPCD Regulation VIII, Rule 801 (Construction and Earthmoving Activities) establishes a 20 percent opacity limit, requires the implementation of a dust management control plan for all nonresidential projects of 5 acres or more, and requires compliance with other portions of Regulation VIII regarding bulk materials (Rule 802), carry-out and track-out (Rule 803), and paved and unpaved roads (Rule 805). The rule exempts single-family homes and waives the 20 percent opacity limit in winds over 25 miles per hour (mph) under certain conditions. To comply with this reguation, the applicant would implement Measure AQ-1 as described later in this report which requires preparation of a Fugitive Dust Control Plan to minimize dust generated during construction and ground disturbing activities.

- ICAPCD Rule 804 Open Areas, requires actions to prevent, reduce or mitigate the amount of fine Particulate Matter (PM-10) emissions generated from Open Areas. Open areas are defined as any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

ICAPCD adopted the 2013 $PM_{2.5}$ plan on December 2, 2014. The plan was transmitted to CARB on December 9, 2014. CARB reviewed and approved the plan on December 18, 2015 as a revision to the California State Implementation Plan for Imperial County. The plan was submitted to the U.S. EPA on January 9, 2015 and is pending approval.

On October 23, 2018 the Imperial County Air Pollution Control District Board of Directors fully approved the *"Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter"*. The California Air Resources Board during a December 13, 2018 Public Hearing approved the *Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter.*

On August 24, 2016 the EPA finalized its implementing rule for the newly established primary annual standard for $PM_{2.5}$. Moderate non-attainment areas are required by Code of Federal Regulations section 51.1003(a) to submit a State Implementation Plan no later than 18 months from the date of designation (October 2016). On April 24, 2018 the Imperial County Air Pollution Control District Board of Directors fully approved the *"Imperial County 2018 Annual Particulate Matter Less than 2.5 Microns in Diameter State Implementation Plan"* On May 25, 2018 the California Air Resources Board approved the *Imperial County 2018 Annual Particulate Matter Less than 2.5 Microns in Diameter State Implementation Plan Final Annual PM2.5 Plan.*

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. The nearest receptor is a single-family residence located on the south side of Correll Road approximately 2,535 feet north of the site.

AIR QUALITY IMPACT ANALYSIS

Methodology and Significance Thresholds

This air quality analysis conforms to the methodologies recommended in the ICAPCDs *CEQA Air Quality Handbook* (last amended December 12, 2017). The handbook includes thresholds for emissions associated with both construction and operation of proposed projects. All emissions associated with construction vehicle and equipment operations were calculated using the California Emissions Estimator Model (CalEEMod) software version 2016.3.2. As referenced, construction emissions would be associated with clearing, grading and laying down asphalt gradings to create parking areas. These emissions would consist of diesel exhaust and dust emissions. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders. It was assumed that all construction equipment

used would be diesel-powered. Construction emissions associated with development of the proposed project by estimating the types of equipment (including the number) that would be used on-site during each of the construction phases and scope of improvements required to implement the project as defined herein.

To determine whether construction and operation of the project would cause a regional air quality impact, the increase in emissions is compared with the ICAPCD's recommended regional thresholds for operational emissions.

Regional Thresholds. Based on Appendix G of the *CEQA Guidelines*, a project would have a significant air quality impact if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan;
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);
d) Expose sensitive receptors to substantial pollutant concentrations; or
e) Create objectionable odors affecting a substantial number of people.

The Imperial County APCD CEQA Air Quality Handbook establishes the following four separate evaluation categories for evaluating project construction and operational emissions:

a) Comparison of calculated project emissions to Imperial County APCD emission thresholds;
b) Consistency with the most recent Clean Air Plan for Imperial County;
c) Comparison of predicted ambient pollutant concentrations resulting from the project to state and federal health standards, when applicable;
d) The evaluation of special conditions which apply to certain projects.

Any development with a potential to emit criteria pollutants below significance levels defined by the Imperial County APCD is referred to as a "Tier I project," and is considered by the Imperial County APCD to have less than significant potential adverse impacts on local air quality. For Tier I projects, the project proponent should implement a set of feasible "standard" mitigation measures (determined by the Imperial County APCD) to reduce the air quality impact to an insignificant level. A "Tier II project" is one whose emissions exceed any of the thresholds. Its impact is significant and the project proponent should select and implement all feasible "discretionary" mitigation measures (as determined by the Imperial County APCD) in addition to the standard measures. Tier I and Tier II thresholds are shown in Table 4.

Table 4
ICAPCD Tier I and Tier II Daily Operational Thresholds

Pollutant	Tier I	Tier II
NOx and ROG	Less than 137 lbs/day	Greater than 137 lbs/day
PM_{10} and SOx	Less than 150 lbs/day	Greater than 150 lbs/day
CO and $PM_{2.5}$	Less than 550 lbs/day	Greater than 550 lbs/day
ROG = reactive organic gas; NOX = oxides of nitrogen; CO = carbon monoxide; PM10 = particulate matter with an aerodynamic diameter 10 microns or less; lbs/day = pounds per day SOURCE: Imperial County APCD 2017		

Construction and operational emission thresholds used to evaluate the significance of project-related impacts are shown in Table 5.

Table 5
ICAPCD Daily Construction and Operation Emission Thresholds

Pollutant	Construction (pounds/day)	Operation (pounds/day)
Reactive Organic Gases	75	137
Nitrogen Oxide	100	137
Carbon Monoxide	550	550
Particulate Matter 10	150	150
Particulate Matter 2.5	N/A	550
Sulfur Oxides	N/A	150

Source: ICAPCD CEQA Handbook, 2017
N/A = Construction thresholds for $PM_{2.5}$ and SOx are not applicable.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions (CO and NOx) from heavy construction vehicles and trucks. Construction would generally consist of site preparation, grading, transporting asphalt grindings and compacting the material to create parking areas. Assuming the entire 20-acre site is covered in six inches of asphalt grindings, the total required would be approximately 16,133 cubic yards of material import to cover the site. If 20-yard trucks were used to transport the material, the total number of truck trips required would be 807. As described, the applicant is intending to construct the first 5.9 acres comprising Phase I. Subsequent phases would be constructed based on market demand; however, to provide the applicant flexibility with respect to future construction phasing, it was conservatively assumed that all surface material would be delivered during the site preparation and grading phases of the construction process. For fugitive dust control purposes, it was assumed that the entire 6-acre Phase I site would be disturbed daily and that subsequent phases would affect areas similar in size. For modeling purposes, it was assumed that all truck trips needed to deliver surface materials during the site preparation phase would overlap with the grading phase by approximately 30 days. Construction emission estimates are shown in Table 6.

Table 6
Estimated Maximum Daily Construction Emissions

Construction Phase - 2020	Maximum Emissions (lbs/day)					
	ROG	NO_x	SOx	CO	PM_{10}	$PM_{2.5}$
Project Construction	8.9	98.9	0.12	56.1	142.8	25.8
ICAPCD Regional Thresholds	*75*	*100*	*No Standard*	*550*	*150*	*No Standard*
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

The emissions shown in Table 6 are mitigated to primarily control fugitive dust (PM_{10}) emissions during construction. To minimize fugitive dust and general construction emissions, the applicant would be required to implement fugitive dust control measures per ICAPCD Rules 801 and 804 as referenced herein. The fugitive dust control plan and related requirements to control fugitive dust emissions during construction are addressed as follows and assumed to be conditions of approval for the project:

AQ-1a: Prior to commencing construction, the project applicant will be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM_{10} emissions and associated mitigation measures during the construction and operational phases (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control and address the following parameters:

- All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing particulate matter with 5 percent or greater silt content. For modeling purposes, it was assumed that watering would occur three times daily and be augmented as needed in work areas to achieve a moisture content of at least 12% for dust control purposes.

- All on-site unpaved roads segments or areas used for hauling materials shall be effectively stabilized. Visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering. For modeling purposes, it was assumed soil stabilizers would achieve a 20% reduction in PM_{10} emissions from

unpaved roads/surfaces, moisture content within disturbed areas would be maintained at 12% and vehicle speeds on unpaved roads would be limited to 10 miles per hour.

- The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.

- All track-out or carry-out on paved public roads, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line except where such material or activity is exempted from stabilization by the rules of ICAPCD.

- No more than 6 acres of surface area should be disturbed during any one day period and the delivery of surface materials, including asphalt grindings, should be limited to approximately 27 truck trips daily (assuming 20 yards per truck) over a 30 day period to overlap with site grading operations.

AQ-1b: Each project proponent shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NOx emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations. These measures include:

- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
- Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum.
- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).
- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.
- Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts).

With implementation of AQ1a and AQ1b, construction related impacts would be less than significant. No additional mitigation would be required.

Long-Term Regional Impacts

Regional Pollutant Emissions

Table 7 summarizes emissions associated with operation of the parking storage area. Emissions would be primarily generated by worker and hauling trips to and from the site. Trip volumes were based on data provided by the applicant and incorporated into the Traffic Impact Assessment. A total of 40 heavy trucks and four new workers would visit the site daily. Assuming use of a passenger car equivalent of 2.0 for heavy trucks, a total of 168 new daily one-way trips would be generated by the project. Because the fleet mix is unknown, the CalEEMod default for the project type was used for modeling purposes.

Emissions generated operation of the proposed facility would be limited to mobile source emissions associated with truck operation and employee traffic. No stationary emission sources would be associated with the project. As shown in Table 7, the ICAPCD thresholds for ROG, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$ would not be exceeded. Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be less than significant.

Table 7
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Project Daily Emissions	9.0	51.5	36.7	0.07	0.03	0.03
SCAQMD Thresholds	**137**	**137**	**550**	**150**	**150**	**550**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Summer emissions shown.

Carbon Monoxide Hotspot

The nearest sensitive receptor to the project site is the single-family residence located on the south side of Correll Road, approximately 2,535 feet north of the site. As shown above, total construction and operation emissions would not exceed the ICAPCD thresholds. Methods developed by the University of California Davis (1997) are used to determine when a CO hotspot analysis is recommended. A CO hotspot analysis is recommended if an intersection meets one of the following criteria: 1) the intersection is at Level of Service (LOS) D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project decreases LOS at an intersection to D or worse. A CO hotspot is a localized concentration of CO

that is above the state or national 1-hour or 8-hour CO ambient air standards. Localized CO "hotspots" can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal AAQS of 35.0 parts per million (ppm) or the state AAQS of 20.0 ppm. No adverse effects to traffic circulation were identified in the Traffic Impact Analysis (May 2019). Thus, the project would not generate sufficient traffic to cause existing operations to drop below LOS D at the East Heber Road/SR 111 intersection. No CO hotspot would occur under operating conditions.

Objectionable Odors

The proposed project would generate odors from construction (i.e., diesel exhaust); however, this would be temporary. Construction emissions would not exceed ICAPCD impact thresholds; thus, short-term odors are not expected to be significant. No odors would be associated with project operation. Odor impacts would be **less than significant.**

Air Quality Attainment Plan Consistency

A project may be inconsistent with the AQAP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. As referenced, the ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs for controlling $PM_{2.5}$, PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the AQAP for Imperial County.

The SIP adopted by ICAPCD incorporates local city General Plans and the socioeconomic forecast projections related to regional population, housing and employment growth. The proposed project involves the expansion of an existing truck parking and storage facility. The proposed project would not result in population growth in excess of forecasts for Imperial County. The project would require a GPA; however, this is proposed to ensure the land use designation on the parcels comprising the site are consistent. It is assumed the addition of four employees would be accommodated from the existing labor pool; thus, the GPA would not facilitate a growth in population beyond what is projected and would not conflict with the AQAP.

GREENHOUSE GAS EMISSIONS

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of

GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 2014).

Total U.S. GHG emissions were 6,587 MMT CO_2E in 2015 (U.S. EPA, April 2017). Total U.S. emissions decreased over 2014 levels primarily as a result of less fossil fuel combustion. However, emissions vary annually. For example, emissions increased by 3.2 percent from 2009 to 2010. The increase was due in part to (1) an increase in economic output resulting in greater energy consumption across all sectors; and (2) warmer summer conditions resulting in an increase in electricity demand for air conditioning (U.S. EPA, April 2012). In 2015, electricity production and transportation accounted for 29 percent and 27 percent of CO_2 emissions from fossil fuel combustion, respectively. The residential and commercial end-use sectors accounted for 22 percent and 19 percent of CO_2 emissions from fossil fuel combustion, respectively, during 2010 (U.S. EPA, April 2012).

Based upon the California Air Resources Board (ARB) 2017 Scoping Plan (ARB, 2017), California produced 440.4 MMT CO_2E in 2015. The major source of GHG in California is transportation, contributing 37 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state's GHG emissions. California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. The ARB has projected statewide unregulated GHG emissions for the year 2020 is projected to be 509 MMT CO_2E (ARB, May 2014). These projections are based on Business As Usual (BAU) conditions and represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

California Regulations

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 states that by 2020, emissions shall be

reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report recommended various strategies that the state could pursue to reduce GHG emissions. These strategies could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture.

Assembly Bill 32 and CARB's Scoping Plan

To further the goals established in EO S-3-05, the Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2E). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33%;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions;

4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan (CARB 2008), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020) absent GHG reducing laws and regulations (referred to as Business-As-Usual (BAU)). To calculate this percentage reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (CARB 2011a), CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7% (down from 28.5%) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009–2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 28.5%) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050" (CARB 2014). Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands. The First Update identifies key recommended

actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050" (CARB 2014). Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the IPCC. Using the recalculated 1990 emissions level (431 MMT CO_2E) and the revised 2020-emissions-level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 28.5% or 16%) from the BAU conditions (CARB 2014).

In January 2017, CARB released, *The 2017 Climate Change Scoping Plan Update* (Second Update; CARB 2017b), for public review and comment. This update proposes CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below), including continuing the Cap-and-Trade Program through 2030, and includes a new approach to reduce GHGs from refineries by 20%. The Second Update incorporates approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document that was adopted by CARB in March 2017), acknowledges the need for reducing emissions in agriculture, and highlights the work underway to ensure that California's natural and working lands increasingly sequester carbon. During development of the Second Update, CARB held a number of public workshops in the Natural and Working Lands, Agriculture, Energy, and Transportation sectors to inform development of the 2030 Scoping Plan Update (CARB 2016). The Second Update has not been considered by CARB's Governing Board at the time this analysis was prepared.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

Other regulations affecting state and local GHG planning and policy development are summarized as follows:

Assembly Bill 939 and Senate Bill 1374
Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Senate Bill 1368

Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was adopted September, 2006. SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by California Public Utilities Commission (CPUC) and California Energy Commission (CEC).

Senate Bill 97

Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010. Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.

- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.

- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.

- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.

- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."

- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

Senate Bills 1078, 107, and X1-2 and Executive Orders S-14-08 and S-21-09
Senate Bill 1078 (SB 1078) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) changed the target date to 2010. Executive Order S-14-08 was signed on November 2008 and expands the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations (CCR) Title 24, Part 6
CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008 and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. All buildings for which an application for a building permit is submitted on or after July 1, 2014 must follow the 2013 standards. The 2013 commercial standards are estimated to be 30 percent more efficient than the 2008 standards; 2013 residential standards are at least 25 percent more efficient. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

Senate Bill 375
Senate Bill 375 (SB 375) was adopted in September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each

MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable community's strategy or alternate planning strategy for consistency with its assigned targets.

The proposed project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has authority to develop the SCS or APS. For the SCAG region, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 13 percent below 2005 per capita GHG emissions levels by 2035. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), which meets the CARB emission reduction requirements. The Housing Element Update is required by the State to be completed within 18 months after RTP/SCS adoption. The current Riverside County Housing Element 2013-2021 was adopted October 7, 2015.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, CEQA incentivizes, through streamlining and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as "transit priority projects."

Senate Bill X7-7

Senate Bill X7-7 (SB X7-7), enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

California Green Building Standards

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402(d)) and cost effectiveness (California Public Resources Code, Sections 25402(b)(2) and (b)(3)). These standards are updated to consider and incorporate

new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2016 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2017. In general, single-family homes built to the 2016 standards are anticipated to use approximately 28% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards, and nonresidential buildings built to the 2016 standards will use an estimated 5% less energy than those built to the 2013 standards (CEC 2015a).

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as "CALGreen," and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective on January 1, 2017. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance;
- Diversion of 65% of construction and demolition waste from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle board.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste,

15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs (24 CCR Part 11).

The California Public Utilities Commission, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include the following: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030 (CPUC 2013).[2] As most recently defined by the CEC in its 2015 Integrated Energy Policy Report (CEC 2015b), a ZNE code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's Time Dependent Valuation metric.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO2E. EO B-30-15 also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate

[2] It is expected that achievement of the ZNE goal will occur through revisions to the Title 24 standards.

change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Local Regulations and CEQA Requirements

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), and the San Joaquin Air Pollution Control District (SJVAPCD) have adopted quantitative significance thresholds for GHGs. However, in March 2013 the Bay Area's thresholds were overruled by the Alameda County Superior Court (*California Building Industry Association v. Bay Area Air Quality Management District*), on the basis that adoption of the thresholds constitutes a "project" under CEQA, but did not receive the appropriate environmental review. As a result, BAAQMD has elected to not recommend specific GHG thresholds for use in CEQA documents.

The SCAQMD threshold, which was adopted in December 2008, considers emissions of over 10,000 metric tons CO2E /year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD is the CEQA lead agency. Although not formally adopted, the SCAQMD has developed a draft quantitative threshold for all land use types of 3,000 metric tons CO_2E /year (SCAQMD, September 2010). Note that lead agencies retain the responsibility to determine significance on a case-by-case basis for each specific project.

The Imperial County Air Pollution Control District (ICAPCD) has no regulations or additional guidelines relative to GHG emissions for residential, commercial, or industrial projects;

however, ICAPCD Rule 903 applies to any stationary source that would have the potential to emit air contaminants equal to or in excess of the threshold for a major source of regulated air pollutants. In 2011, ICAPCD amended Rule 903 to add GHGs to the list of regulated pollutants. As part of the revised rule, stationary sources that exceed the *de minimis* emissions level of 20,000 tons of carbon dioxide equivalent (CO_2E) per year in a 12-month period would need to meet recordkeeping and reporting requirements.

CLIMATE CHANGE IMPACT ANALYSIS

Thresholds of Significance

Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

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

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). As referenced, the IPAPCD uses 20,000 MT CO_2E annually as the threshold for stationary emission sources. GHG emissions associated with the proposed project would be associated with mobile sources; thus, while not formally adopted, the SCAQMD has developed a draft quantitative threshold for all land use types of 3,000 metric tons CO_2E /year as referenced above. Thus, for the purpose of this evaluation, 3,000 metric tons CO2E/year is used to determine whether the project could cumulatively contribute to advere impacts associated with GHG emisions.

Methodology

Site preparation activities, site grading, exhaust from vehicles transporting construction materials and personnel, and emissions from heavy-duty construction equipment could generate GHG emissions. Construction emissions would vary based on the number and types

of heavy-duty vehicles and equipment in use, the intensity of construction activities, the number of construction personnel involved, and the length of time over which these construction activities would occur. Additionally, the level of GHGs emitted during construction would increase with the greater level of intensity of each of these factors.

The proposed project is expansion of a truck/trailer parking and storage facility. Implementation would generate GHG emissions during construction and operation. Thus, whether GHG emissions associated with the project would be significant is based on the 3,000 MT CO_2E threshold used by SCAQMD referenced above.

GHG emissions associated with construction and operation of the proposed project and existing development have been estimated using California Emissions Estimator Model (CalEEMod) version 2016.3.2.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily associated with the operation of construction equipment and truck trips. Demolition and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction of the entire 20-acre parking area are based on the projected maximum amount of equipment that would be used onsite over the duration of construction assuming use of the default construction equipment mix used in CalEEMod 2016.3.2. Construction emissions are amortized over a 30-year period to calculate annual emissions. Emission are shown in Table 8. Complete CalEEMod results and assumptions are provided in Appendix A.

Construction Emissions

Construction activity is assumed to occur over a period of approximately 12 months beginning in early 2019 and conclude in late 2019. Based on CalEEMod results, construction activity for the project would generate an estimated 200 metric tons of carbon dioxide equivalent (CO_2E), as shown in Table 8 Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate 6.7 metric tons of CO_2E per year.

Operational Emissions

Long-term emissions related to the project are focused on mobile sources. No energy use, solid waste or water use emissions are assigned to the proposed use in CalEEMod.

Transportation Emissions. Mobile source GHG emissions were estimated using the average daily trips calculated by CalEEMod for the proposed facility based on both default and modified input variables in CalEEMod. Table 9 shows the estimated mobile emissions of GHGs for the project. As shown in Table 9, the project would generate approximately 1,211 metric tons of CO_2E associated with new vehicle trips.

Table 8
Estimated Construction Related Greenhouse Gas Emissions

Year	Annual Emissions (metric tons CO_2E)
2020	200
Total	**200**
Amortized over 30 years	**6.7 metric tons per year**

See Appendix for CalEEMod software program output for new construction.

Table 9
Estimated Annual Mobile Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Proposed Project	
Mobile Emissions (CO_2 & CH_4)	1,211 metric tons
Total	**1,211 metric tons**

See Appendix for CalEEMod software program output (demolitions and new construction).
[1] California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1,January 2009, page 30-35. See Appendix for calculations.

Combined Construction and Mobile Source Emissions

Table 10 combines the net new construction, operational, and mobile GHG emissions associated with the proposed project. As discussed above, temporary emissions associated with construction activity (approximately 6.7 metric tons CO_2E) are amortized over 30 years (the anticipated life of the project).

For the proposed project, the combined annual emissions would total approximately 1,218 metric tons per year in CO_2E. This total represents less than 0.001% of California's total 2015 emissions of 440.4 million metric tons. Post-construction, all of the project's GHG emissions are associated with motor vehicular use. The proposed project is evaluated based on the threshold of 3,000 MT CO_2E annually. Project-related annual GHG emissions would not exceed the threshold of 3,000 metric tons per year; therefore, impacts from GHG emissions would be less than significant per threshold a.

Table 10
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	6.7 metric tons
Mobile	1,211 metric tons
Total	**1,217.7 metric tons**

See Appendix for CalEEMod software program output (demolition and new construction).

GHG Cumulative Significance

As discussed above, a proposed project exceeding the 3,000 annual MT screening threshold could have a significant environmental impact under CEQA. Implementation of the proposed exploratory program would not exceed the IPAPCD or SCAQMD GHG emission thresholds; and thus, would not cumulatively contribute to significant or adverse impacts.

REFERENCES

Association of Environmental Professionals. *California Environmental Quality Act (CEQA) Statute and Guidelines.* 2012

Association of Environmental Professionals. *California Environmental Quality Act (CEQA) Statute and Guidelines.* 2012

California Air Pollution Control Officers Association. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA).* January 2008.

California Air Resources Board. *Ambient Air Quality Standards.* Updated February 2016. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf

California Air Resources Board. 2014, 2015, & 2016 Annual Air Quality Data Summaries. http://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed May 2017.

California Air Resources Board. June 2017. *Greenhouse Gas Inventory Data Inventory Program.* Available: https://www.arb.ca.gov/cc/inventory/inventory.htm

California Air Resources Board. April 2012. *Greenhouse Gas Inventory Data – 2020 Emissions Forecast.* Available: http://www.arb.ca.gov/cc/inventory/data/forecast.htm

California Air Resources Board. May 2014. *2020 Business As Usual Emission Projection, 2014 Edition.* Available: http://www.arb.ca.gov/cc/inventory/data/tables/2020_bau_forecast_by_scoping_category_2014-05-22.pdf

California Air Resources Board. June 2015. *Greenhouse Gas Emissions Inventory– 2015 Edition* Available: http://www.arb.ca.gov/cc/inventory/data/data.htm

California Air Resources Board. April 2005. *Air Quality and Land Use Handbook; A Community Health Perspective.*

California Climate Action Registry General Reporting Protocol, *Reporting Entity-Wide Greenhouse Gas Emissions,* Version 3.1, January 2009.

California Environmental Protection Agency, March 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature.* http://www.climatechange.ca.gov/climate_action_team/reports/2006-04-03_FINAL_CAT_REPORT_EXECSUMMARY.PDF

Imperial County Air Pollution Control District, *State Implementation Plan,* www.co.imperial.ca.us. Accessed January 16, 2017.

Imperial County Air Pollution Control District, *CEQA Air Quality Handbook*, December 12, 2017.

Intergovernmental Panel on Climate Change [IPCC]. *Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories*. [Kroeze, C.; Mosier, A.; Nevison, C.; Oenema, O.; Seitzinger, S.; Cleemput, O. van; Conrad, R.; Mitra, A.P.; H.U., Neue; Sass, R.]. Paris: OECD, 1997.

Office of the California Attorney General. The California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level. Updated May 21, 2008. http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf

South Coast Air Quality Management District (SCAQMD). *California Emissions Estimator Model User Guide Version 2016.3.2*. Prepared by BREEZE Software, A Division of Trinity Consultants. September 2016.

United States Environmental Protection Agency (U.S. EPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2010*. U. S. EPA #430-R-11-005. April 2012. http://www.epa.gov/climatechange/emissions/usinventoryreport.html

United States Environmental Protection Agency (U.S. EPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015*. U. S. EPA #430-P-17-001. April 2017. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2015

University of California Davis, *Transportation Project-Level Carbon Monoxide Protocol*, December 1997.

This page intentionally left blank.

Appendix A

CalEEMod Air Quality and Greenhouse Gas Emissions Model Results – Summer/Annual Construction Emissions

West Wind Parking Storage

Imperial County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	20.00	Acre	20.00	871,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.4	**Precipitation Freq (Days)**	12
Climate Zone	15			**Operational Year**	2020
Utility Company	Imperial Irrigation District				
CO2 Intensity (lb/MWhr)	1270.9	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Construction phased over 60 day period for construction of 6-acre parking area assuming import of asphalt grindings for surface material. Site preparation phase overlapped with grading to reduce daily vehicle emissions associated with surface material delivery and material placement on-site during grading operations.

Trips and VMT - trip calculations assume use of 20-yard trucks importing 16,133 cy of material.

Grading - Assumes 6 acres disturbed daily for Phase I during site preparation and grading for dust control purposes.

Vehicle Trips - Trip estimates based on Traffic Impact Assessment
The percent of non-residential trips are estimated

Construction Off-road Equipment Mitigation - Assumes watering 3 times daily during grading for dust control.

Fleet Mix -

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterExposedAreaPM10PercentReduction	61	55
tblConstDustMitigation	WaterExposedAreaPM25PercentReduction	61	55
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	10
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	PhaseEndDate	2/14/2020	3/13/2020
tblGrading	AcresOfGrading	75.00	6.00
tblGrading	AcresOfGrading	0.00	6.00
tblGrading	MaterialImported	0.00	16,133.00
tblTripsAndVMT	HaulingTripNumber	2,017.00	807.00
tblVehicleTrips	CNW_TTP	0.00	99.00
tblVehicleTrips	CW_TTP	0.00	1.00
tblVehicleTrips	ST_TR	0.00	168.00
tblVehicleTrips	SU_TR	0.00	168.00
tblVehicleTrips	WD_TR	0.00	168.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	8.9327	98.9690	56.1892	0.1232	625.0361	4.3930	629.4291	73.2949	4.0423	77.3372	0.0000	12,107.8289	12,107.8289	3.2379	0.0000	12,188.7768
Maximum	**8.9327**	**98.9690**	**56.1892**	**0.1232**	**625.0361**	**4.3930**	**629.4291**	**73.2949**	**4.0423**	**77.3372**	**0.0000**	**12,107.8289**	**12,107.8289**	**3.2379**	**0.0000**	**12,188.7768**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	8.9327	98.9690	56.1892	0.1232	138.4869	4.3930	142.8799	21.8523	4.0423	25.8946	0.0000	12,107.8289	12,107.8289	3.2379	0.0000	12,188.7768
Maximum	**8.9327**	**98.9690**	**56.1892**	**0.1232**	**138.4869**	**4.3930**	**142.8799**	**21.8523**	**4.0423**	**25.8946**	**0.0000**	**12,107.8289**	**12,107.8289**	**3.2379**	**0.0000**	**12,188.7768**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**77.84**	**0.00**	**77.30**	**70.19**	**0.00**	**66.52**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Area	0.4083	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	9.0826	51.5044	36.7180	0.0744	0.0000	0.0370	0.0370	0.0000	0.0348	0.0348		7,710.6197	7,710.6197	1.3611		7,744.6475
Total	**9.4909**	**51.5044**	**36.7201**	**0.0744**	**0.0000**	**0.0370**	**0.0370**	**0.0000**	**0.0348**	**0.0348**		**7,710.6241**	**7,710.6241**	**1.3611**	**0.0000**	**7,744.6522**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Area	0.4083	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	9.0826	51.5044	36.7180	0.0744	0.0000	0.0370	0.0370	0.0000	0.0348	0.0348		7,710.6197	7,710.6197	1.3611		7,744.6475
Total	**9.4909**	**51.5044**	**36.7201**	**0.0744**	**0.0000**	**0.0370**	**0.0370**	**0.0000**	**0.0348**	**0.0348**		**7,710.6241**	**7,710.6241**	**1.3611**	**0.0000**	**7,744.6522**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/6/2020	1/31/2020	5	20	
2	Site Preparation	Site Preparation	2/1/2020	3/13/2020	5	30	
3	Grading	Grading	2/15/2020	3/27/2020	5	30	

Acres of Grading (Site Preparation Phase): 6

Acres of Grading (Grading Phase): 6

Acres of Paving: 20

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	807.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Soil Stabilizer

Replace Ground Cover

Water Exposed Area

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.3121	33.2010	21.7532	0.0388		1.6587	1.6587		1.5419	1.5419		3,747.7049	3,747.7049	1.0580		3,774.1536
Total	**3.3121**	**33.2010**	**21.7532**	**0.0388**		**1.6587**	**1.6587**		**1.5419**	**1.5419**		**3,747.7049**	**3,747.7049**	**1.0580**		**3,774.1536**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1045	0.0647	0.7596	8.6000e-004	80.6215	5.7000e-004	80.6221	8.0535	5.3000e-004	8.0541		84.9604	84.9604	7.2100e-003		85.1407
Total	**0.1045**	**0.0647**	**0.7596**	**8.6000e-004**	**80.6215**	**5.7000e-004**	**80.6221**	**8.0535**	**5.3000e-004**	**8.0541**		**84.9604**	**84.9604**	**7.2100e-003**		**85.1407**

3.2 Demolition - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.3121	33.2010	21.7532	0.0388		1.6587	1.6587		1.5419	1.5419	0.0000	3,747.7049	3,747.7049	1.0580		3,774.1536
Total	**3.3121**	**33.2010**	**21.7532**	**0.0388**		**1.6587**	**1.6587**		**1.5419**	**1.5419**	**0.0000**	**3,747.7049**	**3,747.7049**	**1.0580**		**3,774.1536**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1045	0.0647	0.7596	8.6000e-004	17.1013	5.7000e-004	17.1018	2.1279	5.3000e-004	2.1284		84.9604	84.9604	7.2100e-003		85.1407
Total	**0.1045**	**0.0647**	**0.7596**	**8.6000e-004**	**17.1013**	**5.7000e-004**	**17.1018**	**2.1279**	**5.3000e-004**	**2.1284**		**84.9604**	**84.9604**	**7.2100e-003**		**85.1407**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.3855	0.0000	18.3855	9.9698	0.0000	9.9698			0.0000			0.0000
Off-Road	4.0765	42.4173	21.5136	0.0380		2.1974	2.1974		2.0216	2.0216		3,685.1016	3,685.1016	1.1918		3,714.8975
Total	**4.0765**	**42.4173**	**21.5136**	**0.0380**	**18.3855**	**2.1974**	**20.5829**	**9.9698**	**2.0216**	**11.9914**		**3,685.1016**	**3,685.1016**	**1.1918**		**3,714.8975**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1415	6.1903	0.7929	0.0210	396.1752	0.0202	396.1955	39.5897	0.0194	39.6090		2,201.6291	2,201.6291	0.0854		2,203.7638
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1253	0.0776	0.9116	1.0300e-003	96.7459	6.8000e-004	96.7465	9.6642	6.3000e-004	9.6649		101.9525	101.9525	8.6600e-003		102.1689
Total	**0.2669**	**6.2679**	**1.7044**	**0.0220**	**492.9211**	**0.0209**	**492.9420**	**49.2539**	**0.0200**	**49.2739**		**2,303.5816**	**2,303.5816**	**0.0941**		**2,305.9326**

3.3 Site Preparation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.2735	0.0000	8.2735	4.4864	0.0000	4.4864			0.0000			0.0000
Off-Road	4.0765	42.4173	21.5136	0.0380		2.1974	2.1974		2.0216	2.0216	0.0000	3,685.1016	3,685.1016	1.1918		3,714.8975
Total	**4.0765**	**42.4173**	**21.5136**	**0.0380**	**8.2735**	**2.1974**	**10.4709**	**4.4864**	**2.0216**	**6.5080**	**0.0000**	**3,685.1016**	**3,685.1016**	**1.1918**		**3,714.8975**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1415	6.1903	0.7929	0.0210	84.0848	0.0202	84.1050	10.4754	0.0194	10.4948		2,201.6291	2,201.6291	0.0854		2,203.7638
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1253	0.0776	0.9116	1.0300e-003	20.5215	6.8000e-004	20.5222	2.5534	6.3000e-004	2.5541		101.9525	101.9525	8.6600e-003		102.1689
Total	**0.2669**	**6.2679**	**1.7044**	**0.0220**	**104.6063**	**0.0209**	**104.6272**	**13.0288**	**0.0200**	**13.0488**		**2,303.5816**	**2,303.5816**	**0.0941**		**2,305.9326**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2342	0.0000	6.2342	3.3331	0.0000	3.3331			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9583	0.0620		2.1739	2.1739		2.0000	2.0000		6,005.8653	6,005.8653	1.9424		6,054.4257
Total	**4.4501**	**50.1975**	**31.9583**	**0.0620**	**6.2342**	**2.1739**	**8.4081**	**3.3331**	**2.0000**	**5.3331**		**6,005.8653**	**6,005.8653**	**1.9424**		**6,054.4257**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1393	0.0862	1.0128	1.1500e-003	107.4954	7.6000e-004	107.4961	10.7380	7.0000e-004	10.7387		113.2805	113.2805	9.6200e-003		113.5209
Total	**0.1393**	**0.0862**	**1.0128**	**1.1500e-003**	**107.4954**	**7.6000e-004**	**107.4961**	**10.7380**	**7.0000e-004**	**10.7387**		**113.2805**	**113.2805**	**9.6200e-003**		**113.5209**

3.4 Grading - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.8054	0.0000	2.8054	1.4999	0.0000	1.4999			0.0000			0.0000
Off-Road	4.4501	50.1975	31.9583	0.0620		2.1739	2.1739		2.0000	2.0000	0.0000	6,005.8653	6,005.8653	1.9424		6,054.4257
Total	**4.4501**	**50.1975**	**31.9583**	**0.0620**	**2.8054**	**2.1739**	**4.9793**	**1.4999**	**2.0000**	**3.4999**	**0.0000**	**6,005.8653**	**6,005.8653**	**1.9424**		**6,054.4257**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1393	0.0862	1.0128	1.1500e-003	22.8017	7.6000e-004	22.8025	2.8371	7.0000e-004	2.8378		113.2805	113.2805	9.6200e-003		113.5209
Total	**0.1393**	**0.0862**	**1.0128**	**1.1500e-003**	**22.8017**	**7.6000e-004**	**22.8025**	**2.8371**	**7.0000e-004**	**2.8378**		**113.2805**	**113.2805**	**9.6200e-003**		**113.5209**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.0826	51.5044	36.7180	0.0744	0.0000	0.0370	0.0370	0.0000	0.0348	0.0348		7,710.6197	7,710.6197	1.3611		7,744.6475
Unmitigated	9.0826	51.5044	36.7180	0.0744	0.0000	0.0370	0.0370	0.0000	0.0348	0.0348		7,710.6197	7,710.6197	1.3611		7,744.6475

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Non-Asphalt Surfaces	3,360.00	3,360.00	3360.00		
Total	3,360.00	3,360.00	3,360.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Non-Asphalt Surfaces	6.70	5.00	8.90	1.00	0.00	99.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Non-Asphalt Surfaces	0.503420	0.033264	0.160883	0.129541	0.018929	0.005318	0.019165	0.118376	0.003239	0.001168	0.005214	0.000745	0.000738

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.4083	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003
Unmitigated	0.4083	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0996					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.3086					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003
Total	**0.4083**	**2.0000e-005**	**2.0600e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**4.3800e-003**	**4.3800e-003**	**1.0000e-005**		**4.6700e-003**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0996					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.3086					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005		4.3800e-003	4.3800e-003	1.0000e-005		4.6700e-003
Total	**0.4083**	**2.0000e-005**	**2.0600e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**		**4.3800e-003**	**4.3800e-003**	**1.0000e-005**		**4.6700e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

West Wind Parking Storage

Imperial County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	20.00	Acre	20.00	871,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.4	**Precipitation Freq (Days)**	12
Climate Zone	15			**Operational Year**	2020
Utility Company	Imperial Irrigation District				
CO2 Intensity (lb/MWhr)	1270.9	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Construction phased over 60 day period for construction of 6-acre parking area assuming import of asphalt grindings for surface material. Site preparation phase overlapped with grading to reduce daily vehicle emissions associated with surface material delivery and material placement on-site during grading operations.

Trips and VMT - trip calculations assume use of 20-yard trucks importing 16,133 cy of material.

Grading - Assumes 6 acres disturbed daily for Phase I during site preparation and grading for dust control purposes.

Vehicle Trips - Trip estimates based on Traffic Impact Assessment
The percent of non-residential trips are estimated

Construction Off-road Equipment Mitigation - Assumes watering 3 times daily during grading for dust control.

Fleet Mix -

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterExposedAreaPM10PercentReduction	61	55
tblConstDustMitigation	WaterExposedAreaPM25PercentReduction	61	55
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	10
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	PhaseEndDate	2/14/2020	3/13/2020
tblGrading	AcresOfGrading	75.00	6.00
tblGrading	AcresOfGrading	0.00	6.00
tblGrading	MaterialImported	0.00	16,133.00
tblTripsAndVMT	HaulingTripNumber	2,017.00	807.00
tblVehicleTrips	CNW_TTP	0.00	99.00
tblVehicleTrips	CW_TTP	0.00	1.00
tblVehicleTrips	ST_TR	0.00	168.00
tblVehicleTrips	SU_TR	0.00	168.00
tblVehicleTrips	WD_TR	0.00	168.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.1674	1.8208	1.0623	2.2400e-003	9.8593	0.0825	9.9418	1.1478	0.0761	1.2238	0.0000	198.8115	198.8115	0.0537	0.0000	200.1550
Maximum	**0.1674**	**1.8208**	**1.0623**	**2.2400e-003**	**9.8593**	**0.0825**	**9.9418**	**1.1478**	**0.0761**	**1.2238**	**0.0000**	**198.8115**	**198.8115**	**0.0537**	**0.0000**	**200.1550**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.1674	1.8208	1.0623	2.2400e-003	2.1801	0.0825	2.2625	0.3406	0.0761	0.4167	0.0000	198.8113	198.8113	0.0537	0.0000	200.1548
Maximum	**0.1674**	**1.8208**	**1.0623**	**2.2400e-003**	**2.1801**	**0.0825**	**2.2625**	**0.3406**	**0.0761**	**0.4167**	**0.0000**	**198.8113**	**198.8113**	**0.0537**	**0.0000**	**200.1548**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	77.89	0.00	77.24	70.33	0.00	65.96	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-6-2020	4-5-2020	1.9612	1.9612
		Highest	1.9612	1.9612

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0745	0.0000	1.6000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	1.3374	9.1777	6.7238	0.0128	0.0000	7.2300e-003	7.2300e-003	0.0000	6.8100e-003	6.8100e-003	0.0000	1,205.4988	1,205.4988	0.2372	0.0000	1,211.4288
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**1.4119**	**9.1777**	**6.7240**	**0.0128**	**0.0000**	**7.2300e-003**	**7.2300e-003**	**0.0000**	**6.8100e-003**	**6.8100e-003**	**0.0000**	**1,205.4992**	**1,205.4992**	**0.2372**	**0.0000**	**1,211.4291**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0745	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	1.3374	9.1777	6.7238	0.0128	0.0000	7.2300e-003	7.2300e-003	0.0000	6.8100e-003	6.8100e-003	0.0000	1,205.4988	1,205.4988	0.2372	0.0000	1,211.4288
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**1.4119**	**9.1777**	**6.7240**	**0.0128**	**0.0000**	**7.2300e-003**	**7.2300e-003**	**0.0000**	**6.8100e-003**	**6.8100e-003**	**0.0000**	**1,205.4992**	**1,205.4992**	**0.2372**	**0.0000**	**1,211.4291**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/6/2020	1/31/2020	5	20	
2	Site Preparation	Site Preparation	2/1/2020	3/13/2020	5	30	
3	Grading	Grading	2/15/2020	3/27/2020	5	30	

Acres of Grading (Site Preparation Phase): 6

Acres of Grading (Grading Phase): 6

Acres of Paving: 20

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	807.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	7.30	8.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Soil Stabilizer

Replace Ground Cover

Water Exposed Area

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0331	0.3320	0.2175	3.9000e-004		0.0166	0.0166		0.0154	0.0154	0.0000	33.9986	33.9986	9.6000e-003	0.0000	34.2386
Total	**0.0331**	**0.3320**	**0.2175**	**3.9000e-004**		**0.0166**	**0.0166**		**0.0154**	**0.0154**	**0.0000**	**33.9986**	**33.9986**	**9.6000e-003**	**0.0000**	**34.2386**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.7000e-004	6.7000e-004	6.2000e-003	1.0000e-005	0.7797	1.0000e-005	0.7797	0.0779	1.0000e-005	0.0779	0.0000	0.6976	0.6976	6.0000e-005	0.0000	0.6990
Total	**8.7000e-004**	**6.7000e-004**	**6.2000e-003**	**1.0000e-005**	**0.7797**	**1.0000e-005**	**0.7797**	**0.0779**	**1.0000e-005**	**0.0779**	**0.0000**	**0.6976**	**0.6976**	**6.0000e-005**	**0.0000**	**0.6990**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0331	0.3320	0.2175	3.9000e-004		0.0166	0.0166		0.0154	0.0154	0.0000	33.9986	33.9986	9.6000e-003	0.0000	34.2385
Total	**0.0331**	**0.3320**	**0.2175**	**3.9000e-004**		**0.0166**	**0.0166**		**0.0154**	**0.0154**	**0.0000**	**33.9986**	**33.9986**	**9.6000e-003**	**0.0000**	**34.2385**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.7000e-004	6.7000e-004	6.2000e-003	1.0000e-005	0.1654	1.0000e-005	0.1654	0.0206	1.0000e-005	0.0206	0.0000	0.6976	0.6976	6.0000e-005	0.0000	0.6990
Total	**8.7000e-004**	**6.7000e-004**	**6.2000e-003**	**1.0000e-005**	**0.1654**	**1.0000e-005**	**0.1654**	**0.0206**	**1.0000e-005**	**0.0206**	**0.0000**	**0.6976**	**0.6976**	**6.0000e-005**	**0.0000**	**0.6990**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2758	0.0000	0.2758	0.1496	0.0000	0.1496	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0612	0.6363	0.3227	5.7000e-004		0.0330	0.0330		0.0303	0.0303	0.0000	50.1460	50.1460	0.0162	0.0000	50.5515
Total	**0.0612**	**0.6363**	**0.3227**	**5.7000e-004**	**0.2758**	**0.0330**	**0.3087**	**0.1496**	**0.0303**	**0.1799**	**0.0000**	**50.1460**	**50.1460**	**0.0162**	**0.0000**	**50.5515**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.1800e-003	0.0963	0.0129	3.1000e-004	5.7474	3.1000e-004	5.7477	0.5744	2.9000e-004	0.5747	0.0000	29.5921	29.5921	1.2200e-003	0.0000	29.6226
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5700e-003	1.2000e-003	0.0112	1.0000e-005	1.4035	1.0000e-005	1.4035	0.1402	1.0000e-005	0.1402	0.0000	1.2556	1.2556	1.0000e-004	0.0000	1.2582
Total	**3.7500e-003**	**0.0975**	**0.0240**	**3.2000e-004**	**7.1509**	**3.2000e-004**	**7.1512**	**0.7146**	**3.0000e-004**	**0.7149**	**0.0000**	**30.8478**	**30.8478**	**1.3200e-003**	**0.0000**	**30.8808**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1241	0.0000	0.1241	0.0673	0.0000	0.0673	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0612	0.6363	0.3227	5.7000e-004		0.0330	0.0330		0.0303	0.0303	0.0000	50.1460	50.1460	0.0162	0.0000	50.5514
Total	**0.0612**	**0.6363**	**0.3227**	**5.7000e-004**	**0.1241**	**0.0330**	**0.1571**	**0.0673**	**0.0303**	**0.0976**	**0.0000**	**50.1460**	**50.1460**	**0.0162**	**0.0000**	**50.5514**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.1800e-003	0.0963	0.0129	3.1000e-004	1.2199	3.1000e-004	1.2202	0.1520	2.9000e-004	0.1523	0.0000	29.5921	29.5921	1.2200e-003	0.0000	29.6226
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5700e-003	1.2000e-003	0.0112	1.0000e-005	0.2977	1.0000e-005	0.2977	0.0371	1.0000e-005	0.0371	0.0000	1.2556	1.2556	1.0000e-004	0.0000	1.2582
Total	**3.7500e-003**	**0.0975**	**0.0240**	**3.2000e-004**	**1.5177**	**3.2000e-004**	**1.5180**	**0.1891**	**3.0000e-004**	**0.1894**	**0.0000**	**30.8478**	**30.8478**	**1.3200e-003**	**0.0000**	**30.8808**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0935	0.0000	0.0935	0.0500	0.0000	0.0500	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0668	0.7530	0.4794	9.3000e-004		0.0326	0.0326		0.0300	0.0300	0.0000	81.7264	81.7264	0.0264	0.0000	82.3872
Total	**0.0668**	**0.7530**	**0.4794**	**9.3000e-004**	**0.0935**	**0.0326**	**0.1261**	**0.0500**	**0.0300**	**0.0800**	**0.0000**	**81.7264**	**81.7264**	**0.0264**	**0.0000**	**82.3872**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7400e-003	1.3300e-003	0.0124	2.0000e-005	1.5594	1.0000e-005	1.5595	0.1558	1.0000e-005	0.1558	0.0000	1.3951	1.3951	1.1000e-004	0.0000	1.3980
Total	**1.7400e-003**	**1.3300e-003**	**0.0124**	**2.0000e-005**	**1.5594**	**1.0000e-005**	**1.5595**	**0.1558**	**1.0000e-005**	**0.1558**	**0.0000**	**1.3951**	**1.3951**	**1.1000e-004**	**0.0000**	**1.3980**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0421	0.0000	0.0421	0.0225	0.0000	0.0225	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0668	0.7530	0.4794	9.3000e-004		0.0326	0.0326		0.0300	0.0300	0.0000	81.7263	81.7263	0.0264	0.0000	82.3871
Total	**0.0668**	**0.7530**	**0.4794**	**9.3000e-004**	**0.0421**	**0.0326**	**0.0747**	**0.0225**	**0.0300**	**0.0525**	**0.0000**	**81.7263**	**81.7263**	**0.0264**	**0.0000**	**82.3871**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7400e-003	1.3300e-003	0.0124	2.0000e-005	0.3308	1.0000e-005	0.3308	0.0412	1.0000e-005	0.0412	0.0000	1.3951	1.3951	1.1000e-004	0.0000	1.3980
Total	**1.7400e-003**	**1.3300e-003**	**0.0124**	**2.0000e-005**	**0.3308**	**1.0000e-005**	**0.3308**	**0.0412**	**1.0000e-005**	**0.0412**	**0.0000**	**1.3951**	**1.3951**	**1.1000e-004**	**0.0000**	**1.3980**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.3374	9.1777	6.7238	0.0128	0.0000	7.2300e-003	7.2300e-003	0.0000	6.8100e-003	6.8100e-003	0.0000	1,205.4988	1,205.4988	0.2372	0.0000	1,211.4288
Unmitigated	1.3374	9.1777	6.7238	0.0128	0.0000	7.2300e-003	7.2300e-003	0.0000	6.8100e-003	6.8100e-003	0.0000	1,205.4988	1,205.4988	0.2372	0.0000	1,211.4288

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Non-Asphalt Surfaces	3,360.00	3,360.00	3360.00		
Total	3,360.00	3,360.00	3,360.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Non-Asphalt Surfaces	6.70	5.00	8.90	1.00	0.00	99.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Non-Asphalt Surfaces	0.503420	0.033264	0.160883	0.129541	0.018929	0.005318	0.019165	0.118376	0.003239	0.001168	0.005214	0.000745	0.000738

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0745	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Unmitigated	0.0745	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0563					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Total	**0.0745**	**0.0000**	**1.8000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**3.6000e-004**	**3.6000e-004**	**0.0000**	**0.0000**	**3.8000e-004**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0563					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Total	**0.0745**	**0.0000**	**1.8000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**3.6000e-004**	**3.6000e-004**	**0.0000**	**0.0000**	**3.8000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EEC ORIGINAL PKG

LINSCOTT
LAW &
GREENSPAN
engineers

TRANSPORTATION IMPACT STUDY

WEST WIND PARKING STORAGE

Imperial County, California
May 7, 2019

LLG Ref. 3-19-3083

Linscott, Law & Greenspan, Engineers
4542 Ruffner Street
Suite 100
San Diego, CA 92111
858.300.8800 T
858.300.8810 F
www.llgengineers.com

TABLE OF CONTENTS

APPENDICES

APPENDIX	
A.	Intersection and Segment Manual Count Sheets
B.	Intersection Methodology and Analysis Sheets
C.	County of Imperial Roadway Classification Table
D.	Existing Intersection Calculation Sheets
E.	PCE Factor and Caltrans Historical Traffic Count Data Comparison
F.	Existing + Project Intersection Calculation Sheets
G.	Existing +Project + Cumulative Projects Intersection Calculation Sheets

LIST OF FIGURES

LIST OF TABLES

TRANSPORTATION IMPACT STUDY

WEST WIND PARKING STORAGE

Imperial County, California
May 7, 2019

1.0 INTRODUCTION

Linscott, Law & Greenspan Engineers (LLG) has been retained to assess the potential traffic impacts associated with the West Wind Parking Storage project. The project is located on the southeast corner of the SR 111 / Heber Road intersection in the County of Imperial.

The project proposes to expand the site footprint to accommodate an increased need for storage of containers and to reduce the potential for accidents within the project site. This transportation report addresses the potential transportation impacts associated with the proposed project.

The following sections are included in this report:

- Project Description
- Existing Conditions Discussion
- Analysis Approach and Methodology
- Significance Criteria
- Analysis of Existing Conditions
- Trip Generation/Distribution/Assignment
- Cumulative Traffic
- Analysis of Near-Term Scenarios
- Site Access and Circulation Review
- Significance of Impacts and Mitigation Measures

2.0 PROJECT DESCRIPTION

2.1 Project Location

The project is located on the southeast corner of the SR 111 / Heber Road intersection in the County of Imperial.

Figure 2–1 includes a project vicinity map and ***Figure 2–2*** includes a project area map.

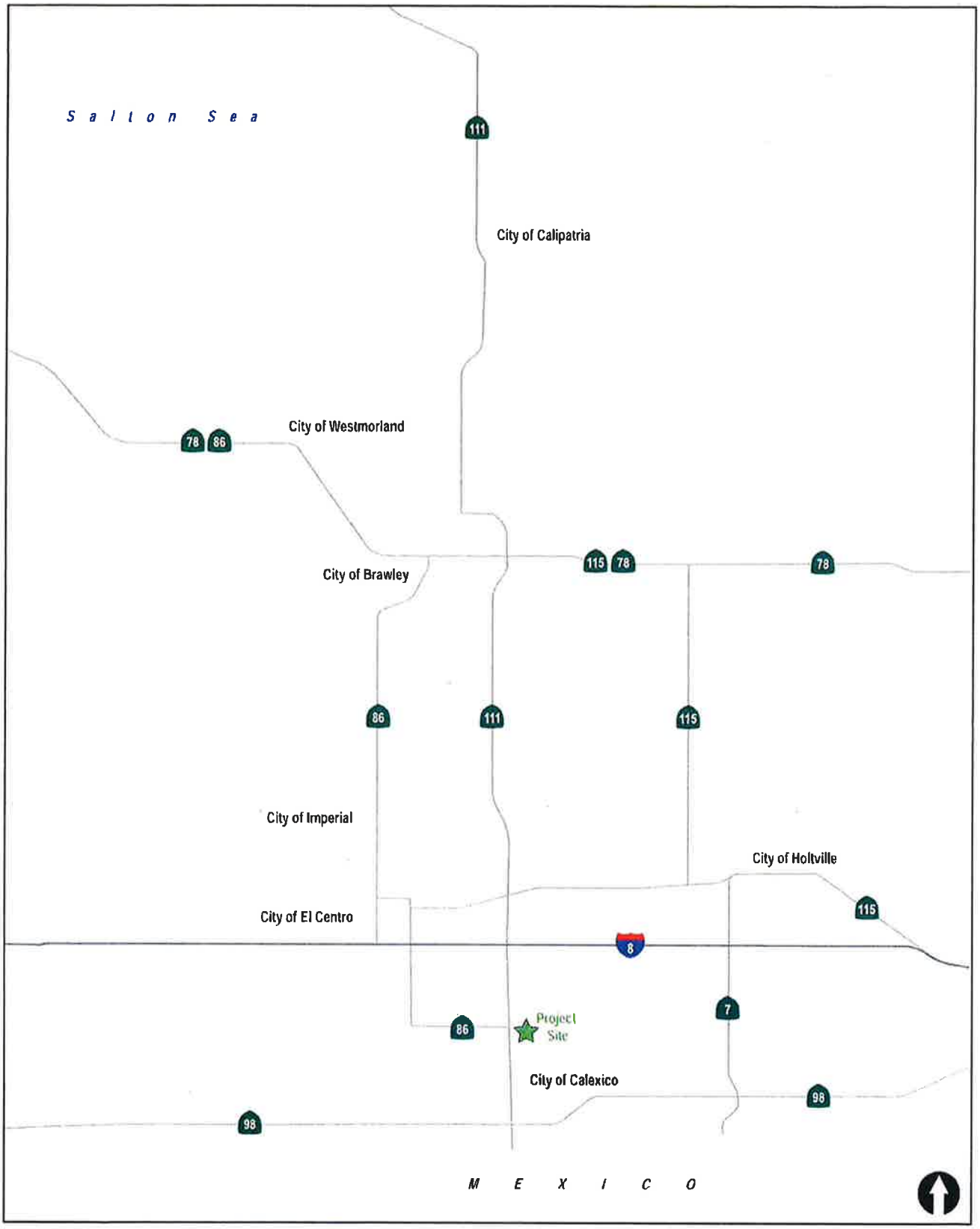
2.2 Project Description

West Wind Parking Storage, Inc. currently operates a freight storage facility. The facility houses numerous trucking companies that deliver and store freight on-site. Currently, the facility is running out of available space. The project proposes to expand their footprint to accommodate an increased need for storage of containers.

Figure 2–3 shows the conceptual site plan for the project.

2.3 Project Access

Access to the project site is currently located approximately 800 feet east of the E Heber Road / SR 111 intersection. As part of the proposed expansion, the project driveway will be relocated eastward to the E Heber Road / Yourman Road intersection as the fourth leg (south leg), and convert the current driveway to emergency access only.



LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 04/29/19

Figure 2-1

Vicinity Map

WEST WIND PARKING

EEC ORIGINAL PKG

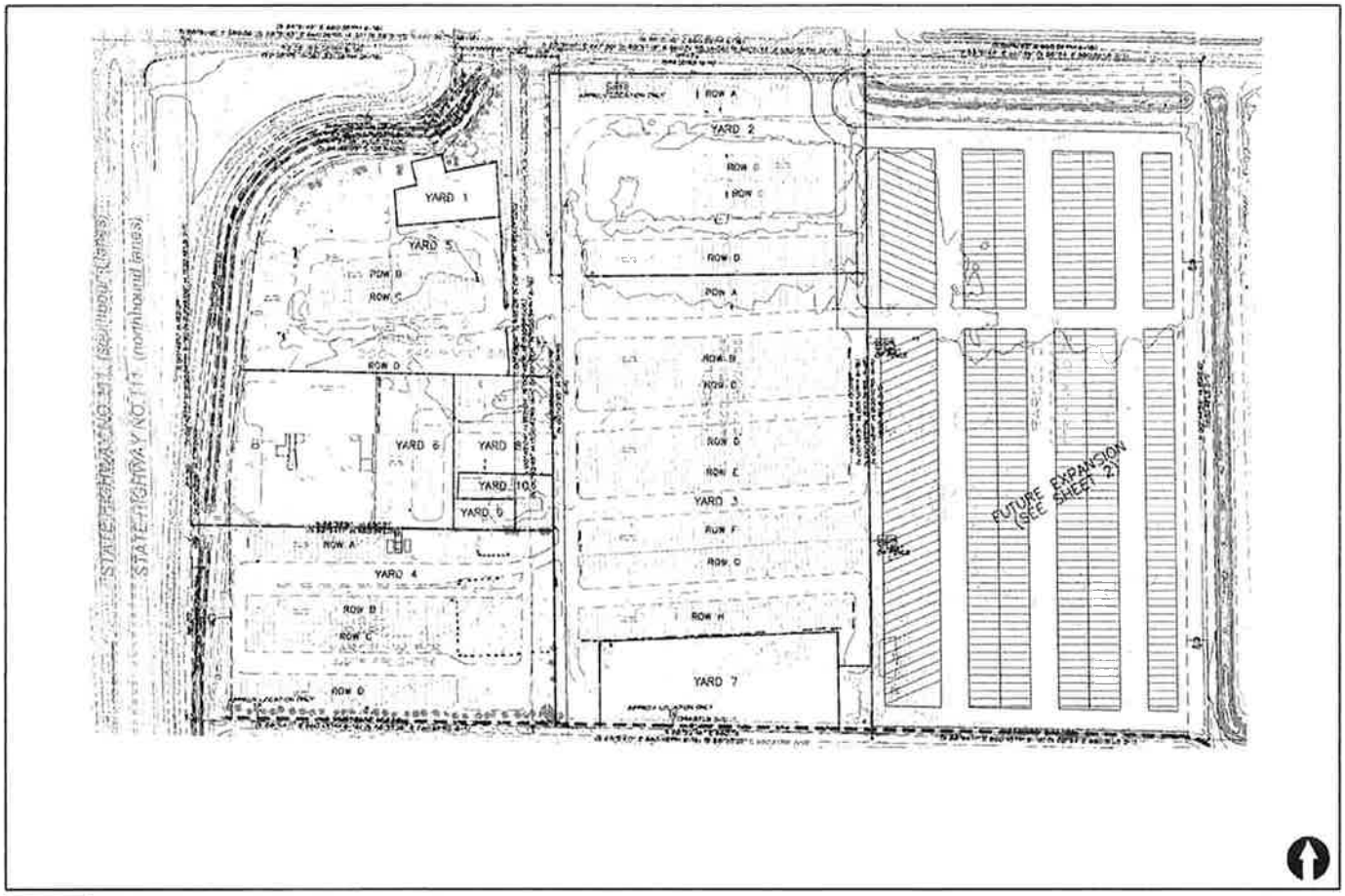
LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/02/19

Figure 2-2

Project Area Map

WEST WIND PARKING



LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/02/19

Figure 2-3

Site Plan

WEST WIND PARKING

3.0 EXISTING CONDITIONS

The intersections and street segments included in the study area are listed below. These locations were chosen since they will carry the majority of project traffic.

Intersections

- E Heber Road / SR 111
- E Heber Road / Frontage Road
- E Heber Road / Project Driveway
- E Heber Road / Yourman Road
- Frontage Road / Jenco Productions Driveway

Street Segments

E Heber Road

- West of SR 111
- SR 111 to Frontage Road
- Frontage Road to Yourman Road

Frontage Road

- North of E Heber Road
- South of E Heber Road

3.1 Existing Transportation Conditions

The following is a description of the existing street network in the study area.

State Route 111 (SR 111) is classified as a State Highway in the Imperial County Circulation Element. SR 111 is a north-south facility located to the west of the project site. In the vicinity of the project, SR 111 is a four-lane divided roadway. The posted speed limit is 65 mph. No bike lanes or bus stops are provided and curbside parking is prohibited.

Heber Road is classified as a Local Collector in the Imperial County Circulation Element. In the vicinity of the project, Heber Road is an east-west two-lane undivided roadway. The posted speed limit is 55 mph. No bike lanes or bus stops are provided and curbside parking is prohibited.

Frontage Road is an unclassified roadway in the Imperial County Circulation Element. In the vicinity of the project, Frontage Road is a north-south two-lane undivided roadway located adjacent to the project site. No bike lanes or bus stops are provided.

Yourman Road is an unclassified roadway in the Imperial County Circulation Element. In the vicinity of the project, Yourman Road is a north-south four-lane undivided roadway located opposite of the proposed project driveway, which is to be constructed and aligned with Yourman Road to

allow compatibility with Imperial County's planned extension of Yourman Road south of E Heber Road and signalization of the intersection. No bike lanes or bus stops are provided.

Figure 3–1 depicts the existing traffic conditions and the study area intersections and street segments graphically.

3.2 Existing Traffic Volumes

Existing traffic volumes were conducted by manually counting the AM and PM peak hour volumes at study area intersections, and laying tube counters along study area street segments to count daily volumes.

Peak Hour Volumes– Existing weekday AM and PM peak hour (6:30-8:30 AM and 3:30-5:30 PM) traffic volume counts were commissioned at the study area intersections on Tuesday, April 16, 2019.

Daily Volumes– Existing street segment Average Daily Traffic (ADT) volume counts were commissioned on Tuesday, April 16, 2019.

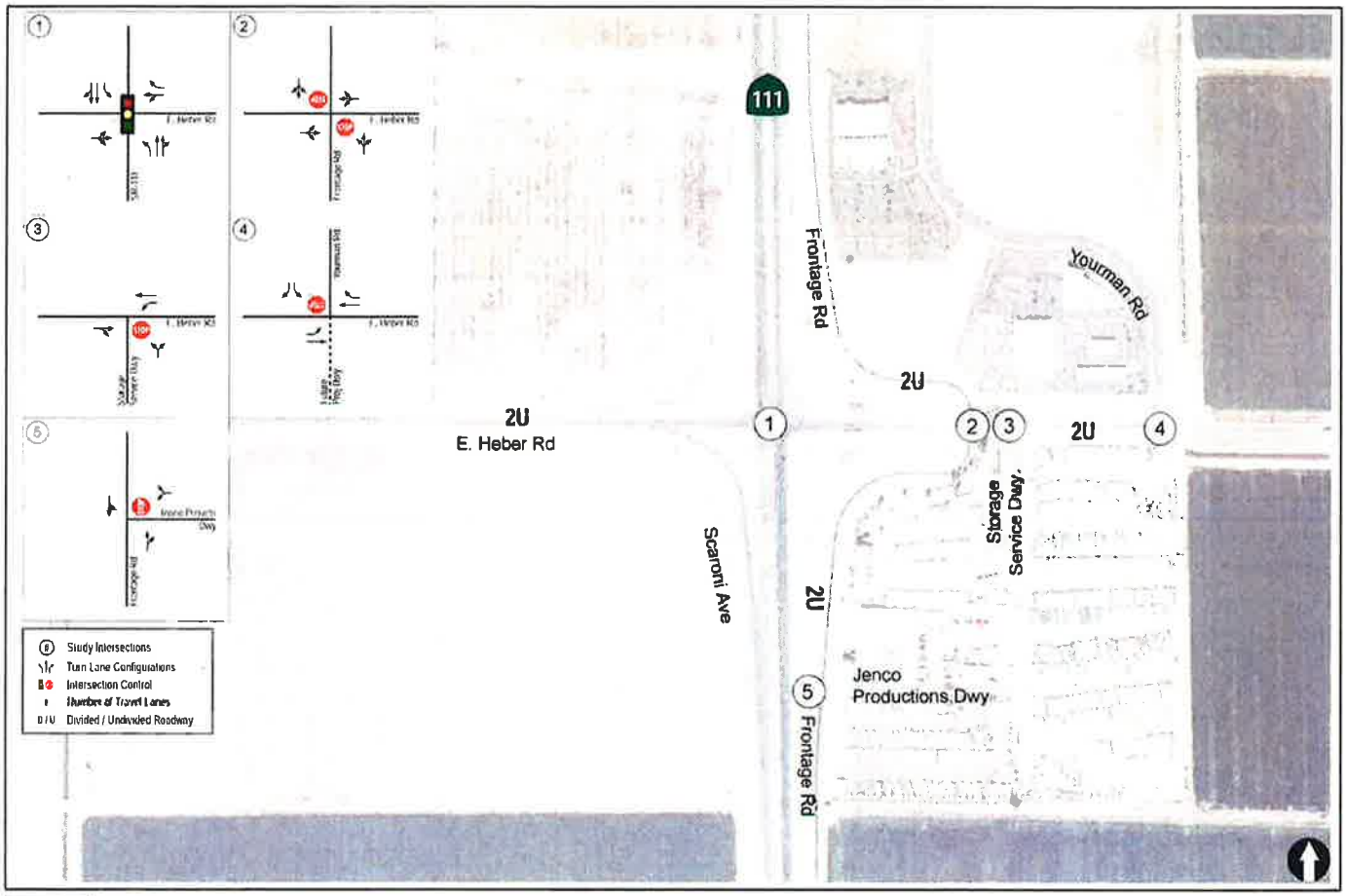
Table 3–1 is a summary of the existing street segment average daily traffic within the project study area. ***Figure 3–2*** depicts the peak hour intersection turning movement and 24-hour street segment volumes at the study area intersections and segments. ***Appendix A*** contains copies of the intersection and street segment count sheets.

TABLE 3–1
EXISTING TRAFFIC VOLUMES

Street Segment	ADT[a]	Date	Source
E Heber Road			
West of SR 111	5,560	April 2019	LLG
SR 111 to Frontage Road	5,650	April 2019	LLG
Frontage Road to Yourman Road	5,680	April 2019	LLG
Frontage Road			
North of E Heber Road	300	April 2019	LLG
South of E Heber Road	1,330	April 2019	LLG

Footnotes:

a Average Daily Traffic Volumes



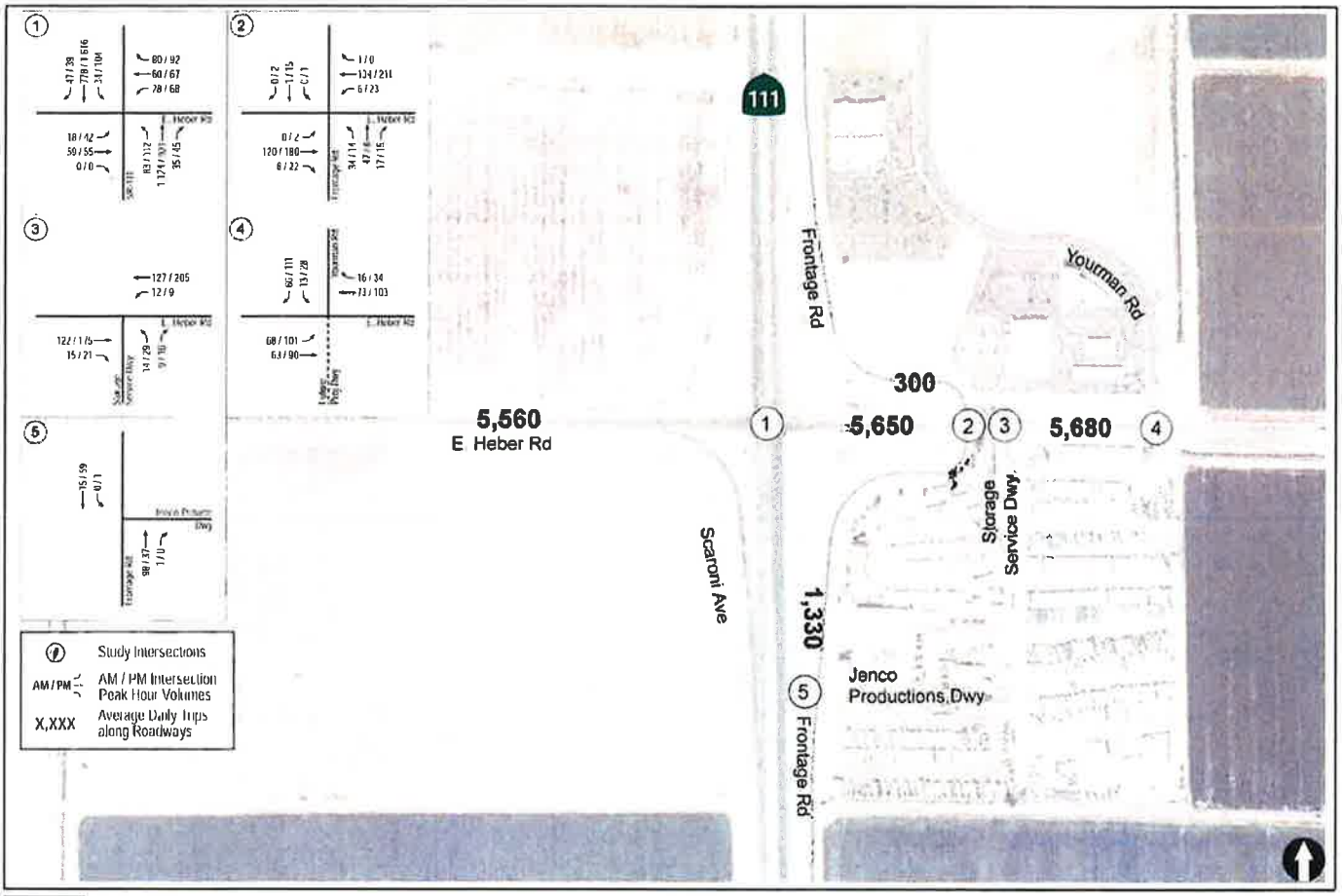
LINSCOTT LAW & GREENSPAN engineers

N:\13083\Figures
Date: 05/06/19

Figure 3-1

Existing Conditions Diagram

WEST WIND PARKING



LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/06/19

Figure 3-2

Existing Traffic Volumes

WEST WIND PARKING

4.0 ANALYSIS APPROACH AND METHODOLOGY

Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. Level of service provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. Level of service designation is reported differently for signalized intersections, unsignalized intersections and roadway segments.

4.1 Intersections

Signalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 19 of the *Highway Capacity Manual (HCM)*, with the assistance of the *Synchro* version 10 computer software. For the purposes of this analysis, the latest and current HCM 6th edition using Synchro software was used. Signalized intersection calculation worksheets and a more detailed explanation of the methodology are attached in ***Appendix B***.

Unsignalized intersections were analyzed under AM and PM peak hour conditions. Average vehicle delay and Levels of Service (LOS) was determined based upon the procedures found in Chapter 20 and 21 of the latest *Highway Capacity Manual (HCM)*, with the assistance of the *Synchro* 10 computer software. Unsignalized intersection calculation worksheets and a more detailed explanation of the methodology are attached in *Appendix B*.

4.2 Street Segments

Street segments were analyzed based upon the comparison of ADT to the County of Imperial's *Roadway Classifications, Levels of Service (LOS) and Average Daily Traffic (ADT)* table (see ***Table 4–1*** below). *Table 4–1* provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics. Segment analysis is a comparison of ADT volumes and an approximate daily capacity on the subject roadway.

TABLE 4-1
IMPERIAL COUNTY STANDARD STREET CLASSIFICATION AVERAGE DAILY VEHICLE TRIPS

Road		Level of Service W/ADT*				
Class	X-Section	A	B	C	D	E
Expressway	128 / 210	30,000	42,000	60,000	70,000	80,000
Prime Arterial	106 / 136	22,200	37,000	44,600	50,000	57,000
Minor Arterial	82 / 102	14,800	24,700	29,600	33,400	37,000
Major Collector (Collector)	64 / 84	13,700	22,800	27,400	30,800	34,200
Minor Collector (Local Collector)	40 / 70	1,900	4,100	7,100	10,900	16,200
Residential Street	40 / 60	*	*	< 1,500	*	*
Residential Cul-de-Sac / Loop Street	40/60	*	*	< 1,500	*	*
Industrial Collector	76 / 96	5,000	10,000	14,000	17,000	20,000
Industrial Local Street	44 / 64	2,500	5,000	7,000	8,500	10,000

* Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors

5.0 SIGNIFICANCE CRITERIA

The County of Imperial does not have published significance criteria. However, the County General Plan does state that the LOS goal for intersections and roadway segments is to operate at LOS C or better. Therefore, if an intersection or segment degrades from LOS C or better to LOS D or worse with the addition of project traffic, the impact is considered significant. If the location operates at LOS D or worse with and without project traffic, the impact is considered significant if the project causes the intersection delta to increase by more than two (2) seconds, or the volume to capacity (V/C) ratio to increase by more than 0.02.

A project is considered to have a significant impact if the new project traffic decreases the operations of surrounding roadways by a defined threshold. The defined thresholds for roadway segments and intersections are defined in ***Table 5–1*** below. If the project exceeds the thresholds in *Table 5–1,* then the project may be considered to have a significant project impact. A feasible mitigation measure will need to be identified to return the impact within the thresholds (pre-project + allowable increase) or the impact will be considered significant and unmitigated.

TABLE 5–1
TRAFFIC IMPACT SIGNIFICANT THRESHOLDS

Level of Service with Project [a]	Allowable Increase Due to Project Impacts [b]	
	Roadway Segments	Intersections
	V/C	Delay (sec.)
D, E & F	0.02	2

Footnotes:

a All level of service measurements are based upon HCM procedures for peak-hour conditions. However, V/C ratios for Roadway Segments may be estimated on an ADT/24-hour traffic volume basis (using *Table 4-1* or a similar LOS chart for each jurisdiction). The acceptable LOS for roadways and intersections is generally "D" ("C" for undeveloped or not densely developed locations per jurisdiction definitions).

b If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are deemed to be significant. These impact changes may be measured from appropriate computer programs or expanded manual spreadsheets. The project applicant shall then identify feasible mitigations (within the Traffic Impact Study [TIS] report) that will maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see note a above), or if the project adds a significant amount of peak hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating significant impact changes.

General Notes:

1. V/C = Volume to Capacity Ratio
2. Delay = Average stopped delay per vehicle measured in seconds for intersections
3. LOS = Level of Service

6.0 Analysis of Existing Conditions

The analysis of existing conditions includes the assessment of the study area intersections and street segments using the methodologies described in *Section 4.0*.

6.1 Peak Hour Intersection Operations

Table 6–1 summarizes the existing intersections level of service. As seen in *Table 6–1*, all study area intersections are calculated to currently operate at LOS C or better with exception to the following intersection:

- E Heber Road / SR 111 (LOS D during the PM peak hour)

Appendix D contains the Existing intersection calculation sheets.

6.2 Daily Street Segment Operations

Table 6–2 summarizes the existing roadway segment operations. As seen in *Table 6–2*, all study area street segments are calculated to currently operate at LOS C or better.

TABLE 6–1
EXISTING INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing	
			Delay[a]	LOS[b]
1. E Heber Rd / SR 111	Signal	AM	19.8	B
		PM	35.6	D
2. E Heber Rd / Frontage Rd	TWSC[c]	AM	12.6	B
		PM	13.9	B
3. E Heber Rd / Project driveway	TWSC[c]	AM	10.7	B
		PM	11.9	B
4. E Heber Rd / Yourman Road	TWSC[c]	AM	11.1	B
		PM	12.7	B
5. Frontage Rd / Jenco Productions driveway	TWSC[c]	AM	7.5	A
		PM	7.4	A

Footnotes:

a Average delay expressed in seconds per vehicle.

b Level of Service.

c TWSC – Two-Way Stop Controlled intersection. Minor street left turn delay is reported.

SIGNALIZED		UNSIGNALIZED	
DELAY/LOS THRESHOLDS		DELAY/LOS THRESHOLDS	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

TABLE 6-2
EXISTING STREET SEGMENT OPERATIONS

Street Segment	Functional Classification	Capacity (LOS E) [a]	ADT [b]	LOS [c]	V/C [d]
E Heber Road					
West of SR 111	2-Lane Local Collector	16,200	5,560	C	0.343
SR 111 to Frontage Road	2-Lane Local Collector	16,200	5,650	C	0.349
Frontage Road to Yourman Road	2-Lane Local Collector	16,200	5,680	C	0.351
Frontage Road					
North of E Heber Road	2-Lane Industrial Local Street	10,000	300	A	0.030
South of E Heber Road	2-Lane Industrial Local Street	10,000	1,330	A	0.133

Footnotes:

a Capacities based on County of Imperial Roadway Classification Table.

b Average Daily Traffic Volumes

c Level of Service

d Volume to Capacity

7.0 TRIP GENERATION/DISTRIBUTION/ASSIGNMENT

7.1 Trip Generation

The project trip generation was calculated using the estimated quantities provided by the applicant. A brief description of heavy vehicles and employee vehicles are provided below.

Heavy Vehicles – approximately 40 additional heavy vehicles are assumed to utilize the storage facility after expansion.

The West Wing Parking Storage, Inc. is open 24 hours. Heavy vehicles were assumed to arrive and depart within an 8-hour work day which would be approximately 12.5% in each peak hour as the truck trips are expected to be relatively equally distributed throughout the day. The assumed percent of ADT to occur during the peak hour for truck traffic was conservatively assumed as 15%. In addition, a passenger car equivalent (PCE) factor of 2.0 for trucks is used to account for the effects of heavy vehicles in the traffic flow.

According to Highway Capacity Manual 6th Edition, PCE is defined as the number of passenger cars that are displaced by a single heavy vehicle of a particular type under the prevailing traffic conditions. Heavy vehicles have a greater traffic impact than passenger cars since:

> They are larger than passenger cars, and therefore, occupy more roadway space; and their performance characteristics are generally inferior to passenger cars, leading to the formation of downstream gaps in the traffic stream, which cannot always be effectively filled by normal passing maneuvers.

Exhibit 12-25, PCE's for Heavy Vehicles in General Terrain Segments indicate a passenger car equivalents of 2.0 for trucks on a "level" terrain.

Employee Vehicles – approximately 4 additional employee vehicles are assumed to work with the expanded storage facility. To be conservative, all employees are expected to arrive during the AM peak hour and leave during the PM peak hour.

Table 7–1 tabulates the total project traffic generation. The total project is calculated to generate approximately 168 ADT with 28 AM peak hour trips (16 inbound / 12 outbound) and 28 PM peak hour trips (12 inbound / 16 outbound).

7.2 Trip Distribution/Assignment

The project trip distribution and assignment was developed based on coordination with the applicant and LLG's experience working on other projects in the area, existing roadway network and travel patterns, a working knowledge of the local transportation system and a detailed review of the proposed expansion. According to the applicant, the additional traffic due to the project's expansion will originate from the south, driving north on HWY 111 coming from Mexicali. Also, both existing and proposed project traffic will be relocated to the E Heber Road / Yourman Road intersection as

the fourth leg (south leg). The current driveway on Heber Road will be converted to emergency access only.

Figure 7–1 shows the Project trip distribution percentages. ***Figure 7–2*** shows the Project traffic volumes. ***Figure 7–3*** shows the Existing + Project traffic volumes.

TABLE 7–1
PROJECT TRIP GENERATION

Use	Quantity[a]	PCE[b]	Daily Trips		AM Peak Hour				PM Peak Hour					
					% of ADT	Split		Volume			% of ADT	Split		Volume		
			Rate	ADT[c]		In : Out		In	Out	Total		In : Out		In	Out	Total
Heavy Vehicles[d]	40	2.0	2.0 / vehicle	160	15%	50% : 50%		12	12	24	15%	50% : 50%		12	12	24
Employee Vehicles[e]	4	1.0	2.0 / vehicle	8	50%	100% : 0%		4	0	4	50%	0% : 100%		0	4	4
Total				***168***				***16***	***12***	***28***				***12***	***16***	***28***

Footnotes:

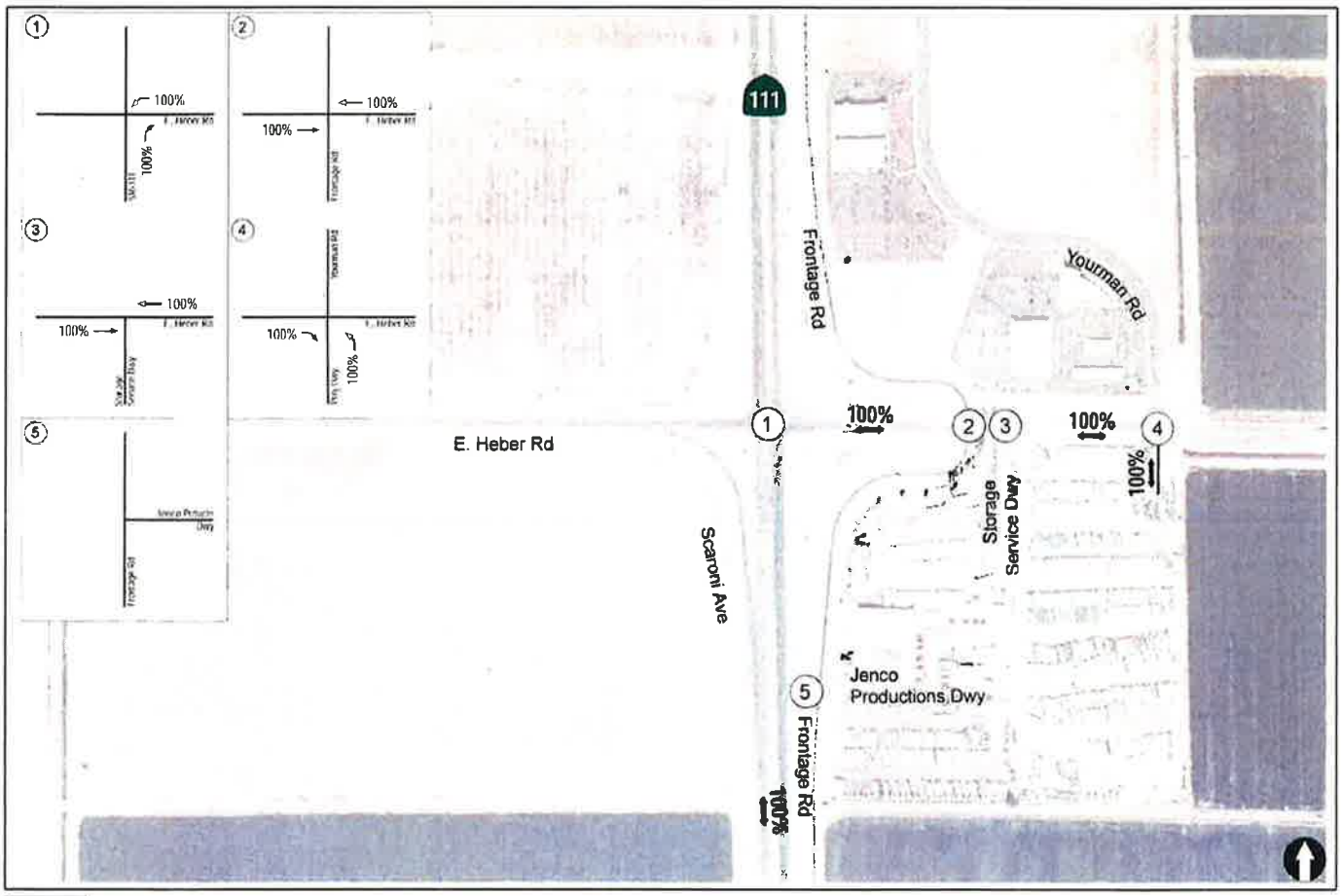
a Additional daily trucks and workers due to expansion provided by applicant

b Passenger Car Equivalent

c Average Daily Trips

d Heavy vehicles are expected to arrive at regular intervals throughout an 8-hour work day

e All workers assumed to arrive during the AM peak hour and leave during the PM peak hour



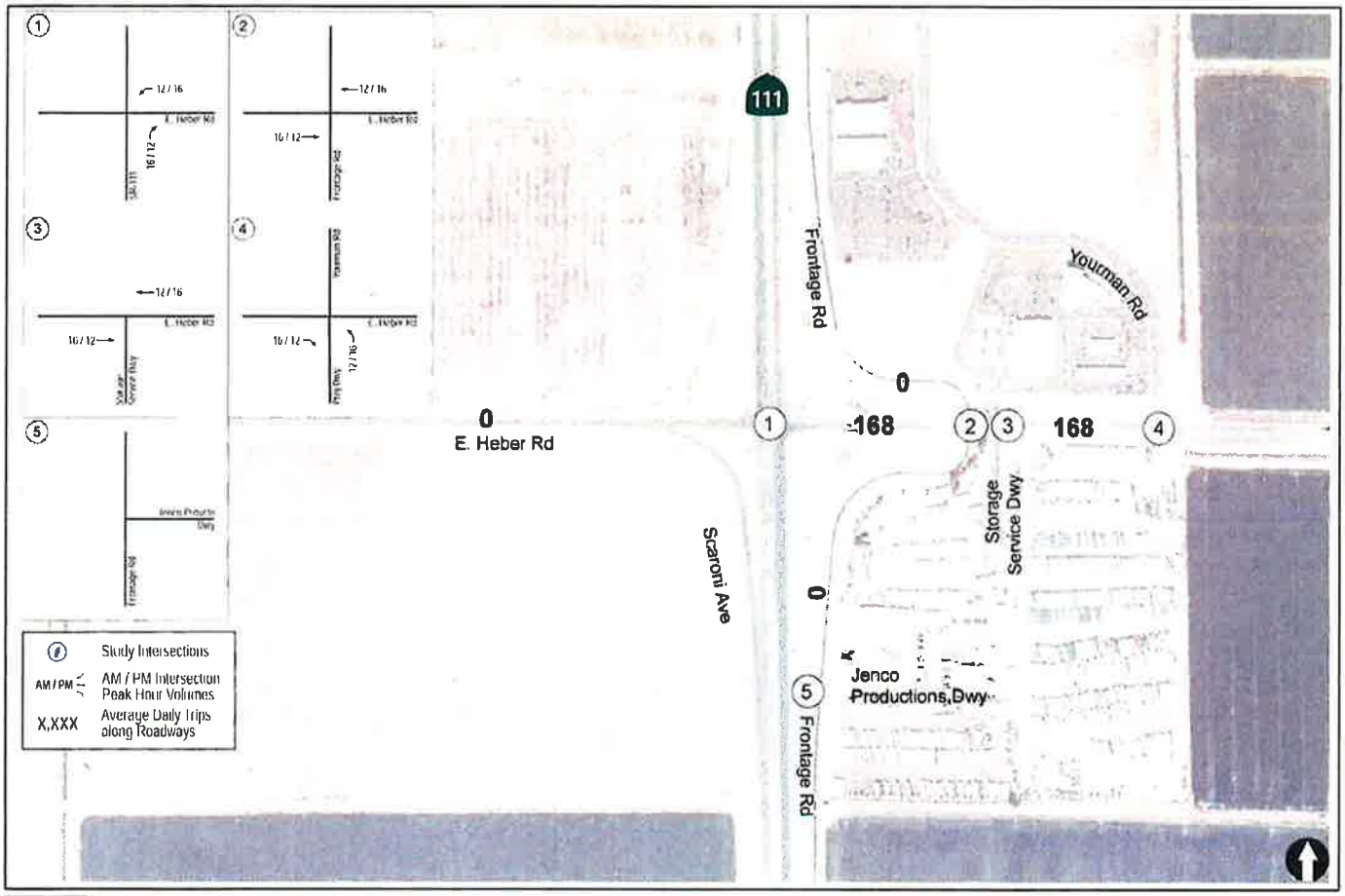
LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/06/19

Figure 7-1

Project Traffic Distribution

WEST WIND PARKING



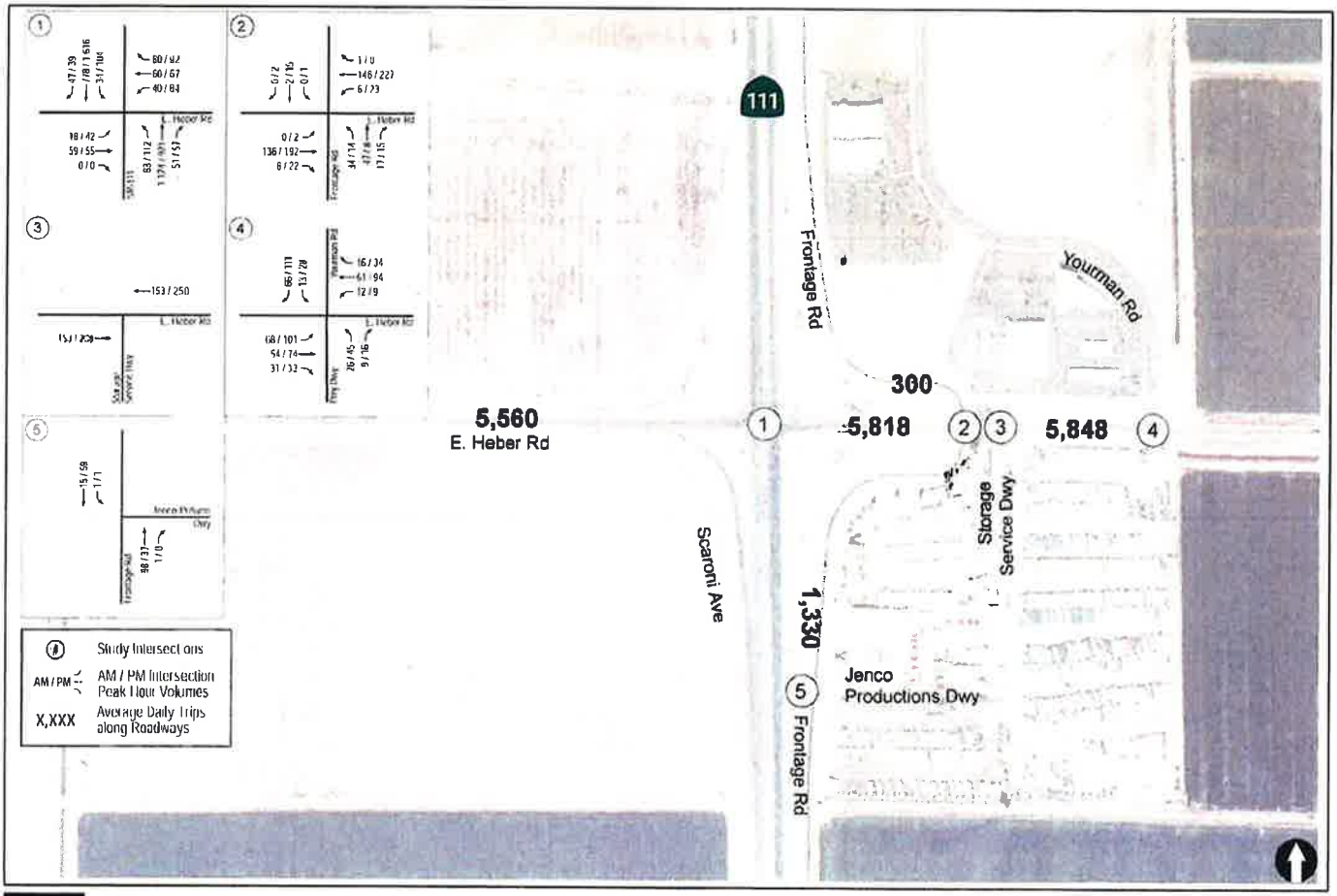
LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/06/19

Figure 7-2

Project Traffic Volumes

WEST WIND PARKING



LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/06/19

Figure 7-3

Existing + Project Traffic Volumes

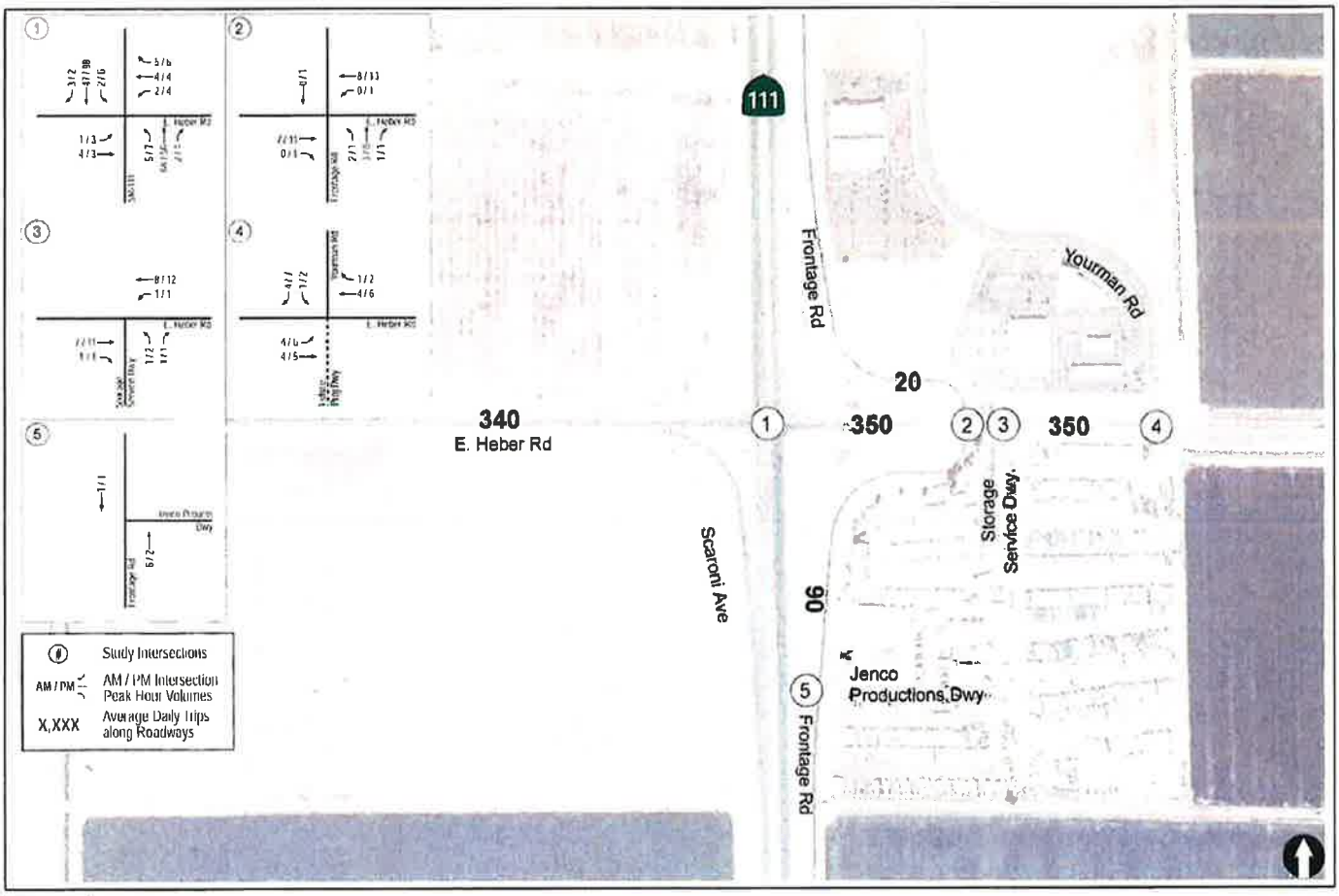
WEST WIND PARKING

8.0 CUMULATIVE TRAFFIC

Cumulative traffic is generated by other projects in the area and general growth between the date of existing data collection and the time of the Project's expected opening day, thus adding traffic to the local circulation system.

In order to account for background growth in traffic volumes, a comparison of the Caltrans historical traffic count data was conducted. Based on a review of historical traffic volume data between Year 2013 and Year 2017 for SR 111 just north and south of E Heber Road, traffic volumes were shown to have an increase of approximately 3% each year. Therefore, a 3% growth for 2 years was applied onto the existing traffic volumes to represent the Near-Term scenario. At the time of preparation of this study, Year 2017 counts were the most recent available data.

Figure 8–1 depicts the Cumulative Projects Traffic Volumes. ***Figure 8–2*** depicts the Existing + Project + Cumulative Projects traffic volumes. *Appendix E* contains the Caltrans historical traffic count data comparison.



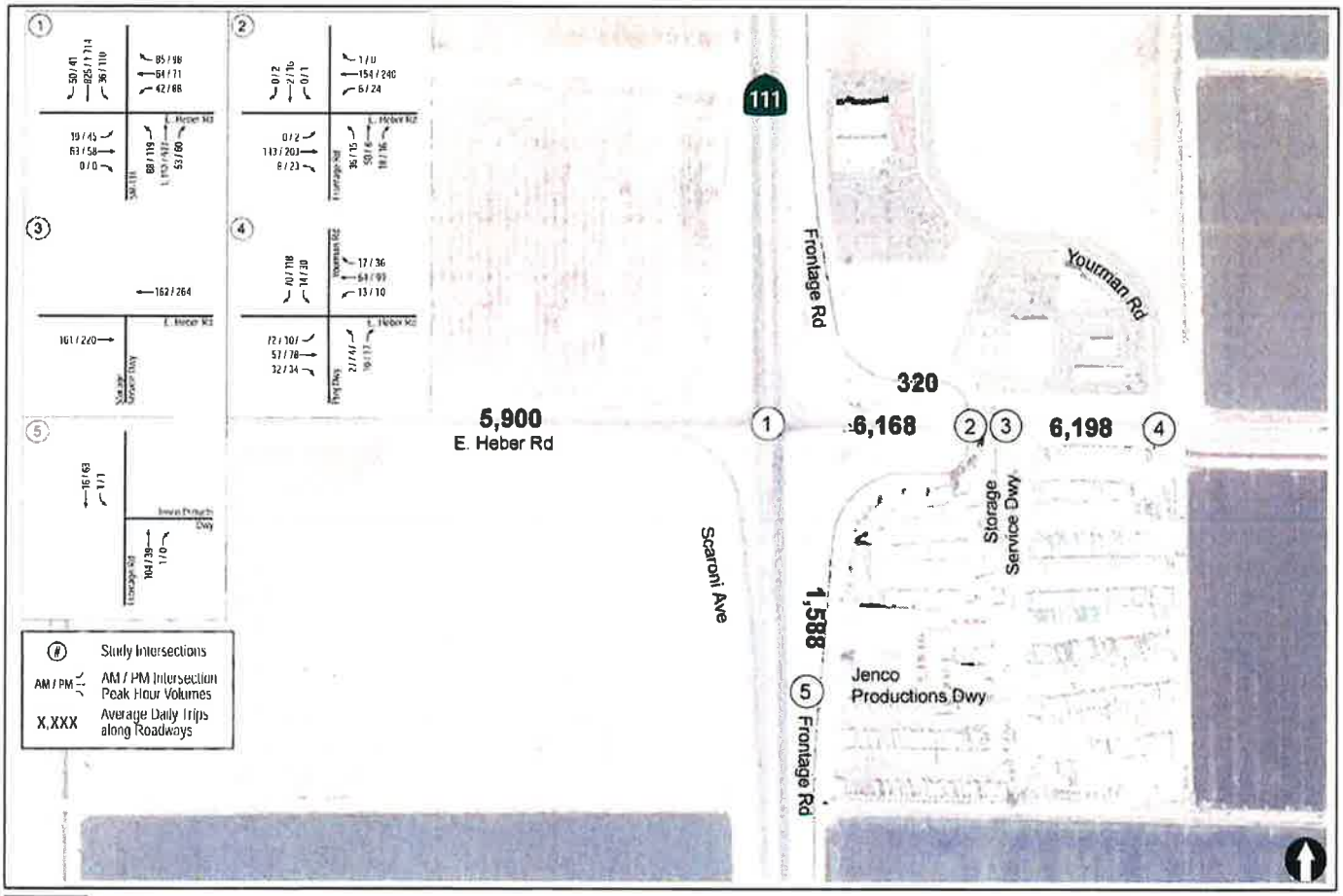
LINSCOTT LAW & GREENSPAN engineers

N:\30831\Figures
Date: 05/06/19

Figure 8-1

Cumulative Traffic Volumes

WEST WIND PARKING



LINSCOTT LAW & GREENSPAN engineers

N:\3083\Figures
Date: 05/06/19

Figure 8-2

Existing + Project + Cumulative Traffic Volumes

WEST WIND PARKING

9.0 ANALYSIS OF NEAR-TERM SCENARIOS

9.1 Existing + Project Conditions

Intersection and street segment analyses were conducted under Existing + Project conditions.

9.1.1 *Peak Hour Intersection Operations*

Table 9–1 summarizes the *Existing + Project* intersections level of service. As shown in *Table 9–1*, with the addition of project traffic, all study area intersections are calculated to continue to operate at LOS D or better with exception to the following intersection:

- E Heber Road / SR 111 (LOS D during the PM peak hour)

Based on the significance criteria, ***no* significant impact** is identified on the above intersection as the project contribution to this intersection does not exceed the allowable threshold.

Appendix F contains the Existing + Project intersection calculation sheets.

9.1.2 *Daily Street Segment Operations*

Table 9–2 summarizes the *Existing + Project* roadway segment level of service. As shown in *Table 9–2*, with the addition of project traffic, all study area street segments are calculated to continue to operate at LOS C or better.

9.2 Existing + Project + Cumulative Projects

Intersection and street segment analyses were conducted under Existing + Project + Cumulative Projects conditions.

9.2.1 *Peak Hour Intersection Operations*

Table 9–1 summarizes the *Existing + Project + Cumulative Projects* intersections level of service. As shown in *Table 9–1*, with the addition of cumulative and project traffic, all study area intersections are calculated to continue to operate at LOS D or better with exception to the following intersection:

- E Heber Road / SR 111 (LOS D during the PM peak hour)

Appendix G contains the Existing + Project + Cumulative Projects intersection calculation sheets.

9.2.2 *Daily Street Segment Operations*

Table 9–2 summarizes the *Existing + Project + Cumulative Projects* roadway segment level of service. As shown in *Table 9–2* with the addition of project traffic, all study area street segments are calculated to continue to operate at LOS C or better.

TABLE 9-1
NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project			Existing + Project + Cumulative Projects		Impact Type
			Delay[a]	LOS[b]	Delay	LOS	Δ[d]	Delay	LOS	
1. E Heber Rd / SR 111	Signal	AM	19.8	B	20.0	C	0.2	20.9	C	None
		PM	35.6	D	36.9	D	1.3	45.4	D	None
2 E Heber Rd / Frontage Rd	TWSC[c]	AM	12.6	B	13.1	B	0.5	13.5	B	None
		PM	13.9	B	14.3	B	0.4	14.8	B	None
3 E Heber Rd / Project driveway	TWSC[c]	AM	10.7	B	–[e]	–[e]	–	–[e]	–[e]	–
		PM	11.9	B	–[e]	–[e]	–	–[e]	–[e]	–
4 E Heber Rd / Yourman Road	TWSC[c] / Signalized	AM	11.1	B	28.2	C	17.1	28.4	C	None
		PM	12.7	B	31.2	C	18.5	32.0	C	None
5 Frontage Rd / Jenco Productions driveway	TWSC[c]	AM	7.5	A	7.5	A	0.0	7.5	A	None
		PM	7.4	A	7.4	A	0.0	7.4	A	None

Footnotes:

a Average delay expressed in seconds per vehicle

b Level of Service

c TWSC: Two-Way Stop Controlled. Minor street delay is reported

d "Δ" denotes the project-induced increase in delay

e As part of the proposed expansion, the project driveway will be relocated eastward to the E Heber Road / Yourman Road intersection as the fourth leg (south leg), and close the current driveway for emergency access only

SIGNALIZED		UNSIGNALIZED	
DELAY/LOS THRESHOLDS		DELAY/LOS THRESHOLDS	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

TABLE 9–2
NEAR-TERM STREET SEGMENT OPERATIONS

Street Segment	Functional Classification	Capacity (LOS E)[a]	Existing			Existing + Project				Existing + Project + Cumulative Projects			Impact Type
			ADT[b]	LOS[c]	V/C[d]	ADT	LOS	V/C	Δ[e]	ADT	LOS	V/C	
E Heber Road													
West of SR 111	2-Lane Local Collector	16,200	5,560	C	0.343	5,560	C	0.343	0.000	5,900	C	0.364	None
SR 111 to Frontage Road	2-Lane Local Collector	16,200	5,650	C	0.349	5,818	C	0.359	0.010	6,168	C	0.381	None
Frontage Road to Yourman Road	2-Lane Local Collector	16,200	5,680	C	0.351	5,848	C	0.361	0.010	6,198	C	0.383	None
Frontage Road													None
North of E Heber Road	2-Lane Industrial Local Street	10,000	300	A	0.030	300	A	0.030	0.000	320	A	0.032	None
South of E Heber Road	2-Lane Industrial Local Street	10,000	1,330	A	0.133	1,330	A	0.133	0.000	1,420	A	0.142	None

Footnotes:

a Capacities based on County of Imperial Roadway Classification Table

b ADT - Average Daily Traffic Volumes

c LOS - Level of Service

d Volume to Capacity

e "Δ" denotes the project-induced increase in Volume to Capacity ratio

10.0 SITE ACCESS AND CIRCULATION REVIEW

Access to and from the facility is currently via one (1) driveway. This driveway is located approximately 800 feet east from the intersection of Heber Road and HWY 111. Once trucks have entered the facility site, they drive approximately 400 feet inside where they are met by an office. When given approval by staff, they are then allowed to drive further into the site and unload their freight.

A new entrance will be constructed and aligned with Yourman Road (East) to allow compatibility with Imperial County's planned extension of Yourman Road south of E Heber Road and signalization of the intersection. The new entrance will provide access to the current facility and to the proposed expansion area. The existing driveway to the facility will be converted to emergency access only. This proposed intersection traffic signal will allow for a safe and efficient flow of project traffic.

11.0 SIGNIFICANCE OF IMPACTS AND MITIGATION MEASURES

Per the County's significance thresholds and the analysis methodology presented in this report, no project related traffic is calculated to cause significant impacts within the study area in the Near-Term scenarios. The project adds traffic to the Heber Road / SR 111 intersection, which currently operates at LOS D. However, since the project adds less than 2 seconds of delay to the intersection, no significant impact is calculated. Therefore, mitigation measures are not required.