

- NEGATIVE DECLARATION**
 MITIGATED NEGATIVE DECLARATION

*Initial Study & Environmental Analysis
For:*

**(County Project Number 6421)
Lack Road Bridge Replacement Project**



Prepared By:

COUNTY OF IMPERIAL
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TABLE OF CONTENTS

	<u>PAGE</u>
<u>ACRONYMS AND ABBREVIATIONS</u>	4
 <u>SECTION 1</u>	
I. INTRODUCTION	7
 <u>SECTION 2</u>	
II. ENVIRONMENTAL CHECKLIST	12
PROJECT SUMMARY	22
ENVIRONMENTAL ANALYSIS	24
I. AESTHETICS.....	25
II. AGRICULTURE AND FOREST RESOURCES.....	26
III. AIR QUALITY.....	27
IV. BIOLOGICAL RESOURCES.....	30
V. CULTURAL RESOURCES.....	33
VI. ENERGY.....	34
VII. GEOLOGY AND SOILS.....	34
VIII. GREENHOUSE GAS EMISSION.....	36
IX. HAZARDS AND HAZARDOUS MATERIALS.....	38
X. HYDROLOGY AND WATER QUALITY.....	40
XI. LAND USE AND PLANNING.....	43
XII. MINERAL RESOURCES.....	43
XIII. NOISE.....	44
XIV. POPULATION AND HOUSING.....	47
XV. PUBLIC SERVICES.....	47
XVI. RECREATION.....	48
XVII. TRANSPORTATION.....	49
XVIII. TRIBAL CULTURAL RESOURCES.....	50
XIX. UTILITIES AND SERVICE SYSTEMS.....	51
XX. WILDFIRE.....	52
 <u>SECTION 3</u>	
III. MANDATORY FINDINGS OF SIGNIFICANCE	54
IV. PERSONS AND ORGANIZATIONS CONSULTED	56
V. REFERENCES	57
VI. NEGATIVE DECLARATION - COUNTY OF IMPERIAL	59
VII. FINDINGS	60
 <u>SECTION 4</u>	
VIII. RESPONSE TO COMMENTS (IF ANY)	61
IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)	62
 TABLES	
TABLE 1: COUNTY NOISE/LAND USE COMPATIBILITY GUIDELINES	44
TABLE 2: TYPICAL CONSTRUCTION ACTIVITY NOISE	45

EXHIBITS

EXHIBIT 1: REGIONAL VICINITY..... 14
EXHIBIT 2: PROJECT LOCATION..... 15
EXHIBIT 3: GENERAL PLAN AND LAND USE DESIGNATION MAP 16
EXHIBIT 4: ZONING MAP..... 17
EXHIBIT 5: SITE PLAN 18
EXHIBIT 6: TYPICAL SECTION 19
EXHIBIT 7: USGS TOPOGRAPHIC MAP..... 20

APPENDICES

- A. BIOLOGICAL ASSESSMENT REPORT, 2019**
- B. CULTURAL RESOURCES SURVEY REPORT, 2019 (UPDATED 2020)**
- C. DRAFT FOUNDATION REPORT, 2019**
- D. ASSEMBLY BILL (AB) 52 CONSULTATION & CAMPO BAND OF MISSION INDIANS COMMENT LETTER**
- E. APCD COMMENT LETTER**

ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
API	Area of Potential Impacts
AQMP	Air Quality Management Plan
BMP	Best Management Practice
BSA	Biological Study Area
BUOW	Burrowing Owl
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CFGC	California Fish and Game Code
CGP	Construction General Permit
CH ₄	Methane
CHRIS	California Historical Resources Information System
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CRRWQCB	Colorado River Regional Water Quality Control Board
dB	Decibel
dBA	A-Weighted Decibel
DPR	California Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EI	Environmental Intelligence, LLC
EIR	Environmental Impact Report
ESA	Environmentally Sensitive Area
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GPS	Global Positioning System
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbon
ICAPCD	Imperial County Air Pollution Control District
ICFD	Imperial County Fire Department
ICPDS	Imperial County Planning & Development Services Department

ICSO	Imperial County Sheriff's Office
IID	Imperial Irrigation District
IS	Initial Study
Leq	Equivalent Noise Level
LRA	Local Responsibility Area
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MPH	Miles per Hour
MSL	Mean Sea Level
N2O	Nitrous Oxide
NO2	Nitrogen Dioxide
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NF3	Nitrogen Trifluoride
NHD	National Hydrography Dataset
NPDES	National Pollutant Discharge Elimination System
NRHP	National Registrar of Historic Places
NWI	National Wetlands Inventory
O3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	California Governor's Office of Planning and Research
PFC	Perfluorocarbon
PM	Particulate Matter
PPV	Peak Particle Velocity
QI	Quaternary Lake Sediments
RACT SIP	Reasonable Available Control Technology State Implementation Plan
SCAG	Southern California Association of Governments
SCIC	South Coastal Information Center
SF6	Sulfur Hexafluoride
SIP	State Implementation Plan
SO2	Sulfur Dioxide
SR	State Route
SSAB	Salton Sea Air Basin
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zones

VMT
VOC

Vehicle Miles Traveled
Volatile Organic Compounds

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 Lack Road Bridge Replacement Project (Refer to Exhibit 1, *Regional Vicinity*, & 2, *Project Location*).

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

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

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

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

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

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

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

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

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

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

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

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

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

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

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

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

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

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

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

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

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. 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. (442) 265-1736.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the

relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

SECTION 2

II. *Environmental Checklist*

1. **Project Title:** Imperial County Public Works Department Lack Road Bridge Replacement Project
2. **Lead Agency:** Imperial County Planning & Development Services Department (ICPDS)
3. **Contact person and phone number:** Mariela Moran, Planner II, (442)265-1736, ext. 1747
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** marielamoran@co.imperial.ca.us
6. **Project location:** The proposed application, referred to herein as "the Proposed Project", is located approximately 5.8 miles northwest of the City of Westmorland where Lack Road crosses the New River at bridge No. 58C0101 in Imperial County, California (Exhibit 1, *Regional Vicinity*). The existing bridge is a seven (7) span, simply supported untreated DF stringers bridge with laminated timber decking and AC cover, supported by treated timber pile bents and pile bent abutments with timber seating walls that runs north and south over the New River. The existing bridge is approximately 106 feet in length and 27 feet wide. The approximate limits of the Proposed Project area would extend along Lack Road from approximately 300 feet south to 350 feet north of the New River. Lack Road is a north/south road that supports direct access from State Route (SR-) 86 to Imperial County Route S-30. The Proposed Project is located 0.3 mile south of Vail Road and 0.2 mile north of Foulds Road (Exhibit 2, *Project Location*).
7. **Project sponsor's name and address:** Imperial County Public Works Department, 155 S. 11th Street, El Centro, CA 92243
8. **General Plan designation:** The area surrounding the Proposed Project site is characterized as agricultural land uses. Lack Road is a farm to market road with two (2) traffic lanes, one (1) traveling in each direction. The Proposed Project is surrounded by land zoned as Heavy Agriculture (A-3) with a general plan designation of Agriculture (County of Imperial, 2019a, 2019b; Exhibits 3 and 4, *General Plan and Land Use Designation Map and Zoning Map*). The Proposed Project would construct a new improved bridge structure in place of the existing bridge where it crosses the New River. The Proposed Project is consistent with both the Imperial County General Plan's land use designation of the Proposed Project site and the County's Land Use Ordinance.
9. **Zoning:** See General Plan designation, above.
10. **Description of project:** Due to severe deterioration of some of the pile supports, the existing bridge has been closed to traffic (inactive) for over one (1) year. The County Public Works Department (Applicant) proposes to replace the existing seven (7) span timber bridge with a new precast concrete bridge designed to current American Association of State Highway and Transportation Officials (AASHTO) standards with California amendments (Exhibits 5 and 6, *Site Plan and Typical Section*). The proposed new bridge design would consist of a single-span bridge with four (4) precast/prestressed bulb-tee girders supported on two (2) abutments. The new bridge dimensions would be 35 feet and 6 inches wide by 125 feet long, with a structure depth of 7 feet and 0.875 inches. The selection of a precast bridge structure would eliminate the need for construction to take place within the New River.

The proposed roadway would remain a single travel lane in each direction, and geometry for the Proposed Project would be based on applicable County and AASHTO standards. The new bridge would be reconstructed in the same alignment with two (2) 12-foot-wide lanes designed for a 55 mile per hour (mph) vehicular speed. Shoulder widths would be 4 feet on the bridge, and would transition to the existing width at the roadway conform points. The new bridge would be designed to withstand a 100-year flood event.

The existing bridge would be removed without having to enter the New River as all construction activities were designed to take place from the river banks. It is estimated that the Proposed Project would be constructed over a nine (9)-month period beginning in March 2020 and concluding in November 2020.
11. **Surrounding land uses and setting:** Briefly describe the project's surroundings: The topography of the Proposed Project area is relatively flat with a gentle gradient downward to the northwest (Exhibit 7, *USGS Topographic Map*).

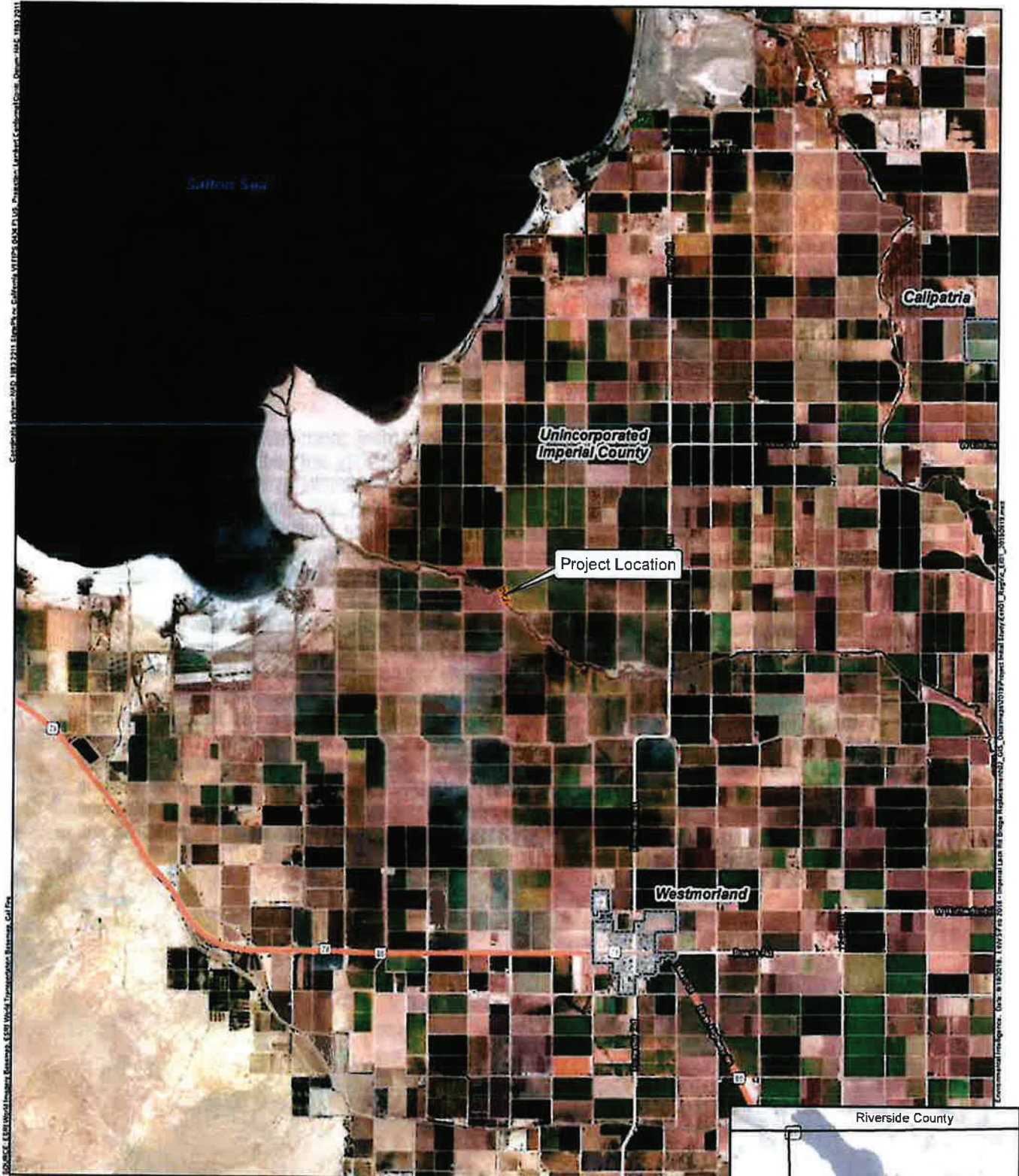
The elevation at the Proposed Project site is approximately 215 feet below Mean Sea Level (MSL). The New River flows beneath the existing bridge and the natural river's banks support limited wetland and riparian vegetation, which is primarily comprised of salt cedar (*Tamarix spp.*) and iodine bush (*Allenrolfea occidentalis*). Agricultural land surrounds the Proposed Project site with an Imperial Irrigation District (IID) culvert to the east that empties into the New River. Vail Road is located approximately 0.3 mile north of the Proposed Project site, while Foulds Road is located approximately 0.2 mile south of the Proposed Project site. The nearest sensitive receptors (residences) are approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project.




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

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

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

The lead CEQA agency must begin the Assembly Bill (AB) 52 consultation process prior to the release of a ND, MND, or EIR. The AB 52 consultation process shall begin with the Lead Agency (ICPDS) providing written notification to California Native American Tribes who identify as being traditionally and culturally affiliated with the Proposed Project area. The written notification includes a brief description of the Proposed Project, including the location, the Lead Agency's contact information, and notification that the California Native American Tribe has 30 days to request consultation, per AB 52. Upon receipt of a written response from a California Native American Tribe requesting consultation, the Lead Agency and the California Native American Tribe(s) requesting consultation shall begin AB 52 consultation. AB 52 consultation notification letter was sent by the ICPDS on December 10, 2019. Response comment letters were received from the Quechan Indian Tribe (via email) on December 13, 2019, December 23, 2019 and February 2, 2020. The comments provided by the Quechan Indian Tribe have been acknowledged by the ICPDS and the Cultural Resources Survey Report (see Appendix D).



-  Proposed Project Site
-  City Boundary
-  County Boundary

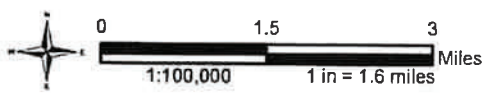
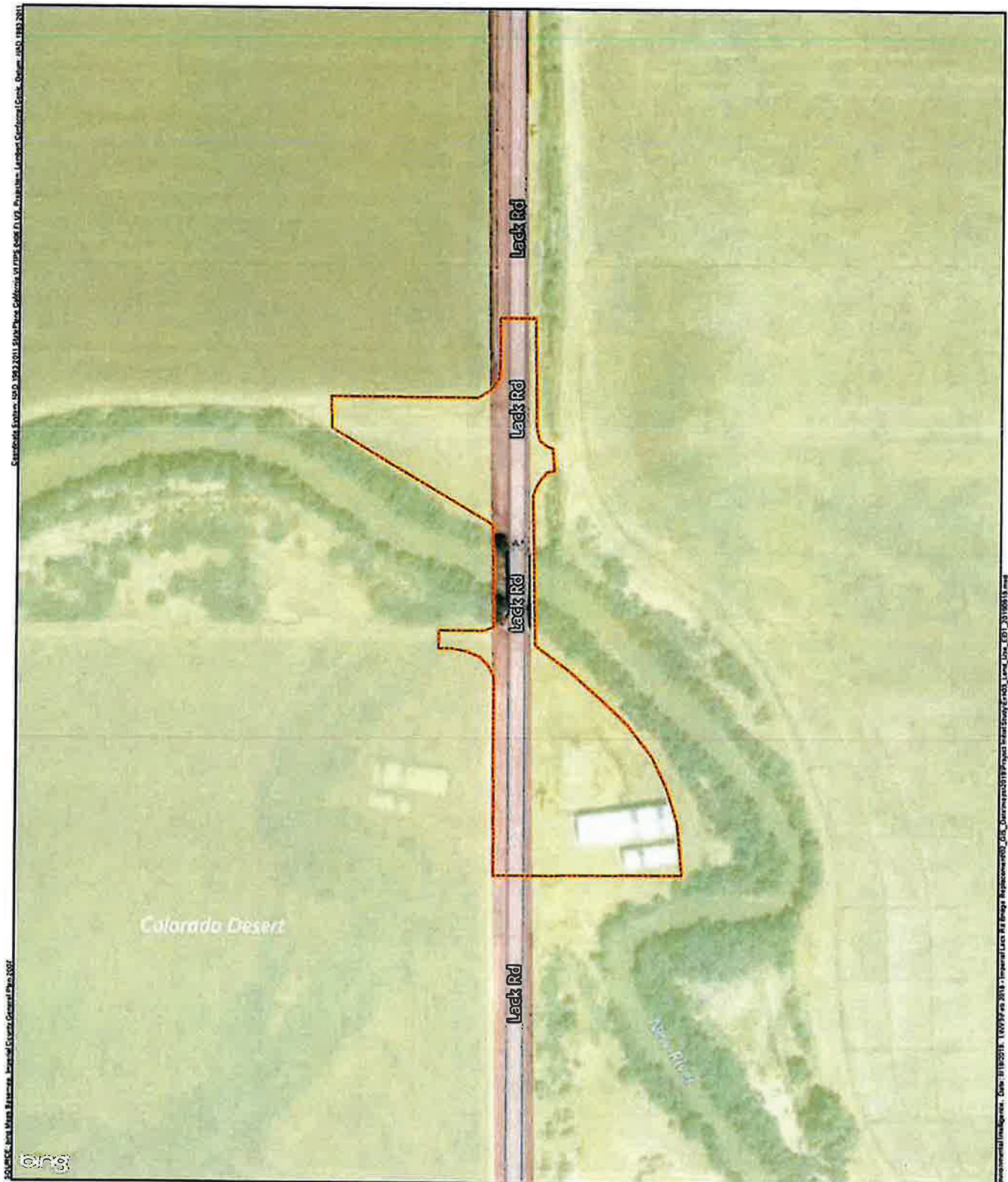


EXHIBIT 1: REGIONAL VICINITY
LACK ROAD BRIDGE REPLACEMENT | IMPERIAL COUNTY, CA

EEC ORIGINAL PKG



Proposed Project Site

Land Use
Agriculture

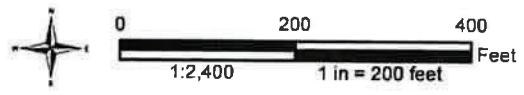
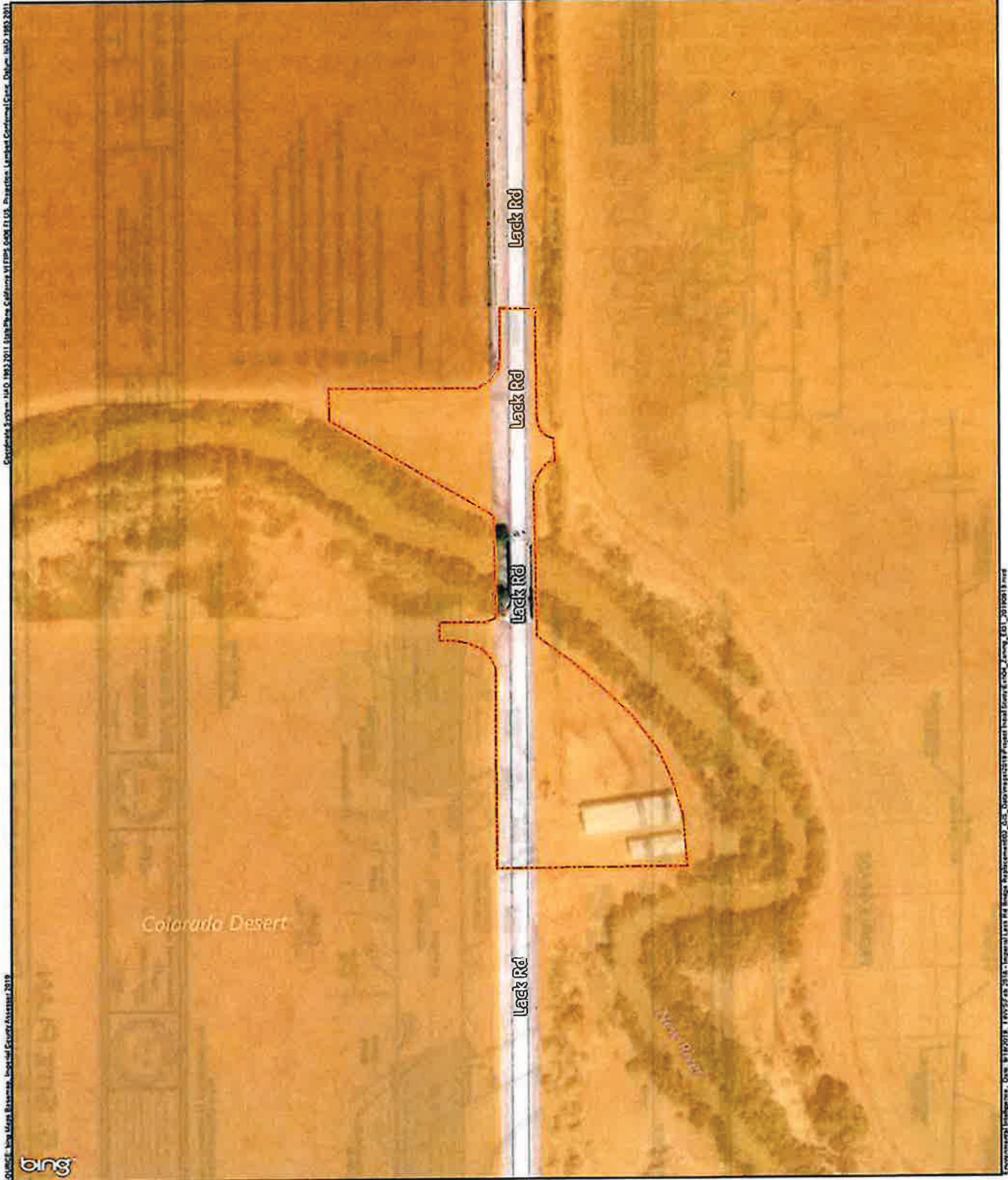


EXHIBIT 3: GENERAL PLAN AND LAND USE DESIGNATION MAP
LACK ROAD BRIDGE REPLACEMENT | IMPERIAL COUNTY, CA

EEC ORIGINAL PKG



 Proposed Project Site

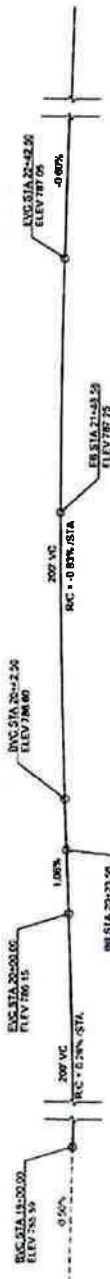
Zoning

 Heavy Agriculture

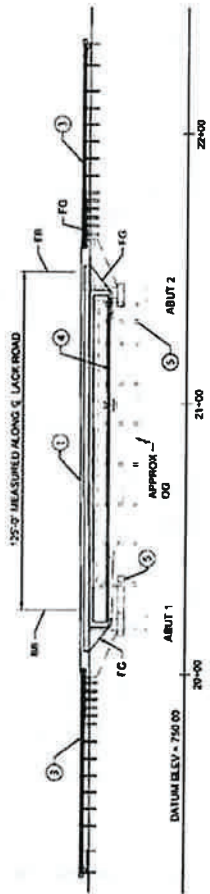


EXHIBIT 4: ZONING MAP
LACK ROAD BRIDGE REPLACEMENT | IMPERIAL COUNTY, CA

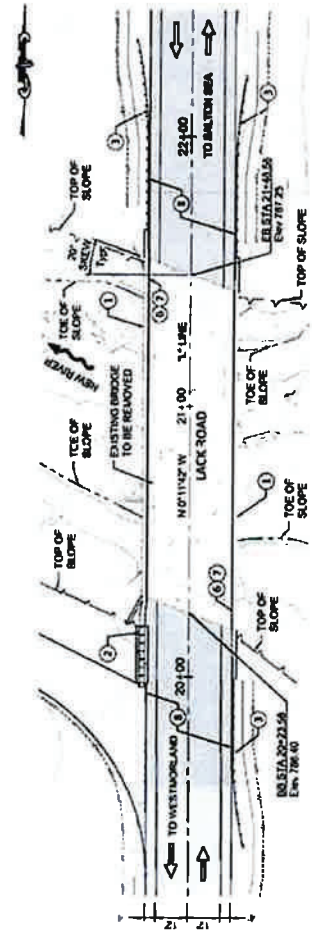
EEC ORIGINAL PKG



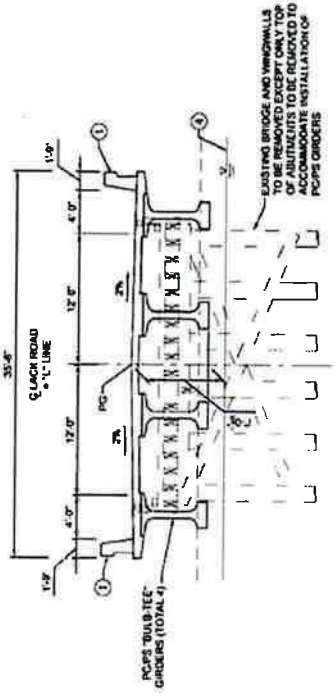
PROFILE GRADE
SCALE: 1"=20'



ELEVATION
SCALE: 1"=20'



PLAN
SCALE: 1"=20'



TYPICAL SECTION
SCALE: 1"=5'

- LEGEND:**
- ← INDICATES DIRECTION OF TRAFFIC
 - INDICATES EXISTING BRIDGE
 - INDICATES PROPOSED BRIDGE
 - INDICATES DIRECTION OF FLOW

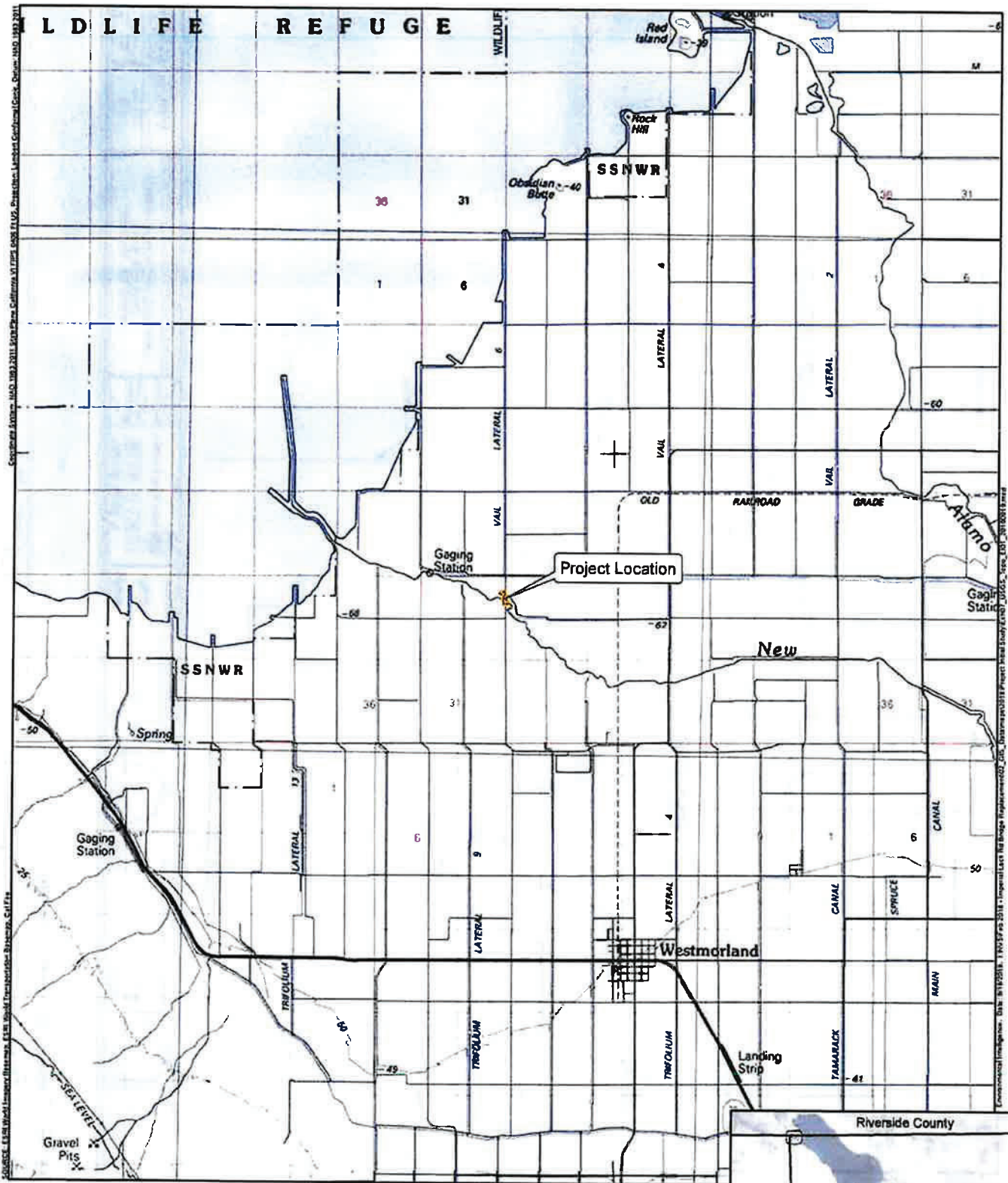
- NOTES:**
- 1 CONCRETE BARRIER (TYPE 80)
 - 2 CRASH CUSHION, SEE ROADWAY PLANS
 - 3 MIDWEST GUARDRAIL SYSTEM, SEE ROADWAY PLANS
 - 4 GROUND WATER SURFACE ELEVATION = 778.40
 - 5 EXISTING BRIDGE ABUTMENT REMAINS IN PLACE, CUT TOP PORTION TO AVOID NEW BRIDGE GIRDERS
 - 6 PAINT BRIDGE NAME "LACK ROAD BRIDGE"
 - 7 PAINT BRIDGE NUMBER "54C-0101"
 - 8 AC PAVEMENT OVER AGGREGATE BASE, SEE "PLAN AND PROFILE" SHEET

NOTES:
ANY UTILITIES LOCATED BY THE CONTRACTOR NOT SHOWN ON THESE PLANS SHALL BE PROTECTED IN PLACE OR REPLACED IN KIND IF DAMAGED BY THE CONTRACTOR



PREPARED UNDER THE DIRECT SUPERVISION OF DAVID S. GALT, P.E. DATE: 11/29/23	COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: DAVID S. GALT, P.E. DATE: 11/29/23	COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: DAVID S. GALT, P.E. DATE: 11/29/23	COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: DAVID S. GALT, P.E. DATE: 11/29/23	COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: DAVID S. GALT, P.E. DATE: 11/29/23	COUNTY OF IMPERIAL PUBLIC WORKS DEPARTMENT APPROVED FOR CONSTRUCTION BY: DAVID S. GALT, P.E. DATE: 11/29/23
GENERAL PLAN REFERENCE: S 01 SHEET NO. 5			LACK ROAD BRIDGE REPLACEMENT OVER NEW RIVER BRIDGE NO. 54C-0101		

EXHIBIT 5. SITE PLAN
LACK ROAD BRIDGE REPLACEMENT | IMPERIAL COUNTY, CA



 Proposed Project Site

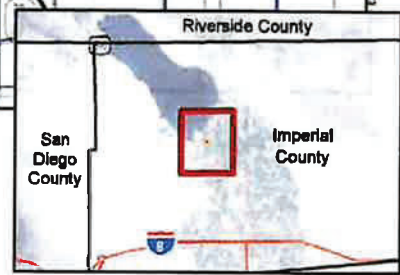


EXHIBIT 7: USGS TOPOGRAPHIC MAP
LACK ROAD BRIDGE REPLACEMENT | IMPERIAL COUNTY, CA

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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


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

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

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

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

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


 Jim Minnick, Director of Planning/EEC Chairman

3/2/20
 Date:

PROJECT SUMMARY

A. Project Location:

The Proposed Project is located approximately 5.8 miles northwest of the City of Westmorland where Lack Road crosses the New River at bridge No. 58C0101 in Imperial County, California (Exhibit 1, *Regional Vicinity*). The existing bridge is a seven (7) span, simply supported untreated DF stringers bridge with laminated timber decking and AC cover, supported by treated timber pile bents and pile bent abutments with timber seating walls that runs north and south over the New River. The existing bridge is approximately 106 feet in length and 27 feet wide. The approximate limits of the Proposed Project area would extend along Lack Road from approximately 300 feet south to 350 feet north of the New River. Lack Road is a north/south road that supports direct access from State Route (SR-) 86 to Imperial County Route S-30. The Proposed Project is located 0.3 mile south of Vail Road and 0.2 mile north of Foulds Road (Exhibit 2, *Project Location*).

B. Project Summary:

Due to severe deterioration of some of the pile supports, the existing bridge has been closed to traffic (inactive) for over one (1) year. The County Public Works Department (Applicant) proposes to replace the existing seven (7) span timber bridge with a new precast concrete bridge designed to current American Association of State Highway and Transportation Officials (AASHTO) standards with California amendments (Exhibits 5 and 6, *Site Plan and Typical Section*). The proposed new bridge design would consist of a single-span bridge with four (4) precast/prestressed bulb-tee girders supported on two (2) abutments. The new bridge dimensions would be 35 feet and 6 inches wide by 125 feet long, with a structure depth of 7 feet and 0.875 inches. The selection of a precast bridge structure would eliminate the need for construction to take place within the New River.

The proposed roadway would remain a single travel lane in each direction, and geometry for the Proposed Project would be based on applicable County and AASHTO standards. The new bridge would be reconstructed in the same alignment with two (2) 12-foot-wide lanes designed for a 55 mile per hour (mph) vehicular speed. Shoulder widths would be 4 feet on the bridge, and would transition to the existing width at the roadway conform points. The new bridge would be designed to withstand a 100-year flood event.

The existing bridge would be removed without having to enter the New River as all construction activities were designed to take place from the river banks. It is estimated that the Proposed Project would be constructed over a nine (9)-month period beginning in March 2020 and concluding in November 2020.

C. Environmental Setting:

The topography of the Proposed Project area is relatively flat with a gentle gradient downward to the northwest (Exhibit 7, *USGS Topographic Map*). The elevation at the Proposed Project site is approximately 215 feet below Mean Sea Level (MSL). The New River flows beneath the existing bridge and the natural river's banks support limited wetland and riparian vegetation, which is primarily comprised of salt cedar (*Tamarix spp.*) and iodine bush (*Allenrolfea occidentalis*). Agricultural land surrounds the Proposed Project site with an Imperial Irrigation District (IID) culvert to the east that empties into the New River. Vail Road is located approximately 0.3 mile north of the Proposed Project site, while Foulds Road is located approximately 0.2 mile south of the Proposed Project site. The nearest sensitive receptors (residences) are approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project.

D. Analysis:

The area surrounding the Proposed Project site is characterized as agricultural land uses. Lack Road is a farm to market road with two (2) traffic lanes, one (1) traveling in each direction. The Proposed Project is surrounded by land zoned as Heavy Agriculture (A-3) with a general plan designation of Agriculture (County of Imperial, 2019a, 2019b; Exhibits 3 and 4, *General Plan and Land Use Designation Map and Zoning Map*). The Proposed Project would construct a new improved bridge structure in place of the existing bridge where it crosses the New River. The Proposed Project is consistent with both the Imperial County General Plan's land use designation of the Proposed Project site and the County's Land Use Ordinance. Therefore, the adoption of the CEQA Initial Study for the Proposed Project would be consistent with applicable County and State ordinances and regulations.

E. General Plan Consistency:

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

The Proposed Project consists of the replacement of the existing seven (7-) span timber bridge with a new precast concrete bridge within the same alignment as the existing bridge. The topography on the site is flat and primarily surrounded by disturbed agricultural land. The Proposed Project site is surrounded by land designated as Agriculture and zoned as A-3. The County's Zoning Code (Title 9, Chapter 9: A-3 [Heavy Agriculture]) provides the following description for the Heavy Agriculture land use district, and is provided below:

The purpose of the A-3 (Heavy Agriculture) [40 acres or larger typical] Zone is to designate areas that are suitable for agricultural land uses; to prevent the encroachment of incompatible uses onto and within agricultural lands; and to prohibit the premature conversion of such lands to non-agricultural uses. It is a land use that is to promote the heaviest of agricultural uses in the most suitable land areas of the County. Uses in the A-3 zoning designation are limited primarily to agricultural related uses and agricultural activities that are compatible with agricultural uses.

The predominant land use in the vicinity of the Proposed Project is agricultural.

Four (4) highways within the County have the potential to be designated as a State Scenic Highway. The nearest eligible State Scenic Highway is SR-78 located approximately 4.3 miles south of the Proposed Project site (California Department of Transportation [Caltrans], 2018; County General Plan Circulation and Scenic Highways Element, 2008).

One of the goals of the County's General Plan is to protect and enhance the aesthetic character of the region. The County's natural scenic resources include deserts, sand dunes, mountains, and the Salton Sea. The nearest natural scenic resource is the Salton Sea, located approximately 2.2 miles northwest of the Proposed Project site.

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

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

a) The Proposed Project would not interfere with or contain components that would adversely impact a scenic vista, area, or scenic corridor. The Proposed Project would be located on a site which does not contain any unique scenic qualities or characteristics. The Proposed Project would not adversely affect any scenic vista, spaces, corridors, or areas because the Proposed Project is consistent with the surrounding land uses and would not be visible from scenic vistas or major scenic corridors such as SR-78 (County General Plan Conservation and Open Space Element, 2016). Given the new bridge's depth of 7 feet and 0.875 inches, views of important visual resources such as views of the Salton Sea to the northwest will remain unaffected by the Proposed Project. Therefore, the Proposed Project would not be expected to have a substantial adverse effect on a scenic vista and there would be no impacts.
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

b) The Proposed Project is not located along a State Scenic Highway and there are no scenic trees, rock outcroppings, or historic buildings located at the Proposed Project site or in the surrounding area that would be damaged or impacted as a result of the Proposed Project. Therefore, no impact would occur as a result of the Proposed Project.
- 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 site is relatively flat and the proposed bridge replacement would occur within the existing roadway. The new bridge and construction related activities would be visible from public roadways and the surrounding agricultural lands. While the Proposed Project would minimally change the visual character in a non-urbanized area, the Proposed Project would replace an existing bridge that is so severely deteriorated that it resulted in inactivity (bridge closure) for over a year. Therefore, viewer sensitivity to the visual changes resulting from the new bridge would be minimal and instead contribute to a visual improvement of public views along the public roadways once the new bridge has been completed. As such, the Proposed Project would not significantly alter the existing viewshed and impacts would be less than significant.
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

d) The existing sources of light and glare in the Proposed Project area consist of vehicle lights (headlights and taillights) on the existing roadways and lighting associated with the surrounding agricultural uses. As a bridge replacement project, the Proposed Project's new bridge would not directly add any new light sources. As the existing bridge has been closed for over a year due to severe deterioration, the Proposed Project would generate additional traffic along Lack Road upon operation

of the new bridge, which would increase light and glare from additional vehicular lights and indirectly add new light sources. However, the nearest residences are located 1.1 miles south and 1.9 miles northeast of the Proposed Project site. Due to these distances, these residences would not be adversely or significantly affected by the increase in light and glare from additional vehicular lights from the new bridge. Therefore, potential lighting and glare impacts would be less than significant.

Cumulative Impacts:

Implementation of the Proposed Project would not result in any significant cumulative impacts because development of the Proposed Project will not affect any scenic vista, spaces, corridors, or areas and is consistent with the surrounding land uses. Furthermore, the Proposed Project has been designed in accordance with applicable County and current AASHTO standards in order to not adversely impact day or nighttime views in the surrounding area. Therefore, the Proposed Project's cumulative contribution would be less than significant and potential cumulative impacts to aesthetics would not occur.

ii. AGRICULTURE AND FOREST RESOURCES

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| <p>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?</p> <p>a) The California Department of Conservation's Important Farmland Maps were reviewed and the Proposed Project is located on land that is designated as Farmland of Statewide Importance. Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture (California Department of Conservation, 2016a). Though the Proposed Project is located on land designated as Farmland of Statewide Importance, the Proposed Project consists of the replacement of an existing bridge with a new and improved bridge structure over the New River. The new bridge would be reconstructed in the same alignment as the existing bridge. As such, the Proposed Project would not require or result in any conversions or changes of farmland to non-agricultural uses as the existing use is a non-agricultural use. Therefore, less than significant impacts would occur.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?</p> <p>b) As discussed above, while the Proposed Project is surrounded by land designated as Agriculture and zoned A-3 (Heavy Agriculture), the Proposed Project is within the County's Right-of-Way and consists of the replacement of an existing bridge with a new and improved bridge structure to be reconstructed in the same alignment as the existing bridge over the New River. The County exited the California Department of Conservation's Land Conservation Act (Williamson Act) program by nonrenewing all contracts within the County, therefore no portion of the Proposed Project is enrolled in a Williamson Act Contract (California Department of Conservation, 2016b). As such, no impacts would occur related to conflicts with the existing zoning or a Williamson Act contract.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>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))?</p> <p>c) The Proposed Project would not be located on or within the vicinity of land zoned as forest land. The Proposed Project site is surrounded by land zoned as A-3 (Heavy Agriculture). The Proposed Project consists of the replacement of an existing bridge with a new and improved bridge structure reconstructed in the same alignment as the existing bridge over the New River. Therefore, the Proposed Project would not 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)). Therefore, no impacts would occur.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p> <p>d) The Proposed Project would not be located on or within the vicinity of forest land (as defined in California Public Resources Code Section 12220 (g)) and therefore, would not result in the loss of forest land or the conversion of forest land</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

to non-forest use. No impact 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) The Proposed Project site is not located on or within the vicinity of forest land (California Public Resources Coded Section 12220 [g]) and, therefore, would not result in the conversion of forest land to non-forest use. The Proposed Project is surrounded by land designated as Agriculture and zoned A-3 (Heavy Agriculture). However, the Proposed Project would involve the replacement of an existing bridge with a new and improved bridge structure within the same alignment as the existing bridge. Therefore, the Proposed Project would not require or result in the conversion of Farmland to non-agricultural use (County of Imperial, 2019a, 2019b; California Department of Conservation, 2016a). Therefore, less than significant impacts would occur.

Cumulative Impacts:

Implementation of the Proposed Project would not result in any loss to agriculture and forestry resources; therefore, no cumulative impacts would occur.

III. AIR QUALITY

The Proposed Project is located in the Salton Sea Air Basin (SSAB) within the Imperial County Air Pollution Control District's (ICAPCD's) jurisdictional boundaries. The SSAB includes the Imperial Valley and the central part of Riverside County, including the Coachella Valley. The Imperial Valley is bordered by the Salton Sea to the north, the Anza-Borrego Desert State Park to the west, the Chocolate Mountains to the northeast, and the U.S./Mexican Border to the south. ICAPCD has jurisdiction over stationary sources of pollution and regulates air pollution for the Basin. Non-stationary sources are regulated by the California Air Resources Board (CARB). The ICAPCD has regional authority over the control of air pollution from all sources other than emissions from motor vehicles as well as regulatory control over all stationary sources of air contaminants. The ICAPCD has established significance thresholds to assist lead agencies in determining whether a proposed project may have a significant air quality impact and has provided guidance for project applicants in the 2007 Imperial County CEQA Air Quality Handbook (APCD, 2017).

Criteria Pollutants

Six (6) air pollutants have been identified by the U.S. Environmental Protection Agency (USEPA) and the CARB as being of concern both on a nationwide and statewide level: ozone (O₃); carbon monoxide (CO); nitrogen dioxide (NO₂); sulfur dioxide (SO₂); lead; and particulate matter (PM), which is subdivided into two (2) classes based on particle size: PM equal to or less than 10 micrometers in diameter (PM₁₀) and PM equal to or less than 2.5 micrometers in diameter (PM_{2.5}).

Air pollutant emissions also contribute to poor air quality when those emissions exceed significance thresholds, which can have adverse effects on human health. For instance, exposure to high concentrations of volatile organic compounds (VOCs) can interfere with oxygen uptake and ambient VOC concentrations are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis. NO₂, as a potential irritant at atmospheric concentrations, can worsen respiratory diseases, such as asthma, over short periods of exposure, which causes respiratory symptoms including coughing, wheezing, or difficulty breathing. Longer periods of exposure to high concentrations of NO₂ can contribute to the development of asthma and potentially increase susceptibility to respiratory infections. CO in high concentrations reduces the amount of oxygen transported in the blood stream to critical organs like the heart and brain and, at very high levels, can lead to dizziness, confusion, unconsciousness, and death (USEPA, 2016). SO₂ can result in temporary breathing impairment in asthmatic children and adults engaged in active outdoor activities. Lastly, when inhaled into the deepest part of the lung, both PM₁₀ and PM_{2.5} cause health effects and, according to numerous scientific studies, have been linked to premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing (USEPA, 2018). These pollutants can cause potentially adverse health effects when they are emitted in significant amounts.

With the exception of PM_{2.5}, PM₁₀, and 8-hour O₃, the SSAB is in attainment or unclassified for all federal and State air pollutant standards. On November 13, 2009, the County was designated in nonattainment for 2006 24-hour PM_{2.5} National Ambient Air Quality Standards (NAAQS). However, the nonattainment designation was only for the urban area of the County. On April 10, 2014, the CARB approved the 2013 Amendments to Area Designations for California Ambient Air Quality Standards (CAAQS). Effective July 1, 2014, the City of Calexico was designated in nonattainment for State PM_{2.5} standard, with the rest of the SSAB designated as in attainment.

The Imperial Valley is classified as nonattainment for federal and State PM₁₀ standards. As a result, ICAPCD was required to develop a PM₁₀ Attainment Plan. The final 2009 Imperial County State Implementation Plan (SIP) for PM₁₀ was adopted by the ICAPCD on August 11, 2009.

ICAPCD was required to develop an 8-hour attainment plan for Ozone due to the County's moderate nonattainment status for 1997 federal 8-hour O₃ standards. On December 3, 2009 the USEPA determined the County had attained the 1997 8-hour NAAQS for O₃. However, because this determination does not constitute a redesignation to attainment under Section 107(d)(3) of the Clean Air Act (CAA), the designation status has remained moderate nonattainment for the 1997 8-hour O₃ standard. Nevertheless, ICAPCD is required

to submit a modified air quality management plan (AQMP) to the USEPA for approval. Therefore, in order to meet the CAA requirements, the County submitted a 2009 8-hour O₃ AQMP and the Reasonable Available Control Technology State Implementation Plan (RACT SIP) for USEPA approval. Both the modified 2009 8-hour O₃ AQMP and RACT SIP were adopted by the ICAPCD on July 13, 2010. On November 18, 2010, the CARB approved the County's modified 2009 8-hour O₃ AQMP.

Regional Conditions

Mountain peaks in the SSAB range from 3,000 to 11,000 feet in elevation, which prevents off-shore winds from flowing into Imperial County. Temperatures in the SSAB frequently exceed 100 degrees Fahrenheit (°F) during the summer and are generally over 70 °F in the winter. The SSAB averages between 3 and 7 inches of precipitation per year (CARB, 2011).

Sensitive Receptors

CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes and people with cardiovascular and chronic respiratory diseases. Examples of land uses where substantial numbers of sensitive receptors are often found are residences, schools, daycare centers, playgrounds, and medical-related facilities (CARB, 2005). There are a few scattered residences on the surrounding agricultural land in the general vicinity of the Proposed Project. The nearest sensitive receptors to the Proposed Project are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project. The closest school, Westmorland Elementary School is located approximately 4.7 miles southeast of the Proposed Project site (Google Earth, accessed 2019). It is estimated that the Proposed Project would be constructed over an approximate nine (9)-month period.

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) As previously discussed, the SSAB has been designated as in attainment or unclassified for all federal and State pollutant standards with the exception of PM_{2.5}, PM₁₀, and 8-hour O₃. The 2009 Imperial County SIP for PM₁₀, modified 2009 8-hour O₃ AQMP, and RACT SIP set programs to comply with State and federal requirements for air quality standards. Air quality plans are based on population growth and vehicular miles traveled based on land uses established by local general plans. Therefore, the Proposed Project must demonstrate compliance with local land use plans, population projections, and applicable ICAPCD rules and regulations. The Proposed Project site is surrounded by land designated as Agriculture and zoned as A-3 (Heavy Agriculture). While the Proposed Project is surrounded by these lands, the Proposed Project consists of the replacement of an existing deteriorated bridge with a new and improved bridge structure to be reconstructed in the same alignment as the existing bridge over the New River. The Proposed Project would not alter the existing use of the Proposed Project site and, as such, be consistent with all applicable land use plans. Additionally, the Proposed Project does not include a residential component. As such, the Proposed Project would not alter the location, distribution, density, or growth of the human population in the area and would not exceed population projections.

Regarding short-term sources of emissions, the Proposed Project would generate fugitive dust emissions during ground disturbing activities during the construction phase. During operations, the Proposed Project's new bridge would add mobile emission sources (heavy equipment and vehicle traffic) to the Proposed Project vicinity that are currently emitted on other local roads on lengthy detours as the existing bridge has been closed for over a year. The Proposed Project would be required to comply with existing ICAPCD rules for the reduction of fugitive dust emissions. ICAPCD's Regulation VIII establishes these procedures. Compliance with this regulation is mandatory on all construction sites, regardless of size. However, because compliance with Regulation VIII is required for all projects, compliance with this regulation is mandatory and included as mitigation measures in this document. Therefore, compliance with this regulation and the ICAPCD's CEQA Handbook (MM-AQ-1 and MM-AQ-2) would ensure the Proposed Project would not conflict with or obstruct implementation of applicable air quality plans. Therefore, the Proposed Project would result in less than significant impacts with mitigation incorporated.

MM-AQ-1:

The Applicant shall comply with the requirements contained within ICAPCD Regulation VIII, which includes preparation of a Dust Control Plan for control of fugitive dust during construction, written notification to the Air District 10 days prior to the start of construction activities; and remit a list of equipment to be used during construction in Excel format (See Appendix E). The Dust Control Plan shall address construction and earthmoving activities. The Dust Control Plan shall include information regarding the dust suppressants that shall be applied and specific surface treatments and/or control measures to be utilized during construction. The Dust Control Plan shall be submitted to ICAPCD and ICPDS for review and approval prior to construction.

MM-AQ-2:

The Applicant shall comply with the required standard and enhanced mitigation measures contained in the ICAPCD CEQA Handbook, which include the following:

- Standard Mitigation Measures for Construction Combustion Equipment
 - Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment;

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum;
- Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use; and
- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
- **Enhanced Mitigation Measures for Construction Equipment**
 - Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways; and
 - Implement activity management (e.g. rescheduling activities to reduce short-term impacts).

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) The Proposed Project's impacts during both construction and operation could be cumulatively considerable as the SSAB is in attainment or unclassified for all federal and State pollutant standards with the exception of PM_{2.5}, PM₁₀, and 8-hour O₃. However, an individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. While the Proposed Project would generate emissions during the construction of the new bridge and could potentially result in a cumulatively considerable increase in the generation of pollutants, the Proposed Project would replace the existing bridge with a new and improved bridge structure within the same alignment as the existing bridge. Therefore, due to the small project footprint, construction impacts are expected to be minimal and temporary. Additionally, the Proposed Project would be required to comply with Regulation VII and the ICAPCD's CEQA Handbook (MM-AQ-1 and MM-AQ-2). As such, implementation of mitigation measures would ensure the Proposed Project's cumulative contribution during construction would be less than significant.

Emissions during operation of the Proposed Project could potentially result in a cumulatively considerable increase due to an increase in vehicular traffic (since the bridge is currently closed and seeing none). As commuters that currently utilize this stretch of Lack Road are required to exercise lengthy detours due to the closure of the existing bridge, the Proposed Project would improve passage for commuters. However, the Proposed Project's new bridge would increase mobile emission sources (heavy equipment and vehicle traffic) to the Proposed Project vicinity that have not been in the vicinity since the closure of the existing bridge over a year ago. Because the new bridge would be located on Lack Road, a Minor Collector road classified by the County, and only containing two (2) travel lanes, it is anticipated the new bridge would be used by the surrounding community's marginal number of commuters that either live or work along that stretch of Lack Road. As such, it is expected that the mobile emissions generated by the Proposed Project would not result in emissions that would exceed the ICAPCD's significance thresholds. Additionally, as the nearest sensitive receptors to the Proposed Project are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project, the Proposed Project's emissions would not exceed the ICAPCD's significance thresholds at these sensitive receptors. Furthermore, like with the Proposed Project and as discussed in Response IIIa, above, cumulative projects would also be subject to mitigation pursuant to the ICAPCD rules and regulations (e.g., Regulation VIII) and the ICAPCD's CEQA Handbook. As the Proposed Project would be required to comply with Regulation VIII and the ICAPCD's CEQA Handbook (MM-AQ-1 and MM-AQ-2), the Proposed Project's contribution would be less than cumulatively considerable.

c) Expose sensitive receptors to substantial pollutant concentrations?

c) In addition to the above listed criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are less pervasive in the urban atmosphere than criteria air pollutants, however they are linked to short-term (acute) and/or long-term (chronic or carcinogenic) adverse human health effects. There are hundreds of different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust, to name a few. Cars and trucks release at least 40 different TACs. The most important of these TACs, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to TACs can result from emissions from normal operations as well as accidental releases. Health effects of TACs can include cancer, birth defects, neurological damage, and death. The Office of Environmental Health Hazard Assessment (OEHHA) developed a Guidance Manual for the Preparation of Health Risk Assessments. According to OEHHA methodology, health effects from carcinogenic TACs are usually described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs.

Construction

The greatest potential for TAC emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the Proposed Project. As discussed above, health effects from TACs are usually described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs. Health effects are generally evaluated based on a lifetime, long-term exposure (i.e., 70 years). Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the Proposed Project would not result in a long-term

substantial source of TAC emissions and corresponding individual cancer risk. Additionally, the nearest sensitive receptors are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project site. Therefore, less than significant short-term toxic air contaminant impacts to sensitive receptors would occur during the construction phase of the Proposed Project.

Operation

The existing bridge has been closed to traffic for over one (1) year due to severe deterioration of some of the pile supports. As such, no existing traffic is generated at the Proposed Project site. Because agricultural operations surround the Proposed Project site, the Proposed Project would introduce heavy equipment and vehicular traffic along the new bridge and this section of Lack Road to the site during operation. While the Proposed Project's new bridge would generate heavy equipment and vehicular traffic, because the new bridge would be located on Lack Road, which is classified as a Minor Collector road by the County, and only contain two (2) travel lanes, it is anticipated the new bridge would be used by the surrounding community's marginal number of commuters that either live or work along that stretch of Lack Road. As such, it is anticipated the Proposed Project would not emit substantial pollutant concentrations. Additionally, as discussed in Response IIIa, above, the Applicant would comply with fugitive dust control measures during operation pursuant to ICAPCD's Regulation VIII (MM-AQ-1) and the ICAPCD CEQA Handbook (MM-AQ-2). Due to these factors and the distance to the nearest sensitive receptors (residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project site), impacts to sensitive receptors during operation would be less than significant with mitigation incorporated.

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

d) A significant impact would result if the Proposed Project would create objectionable odors during construction or operational activity. Potential sources that may emanate objectionable odors during construction activities include equipment exhaust, application of asphalt paints, and other exterior finishes. The objectionable odors that may be produced during the construction process are of short-term nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Land uses, and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Proposed Project, which consists of the replacement of an existing deteriorated bridge with a new bridge within the same alignment, would not include components that are typically associated with odor complaints. Additionally, the nearest sensitive receptors are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project site. Due to the limited amounts of odor producing materials being utilized and the Proposed Project's distance from the nearest sensitive receptors, less than significant impacts related to odors affecting a substantial number of people would occur.

Cumulative Impacts:

Proposed Project implementation is not anticipated to exceed the construction or operational emissions threshold adopted by the ICAPCD. Compliance with the applicable ICAPCD's rules and regulations (including implementation of MM-AQ-1 and MM-AQ-2) would ensure that dust emissions are minimized during construction to further reduce short-term cumulative impacts. There is an existing regional cumulative impact associated with PM_{2.5}, PM₁₀, and 8-hour O₃ because the SSAB is in attainment or unclassified for all federal and State pollutant standards with the exception of these pollutants. However, an individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. Because emissions from the Proposed Project are expected to be less than significant, the Proposed Project's contribution to the cumulative air quality impact would also be less than significant. As discussed in Response IIIb, above, cumulative projects would also be subject to mitigation pursuant to the ICAPCD rules and regulations (e.g., Regulation VIII) and the ICAPCD's CEQA Handbook. Therefore, cumulative impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

The County Public Works Department contracted Ms. Marie Barrett of Barrett's Biological Surveys to conduct a habitat assessment of the Proposed Project site. Prior to conducting the field survey, a desktop analysis was conducted. The desktop analysis included a literature review of potentially applicable regulatory requirements. Additionally, publicly available data was reviewed to determine if any special-status species or habitats occur (via recorded occurrences or habitat) or have the potential to occur within the vicinity of the Project. Resource records were obtained using the California Natural Diversity Database (CNDDB) for the Westmoreland E U.S. Geological Survey (USGS) 7.5-minute Topographic Quadrangle and the surrounding eight (8) quadrangles within the United States including Wiest, Iris, Niland, Obsidian Butte, Westmoreland W, Brawley NW, Brawley, and Alamorio. Ms. Barrett and Mr. Jacob Calanno conducted a pedestrian survey within and adjacent to the Biological Study Area (BSA) on July 25, 2019. The BSA is located within the Colorado Desert, which is a subdivision of the larger Sonoran Desert and covers approximately 7 million acres. The desert encompasses the County and includes parts of San Diego County, Riverside County, and a small part of San Bernardino County. The region experiences greater summer daytime temperatures (up to 120°F) than higher-elevation deserts and rarely experiences frost. In addition, the Colorado Desert experiences two (2) rainy seasons per year, usually in the winter and late summer in this portion. This area is within the agricultural portion that is irrigated by Colorado River water delivered through water conveyance structures maintained by the IID. The Proposed Project spans the New River which drains into the Salton Sea.

The purpose of the field survey was to identify if any sensitive or otherwise protected biological resources occur or have the potential to occur within the Proposed Project boundary and surrounding area. As discussed above, a desktop analysis and summary report were prepared by Barrett's Biological Surveys following the survey and are included as Appendix A (*Biological Assessment Report, 2019*). Discussions and determinations within this section are based on the results presented in Appendix A.

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) No federally or State threatened, endangered, candidate, or special-status species, or sensitive natural habitats were observed within the BSA. Within the nine (9) quadrangles searched as part of the desktop analysis for the Biological Assessment Report, four (4) botanical species and 36 wildlife species were listed. None of the special-status plant species were observed during the survey or would be expected to occur within the Proposed Project site. Nevertheless, the Biological Assessment Report recommended a preconstruction plant survey should be conducted by a qualified biologist (MM-BIO-1). Of the special-status wildlife species, burrowing owl (*Athene cunicularia*), a California Department of Fish and Wildlife (CDFW) Species of Special Concern and Yuma Ridgway's Rail (*Rallus obsoletus*), a federally endangered species, are both known to occur in the vicinity of the Proposed Project site (Appendix A). However, the Proposed Project's BSA did not have any sign of either species. There were no burrows located within the BSA. Additionally, no nesting birds or bats were observed during the pedestrian survey. Potential removal of salt cedar (*Tamarix spp.*), an invasive species, and iodine bush (*Allenrolfea occidentalis*), a native species, may be determined necessary to facilitate construction activities in the work area. This vegetation provides potentially suitable habitat for nesting birds. Therefore, it is recommended that vegetation removal occur outside the nesting season (general breeding and nesting bird season of February through August; MM-BIO-2). With implementation of MM-BIO-1 through MM-BIO-4, the Proposed Project's impacts to nesting birds during construction would be less than significant.

MM-BIO-1:

A preconstruction plant survey shall be conducted by a qualified biologist.

MM-BIO-2:

Nesting bird surveys by qualified biologists during nesting season (February through August); preferably time construction during non-nesting season (September through January). Time nesting surveys within 3-5 days prior to start of construction. Burrowing owl (BUOW) preconstruction survey within 14 days of start of construction.

MM-BIO-3:

Worker environmental awareness training for nesting birds and BUOW, which shall include the following aspects:

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

MM-BIO-4:

Areas outside of the Proposed Project footprint shall be designated as an "Environmentally Sensitive Area" (ESA) on Proposed Project plans. No project-related activities shall take place within the ESA-designated areas.

- 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) Salt cedar and iodine bush were observed within the BSA during the pedestrian survey. No sensitive vegetation communities occur within or adjacent to the Proposed Project site (Appendix A). Effects on any riparian habitat would be expected to have a less than significant impact from implementation of the Proposed Project.

- c) Have a substantial adverse effect on state or federally

protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

c) It is understood that Ms. Barrett did not conduct formal jurisdictional delineation surveys. However, riverine and freshwater emergent wetlands were found in the Proposed Project site (U.S. Fish and Wildlife Service [USFWS] National Wetlands Inventory [NWI], 2019), as the New River is recognized as a jurisdictional water body by U.S. Army Corps of Engineers (USACE), Colorado River Regional Water Quality Control Board (CRRWQCB) and CDFW. Federal and State guidelines both follow a no net loss of wetlands. Therefore, the Proposed Project may require a Nationwide 404 permit from USACE under the Clean Water Act, a Streambed Alteration Agreement from CDFW under Section 1602 of the California Fish and Game Code (CFG), and a 401 Water Quality Certification from CRRWQCB. However, the existing bridge would be removed without the need to be in the New River and all construction activities are anticipated to take place from the banks. Thus, construction of the Proposed Project would not impact any wetlands associated with the New River, the flow of the New River, or allow any fill into or out of the New River. The Proposed Project would have a temporary impact to the project area during construction; however, no permanent impacts are anticipated as a result of construction activities. Nevertheless, the Biological Report recommended consultation with USACE to obtain the required permit for working within a waterway that drains into waters of the United States and CDFW regarding a Streambed Alteration Agreement. Therefore, consultation with USACE, CDFW, and CRRWQCB is recommended for the Proposed Project to ensure the Proposed Project obtains applicable permits and complies with any mitigation measures from these agencies (MM-BIO-5). Implementation of mitigation measure MM-BIO-5 would reduce impacts to less than significant levels.

MM-BIO-5:

Once consultation with USACE, CRRWQCB, and CDFW has been conducted, the Applicant shall apply for and obtain any necessary permits and comply with any mitigation measures required by these agencies.

- 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 existing bridge over the New River has the potential to serve as a movement corridor for small and common wildlife species, such as rodents, reptiles, and small mammals. The closest alternative crossing points are at Gentry Road, approximately 2.5 miles southeast of the Proposed Project, and a small foot crossing, approximately 0.7 mile northwest of the Proposed Project. Although the existing bridge could serve as a wildlife corridor, particularly for nocturnal terrestrial species when traffic volume is assumed to be lower (lower collision risk), a new bridge would be constructed after removal of the existing bridge. This corridor would be unavailable for the duration of the Proposed Project's construction. While the terrestrial wildlife that use this corridor would be temporarily impacted, avian species and any fish species found in the New River would not be impacted. The flow of the New River would not be disrupted as a result of the Proposed Project as the removal of the existing bridge would be accomplished without the need to be in the New River and all anticipated construction activities would take place from the banks. Therefore, fish species such as common carp (*Cyprinus carpio*), channel catfish (*Ictalurus punctatus*), and Mozambique tilapia (*Oreochromis mossambicus*) would not be impacted by the Proposed Project. A less than significant impact would result from the Proposed Project.

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

e) No local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, apply to the Proposed Project site.

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

f) The Proposed Project is not located within an area covered by an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Cumulative Impacts:

The Proposed Project site contains wetlands and jurisdictional waters of the U.S. and the State. The Proposed Project may trigger an application for waters permits to occur; however, implementation of the proposed mitigation measures identified below would mitigate the Proposed Project's cumulative biological resource impacts to below the level of significance.

V. CULTURAL RESOURCES

A cultural resources records search was conducted by Environmental Intelligence, LLC (EI) staff at the California Historical Resources Information System (CHRIS), South Coastal Information Center (SCIC) at San Diego State University on August 30, 2019. The records search identified all previously recorded cultural resources and cultural resource studies within the records search extent, which is defined as a ¼-mile radius around the Area of Potential Impacts (API). No previous cultural resource studies had been conducted within the API or within a ¼-mile radius. Additionally, no cultural resources had been previously recorded within the records search extent.

EI reviewed the Caltrans Historic Bridge Inventory for Local Agency Bridges to determine the potential historical significance of the Lack Road Bridge. The Caltrans Historic Bridge Inventory for Local Agency Bridges lists the Lack Road Bridge as bridge number 58C0101 - New River (Lack Road). It was constructed in 1940 and its location is listed as 4.2MI N/O SR-86. The bridge's historical significance is listed as a Category 5 (Bridge not eligible for National Registrar of Historic Places [NRHP]).

EI archaeologist Ms. Amber Lopez-Johnson (M.A.) conducted an intensive pedestrian survey of the API on September 26, 2019. The API was surveyed using transects spaced no greater than 15 meters apart. The archaeologist examined exposed ground surface for artifacts (e.g., flaked stone tools, tool-making debris, milling tools, ceramics, ecofacts [e.g., marine shell and bone], soil discoloration that might indicate the presence of a cultural midden, and features indicative of the former presence of structures or buildings [e.g., standing exterior walls, postholes, foundations] or historic debris [e.g., metal, glass, ceramics]). Ground disturbances such as burrows were visually inspected. EI used EOS Arrow GNSS 100 Series global positioning system (GPS) units with sub-meter accuracy and ArcGIS Collector Software to confirm all API footprints and record any geospatial data for newly or previously recorded resources. All new and previously recorded resources within the API were documented, photographed, and recorded on California Department of Parks and Recreation (DPR) 523 forms. No cultural material was identified within the API during the pedestrian survey. The API is located within an area that has been previously disturbed by ongoing agricultural activities. Based on the agricultural activities within the API, the potential for encountering subsurface cultural deposits within the API is considered low. The results of the records search and Intensive pedestrian survey were documented in the Cultural Resources Survey Report, included as Appendix B (Cultural Resources Survey Report, 2019 [Updated 2020]).

Would the project:

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

a) No historical resources have been documented within the Proposed Project area. Given the previous agricultural disturbance in the area, the potential to encounter historical resources within the Proposed Project area would be considered low. Therefore, less than significant impacts are expected.

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

b) No archaeological resources have been previously recorded within the Proposed Project area. There is potential for archaeological resources to be found during excavation and grading. However, given the previously disturbed nature of the Proposed Project area, the potential to encounter archaeological resources within the Proposed Project area would be considered low. The ICPDS received a comment letter from the Campo Band of Mission Indians on December 19, 2019 (see Appendix D). Based on the information provided by the Campo Band of Mission Indians, the ICPDS is willing to implement MM-TCR-1 through MM-TCR-3 (see Section XVIII. Tribal Cultural Resources, below) for the Proposed Project. The Proposed Project would comply with these mitigation measures to avoid or reduce impacts to a tribal cultural resource to less than significant levels. Therefore, the Proposed Project would comply with these mitigation measures in order to not cause an adverse change in the significance of an archaeological resource and reduce impacts to less than significant levels.

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

c) No formal cemeteries are located within the Proposed Project area. Additionally, no known archaeological sites are located within the vicinity of the Proposed Project area, which could indicate the presence of human remains interred outside of dedicated cemeteries. Given the previously disturbed nature of the Proposed Project area, the potential to encounter human remains would be considered low. Nevertheless, based on the information provided by the Campo Band of Mission Indians comment letter (see Appendix D), the Proposed Project would implement MM-TCR-2 and MM-TCR-3 (see Section XVIII. Tribal Cultural Resources, below) to ensure impacts related to the disturbance of human remains, would be less than significant.

Cumulative Impacts:

Proposed Project implementation would not result in significant impacts to cultural resources. Therefore, the Proposed Project's contribution to a cumulative impact would not be considerable and potential cumulative impacts to cultural resources would be less than significant.

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 construction and operation of the Proposed Project would not require the creation of a new source of energy. The Proposed Project, as a bridge replacement project, would not have an electrical component as overhead lighting is not part of the design; therefore, no unnecessary consumption of energy is anticipated.

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

b) State and local agencies regulate the use and consumption of energy through various programs. As a result of the passage of AB 32 (California Global Warming Solutions Act of 2006), which seeks to reduce the effects of greenhouse gas (GHG) emissions, a majority of the State regulations are intended to reduce energy use and GHG emissions. The Proposed Project would be consistent with State regulations regarding GHG emissions (refer to Section 3.8 [GHG Emissions]). Energy consumption as part of the construction would be minimal and temporary. Additionally, no energy would be used during the operational life of the new bridge. As such, the Proposed Project would not conflict with or obstruct a State or local plan for renewable energy and energy efficiency. No impacts would occur.

Cumulative Impacts:

As identified above, the Proposed Project, as a bridge replacement project, would not unnecessarily consume energy resources or conflict with energy plans. As a result, no energy impacts would occur as a result of the Proposed Project, therefore the Proposed Project would not contribute to cumulative impacts.

VII. GEOLOGY AND SOILS

Would the project:

The County Public Works Department contracted NV5 to conduct a geotechnical study of the Proposed Project site and prepare a foundation report. The Draft Foundation Report prepared by NV5 is included as Appendix C (Draft Foundation Report, 2019). The purpose of the foundation report was to summarize the results of the geotechnical study and provide seismic and foundation design recommendations for the proposed replacement of the existing bridge. Discussions and determinations within this section are based on the results of the Draft Foundation Report.

Southern California is a seismically active region that contains several surface faults and fault zones considered active or potentially active, including the Newport-Inglewood, Whittier, San Andreas, San Jacinto, Malibu-Coast-Raymond, Chino, Elsinore, Palos Verdes, San Gabriel, and Sierra Madre-Santa Susana-Cucamonga faults.

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

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

1) The most recent Alquist-Priolo Earthquake Fault Zoning Maps were reviewed and the Proposed Project site is not included within any Earthquake Fault Zones as created by the Alquist-Priolo Earthquake Fault Zoning Act. The Brawley Seismic Zone is located approximately 2 miles east of the Proposed Project. The Elmore Ranch Fault is the nearest known fault, located approximately 6 miles to the southwest of the Proposed Project site (California Department of Conservation, 2010). Given the distance of the Proposed Project from known faults and seismic zones, the Proposed Project would not be expected to expose people or structures to rupture as a result of a known earthquake fault. No impacts would occur.

- 2) Strong Seismic ground shaking?

2) As discussed above, the Brawley Seismic Zone and the Elmore Ranch Fault are located approximately 2 miles east and 6 miles southwest, respectively. While no known faults or fault zones are located in close proximity to the Proposed Project site, risk of seismic activity is present due to the seismically active nature of the region. The Proposed Project would be designed using seismic recommendations in accordance with current Caltrans standards and engineering practices. Therefore, the Proposed Project's compliance with the current Caltrans standards (Bridge Design Practices

and Seismic Design Criteria) and AASHTO Bridge Design Specifications with California Amendments, as well as the recommended mitigation measures (MM-GS-1) would significantly reduce the potential for substantially adverse effects from strong seismic ground shaking. The Proposed Project would result in less than significant impacts with mitigation incorporated.

MM-GS-1:

The Applicant shall ensure all grading operations and construction are conducted in accordance with the Plans and Specifications and in conformance with the recommendations included in the Draft Foundation Report (Appendix C) and any subsequent geotechnical and soils report to be prepared by a licensed geotechnical engineer.

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

3) Liquefaction occurs when unconsolidated, water-laden soils are shaken and lose cohesion, causing previously solid soils to behave temporarily as viscous liquids. It is most prevalent in areas of recently deposited silts or sands, and in areas with high groundwater levels. Liquefaction may lead to near-surface ground failure, such as ground settlement, lateral spread, and loss of foundation support. The Draft Foundation Report stated a subsurface exploration program encountered poorly to moderately consolidated alluvial clay and silty sands. A liquefaction assessment was completed by NV5 and the results of the liquefaction assessment were presented in the Draft Foundation Report (Appendix C). Due to the potential for liquefaction and associated seismic induced settlement, the proposed new bridge's pile design would need to accommodate potential downdrag forces. The design of the Proposed Project would comply with the current Caltrans standards (Bridge Design Practices and Seismic Design Criteria), AASHTO Bridge Design Specifications with California Amendments, and the recommendations in the Draft Foundation Report (see mitigation measure MM-GS-1), which would reduce impacts related to seismic ground failure and liquefaction to less than significant levels.

- 4) Landslides?

4) The Proposed Project site is located in a flat area with no high or steep natural slopes. The Draft Foundation Report stated no indications of landslides or deep-seated instability were observed at the Proposed Project site during the geotechnical study (Appendix C). As such, the potential for landslides would be considered low. There would be no potential for the Proposed Project to expose people or structures to landslides. Less than significant impacts are expected.

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

b) During construction, loss of topsoil and erosion could result from construction activities, including the operation of heavy machinery, grading activities, excavation, or wind or water erosion of stockpiled fill/excavated materials at staging areas. Erosion would be minimized through the implementation of best management practices (BMPs) such as limiting the amount of disturbed soil to the extent possible, preventing runoff from the site, and ensuring compliance with the Stormwater Pollution Prevention Plan (SWPPP; discussed in greater detail in the Hydrology and Water Quality section below). In addition, the Proposed Project site is relatively flat and experiences low levels of natural erosion (County of Imperial, n.d.). As such, with implementation of BMPs and compliance with the SWPPP, impacts related to soil erosion or the loss of top soil would be less than significant.

- 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 Draft Foundation Report identified the Proposed Project site as underlain with predominantly poorly to moderately consolidated alluvial materials consisting of lean clay with lenses of fat clay, silty sands and clayey sands. As discussed above, the potential for landslides is considered low. Lateral spreading occurs when there is widespread liquefaction and a gentle slope, or a free face toward which lateral spreading may occur. As discussed above, liquefaction impacts would be less than significant with mitigation incorporated (MM-GS-1). Additionally, the Draft Foundation Report stated the liquefiable layers are located below the elevation of the stream channel and abutment slope face. Furthermore, the piles for the existing bridge would not be removed from the New River, which the Draft Foundation Report assumes would provide some dissipation of additional lateral pressures resulting from an earthquake event. Thus, the Draft Foundation Report determined the potential for lateral spreading is considered low. Therefore, with incorporation of mitigation measure MM-GS-1, the Proposed Project would result in less than significant impacts.

- d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?

d) As discussed above, the Proposed Project site is underlain with lean clay with lenses of fat clay, silty sands, and clayey sands. The geotechnical study tested two (2) samples of the near-surface clay soils, which indicated medium expansion

potential. As these materials are generally considered unsuitable for use as backfill for structure foundations, retaining walls, or pipe bedding, the foundation report recommended potential expansive soil properties should be verified at the completion of rough grading since site grading will redistribute on-site soils. Compliance with Caltrans standards (Bridge Design Practices and Seismic Design Criteria), AASHTO Bridge Design Specifications with California Amendment, recommendations from the Proposed Project's Draft Foundation Report (MM-GS-1), and mitigation measure MM-GS-2 included below would ensure that risks from expansive soil would be less than significant.

MM-GS-2:

Soils imported for on-site use shall preferably have very low to low expansion potential (based on UBC Standard 18-2 test procedures). Lots on which expansive soils may be exposed at grade shall be undercut 3 feet or more and capped with very low to low expansion potential fill. In the event expansive soils are present near the ground surface, special design and construction considerations shall be utilized in general accordance with the recommendations of the geotechnical consultant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
- e) The Proposed Project consists of a bridge replacement and there are no planned facilities that require a wastewater disposal system. Therefore, the Proposed Project would not include septic tanks or alternative wastewater disposal systems. No impact from septic tanks or alternative wastewater disposal systems as part of the Proposed Project would occur.
- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- f) As shown on the California Division of Mines and Geology, 1:250,000 Geologic Map of the Salton Sea (Jennings, 1967), the Proposed Project area is underlain by Quaternary lake sediments (Ql), which have a high sensitivity for paleontological resources. However, given the previously disturbed nature of the Proposed Project area, the potential to encounter a paleontological resource would be considered low and potential impacts to paleontological resources would be less than significant.

Cumulative Impacts:

The development of cumulative projects in the area has the potential to impact geologic resources. However, geological impacts are site-specific and are expected to be minimal to none from a cumulative geological standpoint. Similar to the Proposed Project, any related projects' potential impacts related to geology and soils would be assessed on a case-by-case basis. MM-GS-1 and MM-GS-2 would be implemented during the construction phase of the Proposed Project to reduce potential impacts. Therefore, with the implementation of mitigation measure, the Proposed Project's cumulative impacts related to geology and soils would be reduced to a less than significant level.

VIII. GREENHOUSE GAS EMISSION

Constituent gases of the Earth's atmosphere, called atmospheric GHGs, play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent GHGs contributing to this process include carbon dioxide (CO₂), methane (CH₄), ozone, water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 40 percent of the State's GHG emissions (CARB, 2019). Emissions of CO₂ and N₂O are byproducts of fossil fuel combustion. Methane, a potent GHG, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean.

Assembly Bill 32 (Global Warming Solutions Act of 2006)

The Global Warming Solutions Act (commonly referred to as AB 32) requires a Statewide commitment and effort to reduce GHG emissions to 1990 levels by 2020 (25 percent below business as usual). To effectively implement the 2020 goal, AB 32 requires the CARB to develop appropriate regulations and to establish a mandatory reporting system to track and monitor GHG emission levels from stationary sources.

This bill is the first Statewide policy in the United States to mitigate GHG emissions and includes penalties for noncompliance. As with the goals and targets set by other GHG emissions-related actions taking place at the regional and international levels, AB 32 sets precedence in requiring an inventory and reduction of GHG emissions in the State.

Currently, six (6) GHGs are regulated by the federal and State government: CH₄, CO₂, hydrofluorocarbons (HFCs), N₂O, perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). The CARB also includes nitrogen trifluoride (NF₃) in its inventory of monitored GHGs in California.

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) Construction of the Proposed Project would require the use and transport of chemicals and materials typically associated with precast concrete bridge structures, paving, and other chemicals associated with construction. The use of these materials would be temporary and limited to the immediate area of application during the construction phase. The use, transport, and disposal of these materials would be completed in a manner that is consistent with the State requirements and manufacturer's recommendations and would ensure that there would not be a significant hazard to the public or the environment.

The New River flows beneath the existing bridge, which is classified as a Class 4 waterway (Appendix C). During construction, the existing bridge would be removed. However, these activities would be conducted above the New River. All construction activities are anticipated to take place from the banks. While direct contact with the New River would not be necessary as part of the Proposed Project's construction activities, site grading would redistribute on-site soils that may need to be collected and disposed of. These soils may be contaminated from the New River. If these soils are contaminated, the temporary disturbance and potential disposal of these soils during grading may create a significant hazard to the public and environment. The Proposed Project would implement mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6, including the preparation and implementation of a Contaminated Soil Management Plan, to minimize associated risks and ensure applicable statutory and regulatory standards and requirements are complied with in the event contaminated soils are encountered. Implementation of mitigation measures would ensure that potentially contaminated soils are identified, removed, and properly disposed of to prevent the creation of significant hazard to the public and the environment to the maximum extent feasible and reduce impacts to less than significant levels.

During operations, the Proposed Project's new bridge would not require the routine transport, use or disposal of hazardous materials. It is anticipated that hazardous materials would not be transported as a result of the new bridge or that materials requiring training, professional use, or transport to a designated hazardous disposal facility would not be frequently applied or used on the new bridge. Therefore, the Proposed Project would not cause a significant hazard to the public or environment during operation and impacts would be less than significant.

MM-HAZ-1:

Prior to construction activities, a soils investigation shall be conducted to determine the presence of contaminated soils on the Proposed Project site.

MM-HAZ-2:

A Contaminated Soil Management Plan shall be prepared and implemented during construction that contains procedures to be followed in the event that contaminated soils are encountered during construction of the Proposed Project. The Contaminated Soil Management Plan shall include procedures for the proper identification, removal, and disposal of contaminated soils. A copy of the Contaminated Soil Management Plan shall be provided to the Imperial County Environmental Health Department.

MM-HAZ-3:

The Applicant shall contact the appropriate regulatory agencies identified in the Contaminated Soil Management Plan if contaminated soils are encountered.

MM-HAZ-4:

Sampling and analysis of soils known or suspected to be impacted by hazardous materials shall be conducted in accordance with the procedures detailed in the Contaminated Soil Management Plan.

MM-HAZ-5:

Procedures for the proper handling, storage, treatment, transport, and disposal of contaminated soil shall be conducted in consultation with the appropriate regulatory agencies and in compliance with applicable statutory and regulatory requirements.

MM-HAZ-6:

A Worker Health and Safety Plan shall be prepared and implemented prior to the start of construction activities. The Worker Health and Safety Plan shall identify the nature and extent of contaminants that may be encountered during construction, appropriate health and environmental protection measures and equipment, and emergency response procedures. The Worker Health and Safety Plan shall also include the following New River Health and Safety Considerations, which shall be adhered to prior to the start of and throughout construction activities:

- The Proposed Project Contractor shall be advised that the New River flows beneath the Proposed Project site.

- As the New River is known to contain bacteria-laden foam that can blow over to nearby sites on windy days, precautions shall be identified and taken when working close to the New River on windy days (wind gusts in excess of 15 miles per hour).
- Construction workers shall be prohibited from drinking water from the New River.
- To assist in preparing for the risk associated with construction activities close to the New River, a model risk assessment is available on the Occupational Safety and Health Administration website (<http://www.dir.ca.gov/dosh/>).

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) As previously stated, construction of the Proposed Project would require the use of chemicals and materials typically associated with precast concrete bridge structures, paving, and other chemicals associated with construction. The use of these materials would be temporary and would be limited by the construction duration and location and in quantity. Additionally, they would be transported, used, and disposed of in a manner that is consistent with the State requirements and manufacturers recommendations and would not create a significant hazard to the public or environment. As discussed above, the New River is a polluted waterway that flows underneath the Proposed Project. As a result of the pollution in the New River, the soils on the Proposed Project site may be contaminated and, if contaminated, could create a significant hazard and release of hazardous materials into the environment during grading. Implementation of mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 would ensure that the Proposed Project would not release hazardous materials into the environment and create a significant hazard if contaminated soils are encountered.

The Proposed Project, as a bridge replacement project, would not involve the use of hazardous materials during operation. Thus, operation of the Proposed Project would not create a significant hazard to the public or environment through the accidental release of hazardous materials into the environment. Therefore, implementation of mitigation measures would reduce impacts related to hazardous materials to less than significant levels.

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 closest school, Westmorland Elementary School is located approximately 4.7 miles southeast of the Proposed Project site (Google Earth, accessed 2019). As previously noted in the responses to IXa and IXb above, while the Proposed Project may release hazardous materials into the environment with the disturbance of soil that may be contaminated by the polluted New River during construction, the Proposed Project would not emit hazardous emissions or handle hazardous materials within one-quarter mile of existing or proposed schools. As a result, the Proposed Project would not pose a risk to nearby schools and less than significant impacts would occur.

d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

d) A review of the Department of Toxic Substances Control's (DTSC's) and State Water Resources Control Board's (SWRCB's) databases (EnviroStor and Geotracker) were completed for the Proposed Project. The nearest cleanup site is located approximately 1.6 miles northeast of the Proposed Project. This cleanup site was deemed complete and the case was closed as of August 25, 1992 (SWRCB, 2019). The Proposed Project crosses the New River, which is a Class 4 contaminated waterway (Appendix C). The New River is included in the 2006 Clean Water Act Section 303 (d) list, which identifies waters that are too polluted or otherwise degraded to meet water quality standards set by states, territories, or authorized tribes. The New River conveys agricultural runoff from Mexicali and Imperial Valley, as well as contamination from urban runoff from Mexicali. The New River exhibits very poor water quality as it is known to transport community and industrial wastewater, raw and inadequately treated sewage, toxic industrial waste, garbage and other solid wastes, animal wastes, and occasionally geothermal wastewaters. As discussed above, direct contact with the New River would not be necessary as part of the Proposed Project's construction activities as these activities would take place from the banks. While direct contact with the New River would not be necessary as part of the Proposed Project's construction activities, soils on the Proposed Project site encountered during grading may be contaminated from the New River. If these soils are contaminated, a significant hazard to the public and environment may be created. The Proposed Project would implement mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 to minimize associated risks and ensure applicable statutory and regulatory standards and requirements are complied with in the event contaminated soils are encountered. With implementation of these mitigation measures, impacts related to the creation of a significant hazard to the public or environment would be reduced to less than significant levels.

- As the New River is known to contain bacteria-laden foam that can blow over to nearby sites on windy days, precautions shall be identified and taken when working close to the New River on windy days (wind gusts in excess of 15 miles per hour).
- Construction workers shall be prohibited from drinking water from the New River.
- To assist in preparing for the risk associated with construction activities close to the New River, a model risk assessment is available on the Occupational Safety and Health Administration website (<http://www.dir.ca.gov/dosh/>).

- 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) As previously stated, construction of the Proposed Project would require the use of chemicals and materials typically associated with precast concrete bridge structures, paving, and other chemicals associated with construction. The use of these materials would be temporary and would be limited by the construction duration and location and in quantity. Additionally, they would be transported, used, and disposed of in a manner that is consistent with the State requirements and manufacturers recommendations and would not create a significant hazard to the public or environment. As discussed above, the New River is a polluted waterway that flows underneath the Proposed Project. As a result of the pollution in the New River, the soils on the Proposed Project site may be contaminated and, if contaminated, could create a significant hazard and release of hazardous materials into the environment during grading. Implementation of mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 would ensure that the Proposed Project would not release hazardous materials into the environment and create a significant hazard if contaminated soils are encountered.

The Proposed Project, as a bridge replacement project, would not involve the use of hazardous materials during operation. Thus, operation of the Proposed Project would not create a significant hazard to the public or environment through the accidental release of hazardous materials into the environment. Therefore, implementation of mitigation measures would reduce impacts related to hazardous materials to less than significant levels.

- 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 closest school, Westmorland Elementary School is located approximately 4.7 miles southeast of the Proposed Project site (Google Earth, accessed 2019). As previously noted in the responses to IXa and IXb above, while the Proposed Project may release hazardous materials into the environment with the disturbance of soil that may be contaminated by the polluted New River during construction, the Proposed Project would not emit hazardous emissions or handle hazardous materials within one-quarter mile of existing or proposed schools. As a result, the Proposed Project would not pose a risk to nearby schools and less than significant impacts would occur.

- d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

d) A review of the Department of Toxic Substances Control's (DTSC's) and State Water Resources Control Board's (SWRCB's) databases (EnviroStor and Geotracker) were completed for the Proposed Project. The nearest cleanup site is located approximately 1.6 miles northeast of the Proposed Project. This cleanup site was deemed complete and the case was closed as of August 25, 1992 (SWRCB, 2019). The Proposed Project crosses the New River, which is a Class 4 contaminated waterway (Appendix C). The New River is included in the 2006 Clean Water Act Section 303 (d) list, which identifies waters that are too polluted or otherwise degraded to meet water quality standards set by states, territories, or authorized tribes. The New River conveys agricultural runoff from Mexicali and Imperial Valley, as well as contamination from urban runoff from Mexicali. The New River exhibits very poor water quality as it is known to transport community and industrial wastewater, raw and inadequately treated sewage, toxic industrial waste, garbage and other solid wastes, animal wastes, and occasionally geothermal wastewaters. As discussed above, direct contact with the New River would not be necessary as part of the Proposed Project's construction activities as these activities would take place from the banks. While direct contact with the New River would not be necessary as part of the Proposed Project's construction activities, soils on the Proposed Project site encountered during grading may be contaminated from the New River. If these soils are contaminated, a significant hazard to the public and environment may be created. The Proposed Project would implement mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 to minimize associated risks and ensure applicable statutory and regulatory standards and requirements are complied with in the event contaminated soils are encountered. With implementation of these mitigation measures, impacts related to the creation of a significant hazard to the public or environment would be reduced to less than significant levels.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 Proposed Project would not be located within an airport land use plan or within 2 miles of an airport and would not result in a safety hazard for people residing or working in the Proposed Project area. The nearest airport to the Proposed Project is the Cliff Hatfield Memorial Airport which is located approximately 7.2 miles northeast of the Proposed Project site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? f) The Proposed Project would be designed to applicable County and AASHTO standards and, as a result, provide adequate emergency access. The Proposed Project would not reduce the number of traffic lanes or create physical barriers along Lack Road. As the existing bridge has been closed to traffic for over one (1) year due to severe deterioration of some of the pile supports, implementation of the Proposed Project would improve all existing emergency access for adjacent properties and the surrounding community and reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. Therefore, implementation of the Proposed Project would not physically interfere or otherwise impair emergency response or emergency evacuation in the County.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? g) There are no wildlands located adjacent to or within the vicinity of the Proposed Project. In addition, the California Department of Forestry and Fire Protection (CAL FIRE) maintains maps of recommended Very High Fire Hazard Severity Zones (VHFHSZs). According to the map prepared by CAL FIRE for the County, the Proposed Project is located within a Local Responsibility Area (LRA) classified as Unzoned, with the nearest VHFHSZ located approximately 25 miles northwest of the Proposed Project (CAL FIRE, 2007). The Proposed Project would not expose people or structures to the risk of loss, injury, or death as a result of wildland fires beyond existing conditions as a bridge replacement project outside a VHFHSZ. As such, neither people nor structures would be exposed to an anticipated significant risk or loss associated with wildland fires.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cumulative Impacts:

The Proposed Project, as a bridge replacement project, does not pose a direct significant health threat either in the surrounding area or the County. The New River is a Class 4 contaminated waterway and flows underneath the Proposed Project site (Appendix C). As such, the Proposed Project may release hazardous materials into the environment with the disturbance of soil at the Proposed Project site during construction if the soils are contaminated by the polluted New River. However, potentially contaminated soil from the New River as a result of construction of the Proposed Project would be site specific and there is little cumulative relationship between potentially contaminated soils on the Proposed Project site and any related projects. As a result, less than significant cumulative impacts would occur.

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 would be completed in compliance with the established federal, State, and local water quality standards and these standards would apply to all related construction activities as well as storm water and waste discharge from the Proposed Project site during construction. A SWPPP is required for the Proposed Project, and coverage under the Statewide general National Pollutant Elimination System (NPDES) Permit (Construction General Permit [CGP], 2009-0009-DWQ [as amended by 2010-0014-DWQ and 2012-0006-DWQ] – General Permit No. CAS000002) is required. This coverage includes the preparation of a SWPPP prior to grading activities. The SWPPP would address:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- Site Design BMPs;
- Routine structural and non-structural Source Control BMPs;
- Treatment Control BMPs, including consideration of a regional or watershed approach; and
- Inspection/Maintenance BMPs.

The proposed grading activities that would occur in support of the Proposed Project would maintain the existing drainage

pattern at the Proposed Project site.

The Draft Foundation Report (Appendix C) stated groundwater was encountered in exploratory borings at depths between approximately 18 and 19 feet below ground surface. Additionally, water elevation measurements were taken at the New River beneath the existing bridge at approximately 12 feet below the existing roadway. Per the County Health Department, the New River is polluted with both biological and chemical wastes and has been designated as a Class 4 contaminated waterway (Appendix C). As discussed above in Response IXd, the New River is included in the 2006 Clean Water Act Section 303 (d) list, which identifies waters that are too polluted or otherwise degraded to meet water quality standards set by states, territories, or authorized tribes. The New River conveys agricultural runoff from Mexicali and Imperial Valley, as well as contamination from urban runoff from Mexicali. The New River exhibits very poor water quality as it is known to transport community and industrial wastewater, raw and inadequately treated sewage, toxic industrial waste, garbage and other solid wastes, animal wastes, and occasionally geothermal wastewaters. The Proposed Project, as a bridge replacement project, would not result in the discharge of pollutants into the already contaminated New River during operation. However, the grading phase of Proposed Project construction would require temporary disturbance of soils, which could potentially result in the degradation of water quality (surface and groundwater) if the soils are contaminated from the New River. Additionally, during grading and construction, pollutants including sediments, petroleum products, trash, concrete waste, sanitary waste, and chemicals may occur on-site which could also have detrimental effects on water quality. The Proposed Project would implement mitigation measures MM-WQ-1, MM-AQ-1 (see Section III, *Air Quality*, above), and MM-HAZ-1 through MM-HAZ-6 (see Section IX, *Hazards and Hazardous Materials*, above) to ensure impacts to water quality standards and surface and groundwater quality would be less than significant.

MM-WQ-1:

The Applicant shall implement and inspect BMPs. BMP implementation and maintenance for the SWPPP shall be verified through inspection, self-certification, survey or other effective measure by the Applicant, or authorized agent as approved by County Public Works Department. Records (maintenance, operations, inspections) of the BMPs will be made available to the County upon request.

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

b) As discussed above, the Draft Foundation Report (Appendix C) stated groundwater was encountered in exploratory borings at depths between approximately 18 and 19 feet below ground surface. Additionally, water elevation measurements were taken at the New River beneath the existing bridge at approximately 12 feet below the existing roadway. The existing bridge would be removed without the need to be in the New River. All construction activities are anticipated to take place from the banks. If temporary dewatering is necessary, the means and methods of any dewatering scheme shall be established by a local contractor and would require a permit and plan that complies with CRRWQCB regulations (MM-WQ-2). Minimal water use would be required for construction activities as part of the Proposed Project and would be limited to dust suppression. The water used for such activities would be obtained off-site and would not require the use of groundwater. Thus, the Proposed Project, as a bridge replacement project, is not expected to use any groundwater. Accordingly, with implementation of mitigation measure (MM-WQ-2), the Proposed Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge; therefore, impacts would be less than significant.

MM-WQ-2:

If temporary dewatering is necessary, the actual means and methods of any dewatering scheme shall be established by a contractor with local experience. Temporary dewatering shall require a permit and plan that complies with CRRWQCB regulations.

- 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) During Proposed Project construction, erosion could result from construction activities, including the operation of heavy machinery, grading activities, excavation, or wind or water erosion of stockpiled fill/excavated materials at staging areas. Erosion would be minimized through the implementation of BMPs such as limiting the amount of disturbed soil to the extent possible, preventing runoff from the site, and ensuring compliance with the SWPPP, discussed above. In addition, the Proposed Project site is relatively flat with low levels of natural erosion (County of Imperial, n.d.). As such, the Proposed Project would not result in substantial erosion or siltation on- or off-site with implementation of BMPs and compliance with the SWPPP. Therefore, impacts would be less than significant.

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

offsite;

(ii) The New River flows under the Proposed Project site. Water elevation measurements were taken at the New River beneath the existing bridge and were approximately 12 feet below the existing roadway. The Proposed Project includes the replacement of an existing bridge with a new bridge within the same alignment of the existing bridge. An IID culvert is located to the east of the Proposed Project site and empties into the New River. The Proposed Project would not result in alterations or relocation of the IID culvert. As such, the Proposed Project would not substantially increase the rate or amount of surface runoff that would result in flooding of the New River. Therefore, less than significant impacts would occur.

- (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

(iii) The Proposed Project consists of the replacement of an existing bridge with a new bridge structure within the alignment of the existing bridge over the New River. As a bridge replacement project, no increase in runoff water is expected to result from the design of the Proposed Project. As discussed above, an IID culvert is located to the east of the Proposed Project site that empties into the New River. The Proposed Project would not be expected to result in alterations or relocation of the IID culvert. Therefore, the Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. As discussed above, the Proposed Project would include grading during construction, which would disturb soils on-site. These soils may be contaminated from the New River, which could provide additional sources of polluted runoff. However, the Proposed Project would implement MM-WQ-1, MM-AQ-1 (see Section III, Air Quality, above), and MM-HAZ-1 through MM-HAZ-6 (see Section IX, Hazards and Hazardous Materials, above), which would reduce impacts related to the addition of polluted runoff sources to less than significant levels.

- (iv) impede or redirect flood flows?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

(iv) The Proposed Project consists of the replacement of an existing bridge with a new bridge structure within the alignment of the existing bridge over the New River. Though the New River flows beneath the Proposed Project site, the existing bridge would be removed without the need to be in the New River. As all construction activities are anticipated to take place from the banks of the New River, the Proposed Project would not impede or redirect flood flows. Therefore, less than significant impacts would occur.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

d) The Proposed Project is not within a tsunami zone (see Appendix C; California Department of Conservation, 2019). The Draft Foundation Report stated that though there have been no documented occurrences of seiches at the Salton Sea (located approximately 2.3 miles northwest of the Proposed Project site), it is likely that one (1) could occur due to the relatively shallow depth and seismic exposure. However, the Draft Foundation Report determined, given the Proposed Project site's distance to the Salton Sea and that the Proposed Project site is approximately 15 feet higher than the surface of the Salton Sea, the potential for seiches affecting the Proposed Project site is considered low.

The Proposed Project is located in Zone A, which is a special flood area and a 100-year flood hazard area by the Federal Emergency Management Agency (FEMA, 2008). The New River flows beneath the existing bridge within the Proposed Project site. As discussed above, the New River is polluted with both biological and chemical wastes and has been designated as a Class 4 contaminated waterway (Appendix C). Thus, should flooding of the New River occur, pollutants may be released. As discussed above, the existing bridge would be removed without the need to be in the New River. All Proposed Project construction activities are anticipated to take place from the banks. Nevertheless, while the release of pollutants would not be directly caused by Proposed Project, pollutants would indirectly be released from the polluted New River. Typical earthwork guidelines would be implemented for the Proposed Project, including taking precautions during site clearing, excavation, and grading to protect the Proposed Project site from flooding, ponding, or inundation (i.e., temporary provisions during the rainy season and pumps to remove water). In addition, the Proposed Project would implement BMPs, comply with the SWPPP, and comply with mitigation measures MM-AQ-1 (see Section III, Air Quality, above) and MM-HAZ-6 (see Section IX, Hazards and Hazardous Materials, above), which would reduce potential impacts to hydrology and water quality related to release of pollutants due to project inundation in a flood zone to less than significant levels.

- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

e) As discussed, the increase in impervious surfaces posed by the Proposed Project would create and contribute to additional runoff. However, the Proposed Project is designed to include BMPs to capture and control the rate of runoff. Implementation of MM-WQ-1 would ensure that additional runoff water would not exceed the capacity of existing stormwater drainage systems or provide substantial additional sources of polluted runoff and therefore result in less than significant

impacts.

Cumulative Impacts:

The Proposed Project could result in potential impacts related to water quality standards as a result of the Proposed Project's proximity to the polluted New River and the potential presence of contaminated soils on-site. Cumulative projects in the vicinity, individually and cumulatively, could potentially increase and contribute to the degradation of water quality, resulting in cumulative impacts to hydrology and surface water quality. However, as with the Proposed Project, each of the cumulative projects would also be subject to NPDES Permit requirements for both construction and operation. Projects would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs to minimize water quality and hydrologic impacts. In addition, the County Public Works Department reviews all development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Furthermore, with implementation of mitigation measures discussed above, the Proposed Project's impacts to hydrology and water quality would be reduced to less than significant levels. Thus, the Proposed Project's contribution to cumulative impacts to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

Would the project:

The Proposed Project site is surrounded by land designated as Agriculture and zoned as A-3. The County's Zoning Code (Title 9, Chapter 9: A-3 [Heavy Agriculture]) provides the following description for the Heavy Agriculture land use district, and is provided below:

The purpose of the A-3 (Heavy Agriculture) [40 acres or larger typical] Zone is to designate areas that are suitable for agricultural land uses; to prevent the encroachment of incompatible uses onto and within agricultural lands; and to prohibit the premature conversion of such lands to non-agricultural uses. It is a land use that is to promote the heaviest of agricultural uses in the most suitable land areas of the County. Uses in the A-3 zoning designation are limited primarily to agricultural related uses and agricultural activities that are compatible with agricultural uses.

The predominant land use in the vicinity of the Proposed Project is agricultural.

- a) Physically divide an established community?

a) The Proposed Project would be constructed within the same alignment as the existing bridge. The proposed use, design and scale would be consistent with the existing land use and development in the surrounding area. As the existing bridge has been closed for over a year due to severe deterioration, operation of a new and improved bridge as a result of the Proposed Project would improve all existing access to adjacent properties and the surrounding community and reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. The Proposed Project would not include any physical barriers or features that would divide an established community.

- 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) While the Proposed Project is surrounded by land designated as Agriculture and zoned A-3 (Heavy Agriculture), the Proposed Project consists of the replacement of an existing bridge with a new and improved bridge structure that would be reconstructed in the same alignment as the existing bridge over the New River. The Proposed Project would not alter the existing use of the Proposed Project site and, as such, be consistent with all applicable land use plans, policies, and regulations. The Proposed Project would be consistent with the goals and policies of the County General Plan, County Municipal Code, and related ordinances. As further discussed in Section IV. *Biological Resources*, above, the Proposed Project is not located within an area covered by an adopted HCP or NCCP. Therefore, less than significant impacts would occur.

Cumulative Impacts:

As indicated above, Proposed Project implementation is consistent with the existing land use on the Proposed Project site and compatible with the surrounding land uses in the Proposed Project environs. Therefore, implementation of the Proposed Project will not result in any cumulative land use impacts.

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) There are no locally-important mineral resources underlying the Proposed Project site (County General Plan, Conservation

and Open Space Element, 2016). The Proposed Project would not contain elements that would remove, damage, or otherwise result in the loss of a known mineral resource. Therefore, the Proposed Project would not result in the loss of availability of a known mineral resource.

- 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) There are no mineral recovery sites within or neighboring the Proposed Project area (County General Plan, Conservation and Open Space Element, 2016). Therefore, the Proposed Project would not result in the loss of a locally-important mineral resource recovery site.

Cumulative Impacts:

As identified above, the Proposed Project is not designated for mineral resources either by the State of California or the County and is not known to contain such resources. As a result, no mineral resources would be lost with site development and no cumulative impacts would occur.

XIII. NOISE

The County has established noise standards and noise limitations for construction-related activities. The County General Plan Noise Element states construction noise from a single piece of equipment or a combination of equipment, shall not exceed 75 dB L_{eq}, when averaged over an eight (8) hour period, and measured from the nearest sensitive receptor. Additionally, operation of construction equipment in the County is limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. on Saturday with no commercial construction operations permitted on Sunday or holidays (County of Imperial, 2015).

The County has also established land use compatibility noise guidelines. The County General Plan Noise Element provides noise criteria for various land-use designations to determine land use compatibility (see Table 1, County Noise/Land Use Compatibility Guidelines).

TABLE 1: COUNTY NOISE/LAND USE COMPATIBILITY GUIDELINES

Land Use Category	Average-Daily Noise Level (dBA Community Noise Equivalent Level (CNEL))			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential	<60	60-70	70-75	>75
Transient Lodging-Motels, Hotels	<60	60-75	70-80	>80
Schools, Libraries, Churches, Hospitals, Nursing Homes	<60	60-70	70-80	>80
Auditoriums, Concert Halls, Amphitheaters	--	<70	--	>70
Sports Arena, Outdoor Spectator Sports	--	<70	70-75	>75
Playgrounds, Neighborhood Parks	<70	--	70-75	>75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<70	--	70-80	>80
Office Buildings, Business Commercial and Professional	<65	65-75	75-80	>80
Industrial, Manufacturing, Utilities, Agriculture	<70	70-75	75-80	>80

Source: County of Imperial, California, General Plan Noise Element, 2015.

Notes:

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. **Clearly Unacceptable:** New construction or development clearly should not be undertaken.

CNEL is a measure of cumulative noise exposure or the weighted average sound level over a 24-hour period. Many cities and counties use CNEL to apply more conservative evening hour corrections to a 24-hour noise level in order to account for noise sensitive time periods during the evening and night hours when sound appears louder.

The County General Plan Noise Element states a substantial increase in noise levels would be an increase of 5.0 dBA Community Noise Equivalent Level (CNEL) or greater where noise levels are less than the County's normally acceptable noise levels without project implementation. If the noise level without project implementation exceeds the County's normally acceptable noise levels, an increase of 3.0 dBA CNEL or greater would be considered a substantial increase.

The County Noise Abatement and Control Ordinance (Title 9 Division 7, 2017) provides property line noise limitations consistent with the County General Plan Noise Element. The one (1) hour average sound level limit for agricultural land uses is 70 dBA.

The County has also adopted a Right to Farm Ordinance (No.1031). The Right to Farm Ordinance requires a disclosure to land owners near agricultural land operations or areas zoned for agriculture. The disclosure advises land owners that discomfort and inconvenience from machinery and aircraft noise resulting from conforming and accepted agricultural operations as normal and necessary aspect of living in the agricultural areas of the County (County of Imperial, 2015).

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) Construction Noise

The Proposed Project would be expected to generate short-term noise associated with construction activities. The Proposed Project would be required to comply with the County General Plan Noise Element, which as discussed above requires construction activities to be completed between the hours of 7 a.m. to 7 p.m. Monday through Friday, and from 9 a.m. to 5 p.m. on Saturday with no commercial construction operations permitted on Sunday or holidays (County of Imperial, 2015). The USEPA has compiled data regarding the noise generated by typical construction activities (see Table 2, Typical Construction Activity Noise). As shown in Table 2, noise levels would be reduced with distance from construction activities, approximately 6 dBA per doubling distance. As a bridge replacement project, not all typical construction activities presented in Table 2 apply, however, at a minimum grading would be required during construction of the Proposed Project.

TABLE 2: TYPICAL CONSTRUCTION ACTIVITY NOISE

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L _{eq})	Noise Levels at 100 Feet with Mufflers (dBA L _{eq})	Noise Levels at 200 Feet with Mufflers (dBA L _{eq})
Ground Clearing	82	76	70
Excavation, Grading	86	80	74
Foundations	77	71	65
Structural	83	77	71
Finishing	86	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Agricultural land surrounds the Proposed Project site. The nearest sensitive receptors are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project. Based on the noise generated by typical construction activities shown in Table 2, above, and the fact that noise levels reduce approximately 6 dBA per doubling distance, noise experienced at the nearest sensitive receptors would not exceed the County's 75 dB L_{eq} threshold as a result of the Proposed Project's construction activities. Compliance with the County General Plan Noise Element and implementation of MM-NOISE-1 through MM-NOISE-3 would ensure that the Proposed Project's construction noise impacts would be less than significant.

Operational Noise

The existing bridge has been closed to traffic for over one (1) year due to severe deterioration of some of the pile supports. As such, noise generated from traffic does not currently exist at the Proposed Project site. The primary sources of noise in the Proposed Project area include vehicular traffic along the surrounding roadways (including Vail Road, located approximately 0.3 mile north of the Proposed Project site, and Foulds Road, located approximately 0.2 mile south of the Proposed Project site) and agricultural operations such as heavy equipment and vehicle use.

As discussed above, the County Noise Abatement and Control Ordinance (Title 9 Division 7, 2017) limits one (1) hour average sound in agricultural uses to 70 dBA. Additionally, as shown above in Table 1, the County's normally acceptable noise levels for agricultural land uses is less than 70 dBA CNEL. As discussed above, according to the County General Plan Noise Element, a substantial increase in noise levels would be an increase of 5.0 dBA CNEL or greater where noise levels are less than the County's normally acceptable noise levels without project implementation. If the noise level without project implementation exceeds the County's normally acceptable noise levels, an increase of 3.0 dBA CNEL or greater would be considered a substantial increase.

During operation, the Proposed Project's new bridge would generate traffic noise. Should the existing noise levels at the Proposed Project area be less than the County's normally acceptable noise levels for agricultural land uses (less than 70 dBA CNEL), then the Proposed Project would result in a substantial noise increase if the Proposed Project's traffic noise would generate approximately 73.2 dBA or more. Agricultural operations, which can typically include the use of heavy-duty equipment, could reach maximum noise levels of approximately 85 dBA at 50 feet. Should existing noise levels at the

Proposed Project area be approximately 85 dBA and, therefore, exceed the County's normally acceptable noise levels, the Proposed Project would result in a substantial noise increase if the Proposed Project's traffic noise would generate approximately 84.9 dBA or more.

Levels of highway traffic noise typically range from 70 to 80 dBA at a distance of 50 feet from the highway (United States Department of Transportation Federal Highway Administration, 2017). The Proposed Project's new bridge would generate traffic noise. However, because the new bridge would be located on Lack Road, a Minor Collector road classified by the County, and only contain two travel lanes, it is anticipated the new bridge would be used by the surrounding community's marginal number of commuters that either live or work along that stretch of Lack Road. As such, it is expected that the traffic noise generated by the Proposed Project would be substantially lower than the typical 70 to 80 dBA at a distance of 50 feet from a highway. Thus, the Proposed Project's traffic noise would be expected to generate less than 73.2 dBA and 84.9 dBA and, therefore, not result in a substantial noise increase in ambient noise in the vicinity of the Proposed Project.

Noise generated from heavily traveled roads typically attenuates at about 3 dBA per doubling distance. The nearest sensitive receptors are residences located approximately 1.1 miles south and 1.9 miles northeast of the Proposed Project. Due to the anticipated traffic noise generated by the Proposed Project and traffic noise attenuation, a substantial increase in ambient noise levels at these sensitive receptors would not occur. Therefore, impacts would be less than significant.

MM-NOISE-1:

In compliance with the County General Plan Noise Element, operation of construction equipment shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m. on Saturday. No commercial construction operations shall be permitted on Sunday or holidays.

MM-NOISE-2:

Construction activities shall be operated in a manner that limits noise impacts on surrounding uses.

MM-NOISE-3:

Construction contractors shall equip all construction equipment with properly operating and maintained mufflers, consistent with the manufacturer's standards.

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

b) High levels of groundborne noise and groundborne vibration is generated during construction related activities such as excavation, large mechanical pile driving machines, or the use of heavy earthmoving equipment. According to the Federal Transit Administration (FTA), construction equipment could generate vibration velocities at a maximum of 0.089 peak particle velocity (PPV) from a large bulldozer (FTA, 2006). During operation, groundborne noise and groundborne vibration is generated by heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road (FTA, 2006). Loaded trucks can result in a vibration level of approximately 0.076 PPV at a reference distance of 25 feet.

The most restrictive threshold for building damage is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage (FTA, 2006). Regarding human annoyance resulting from groundborne vibration during construction, the FTA has established a vibration impact threshold of 80 VdB and above at residences and buildings where people normally sleep (FTA, 2006). The nearest building is approximately 1.1 miles south of the Proposed Project. The nearest sensitive receptors are residences located approximately 1.1 miles and 1.9 miles northeast of the Proposed Project. Due to distance, vibration generated by the Proposed Project during construction would not result in the generation of vibration in excess of vibration thresholds at the nearest building or the nearest noise sensitive receptors. Therefore, implementation of MM-NOISE-1 through MM-NOISE-3 would ensure that the Proposed Project's construction groundborne vibration impacts would be less than significant.

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

c) The Proposed Project would not be located within an airport land use plan or within 2 miles of an airport and would not result in a safety hazard for people residing or working in the Proposed Project area. The nearest airport to the Proposed Project is the Cliff Hatfield Memorial Airport which is located approximately 7.2 miles northeast of the Proposed Project site.

Cumulative Impacts:

Cumulative noise impacts could occur as a result of increased traffic volumes on local roadways due to future growth and increased development in the vicinity of the Proposed Project site. Cumulative traffic noise impacts are based on the difference between existing traffic volumes and future traffic volumes after build out of the project and in combination with related projects currently

being proposed or built within the vicinity of the Proposed Project site. There are no other projects in the vicinity of the Proposed Project such that a meaningful contribution of traffic or noise would result in a cumulative effect such that noise levels would substantially increase (a substantial increase in noise levels would be an increase of 5.0 dBA CNEL or greater where noise levels are less than the County's normally acceptable noise levels without project implementation. If the noise level without project implementation exceeds the County's normally acceptable noise levels, an increase of 3.0 dBA CNEL or greater would be considered a substantial increase). Cumulative impacts would be less than significant.

XIV. POPULATION AND HOUSING

Would the project:

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

a) The Proposed Project would consist of the replacement of the severely deteriorated existing bridge with a new precast concrete bridge along Lack Road over the New River. No housing units are proposed. While the Proposed Project would provide a few temporary employment opportunities during construction, it is expected that these jobs would be filled by the workforce in the surrounding communities; therefore, no indirect population growth is anticipated. As a bridge replacement project, no growth inducing extensions of infrastructure, including roadways, are proposed as part of the Proposed Project. As such, the Proposed Project would be consistent with the grown and development in the area and would not induce population growth in the area, either directly or indirectly.

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

b) As a bridge replacement project, there are no housing facilities located on the Proposed Project site. While there are a few scattered residences on the surrounding agricultural land, no housing units would be removed as part of the Proposed Project. As such, there would be no displacement of any person or persons. The Proposed Project would not alter the location, distribution, density, or growth of the human population in the area. Therefore, the Proposed Project would not be expected to result in impacts to population and housing related to displacement of people or housing necessitating the construction of replacement housing.

Cumulative Impacts:

The Proposed Project is consistent with the County's General Plan. As a bridge replacement project, the Proposed Project would not contribute to cumulative effect as no housing and no displacement of people or housing are proposed. Therefore, the Proposed Project's cumulative contribution would not significantly impact population and housing.

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:

- 1) Fire Protection?

1) The Proposed Project area is serviced by the Imperial County Fire Department (ICFD). The ICFD has eight (8) stations and six (6) contracting agencies providing fire protection services throughout the County (ICFD, 2019). The nearest fire station to the Proposed Project site is the Westmorland Volunteer Fire Station, located approximately 4.5 miles southeast of the Proposed Project site. The fire station currently operates with 22 volunteers and one part-time fire chief. It serves the areas within the City of Westmorland and the County (City of Westmorland, 2019). The Proposed Project would replace the severely deteriorated existing bridge along Lack Road over the New River with a new precast concrete bridge. The existing bridge would be removed without the need to be in the New River. The new bridge dimensions would be 35 feet and 6 inches wide by 125 feet long, with a structure depth of 7 feet and 0.875 inches. The Proposed Project's new bridge would be reconstructed at approximately the same alignment with two (2) 12-foot lanes designed to support a 55 mph vehicular speed. Shoulder widths would be 4 feet on the bridge, and would transition to the existing width at the roadway conform points. All construction activities are anticipated to take place from the banks. The existing bridge has been non-operational for over a year. As such, no traffic detour plan or temporary signage would be needed during construction. The Proposed Project would

not include any other land uses and, therefore, would not induce population growth in the Proposed Project area necessitating the need for additional fire protection. The Proposed Project would comply with applicable requirements of ICFD and construction plans would be subject to approval by ICFD. Therefore, the Proposed Project would not increase demand for fire protection services, nor degrade the quality of existing fire protection services.

2) Police Protection?

2) The Imperial County Sheriff's Office (ICSO) provides law enforcement services in the County. The nearest ICSO station is located approximately 10.5 miles southeast of the Proposed Project. The Proposed Project would replace the severely deteriorated existing bridge along Lack Road over the New River with a new precast concrete bridge. As a bridge replacement project, the Proposed Project would not include any other land uses. The Proposed Project would therefore not induce population growth in the area. As a result, no additional police protection would be required. Therefore, the Proposed Project would not increase demand for police protection services, nor degrade the quality of existing police protection services.

3) Schools?

3) The Proposed Project would not directly increase demand for public schools in the County. As a bridge replacement project, the Proposed Project would not generate employment that result in a substantial demand on school services. Furthermore, as discussed in Section XIV. *Population and Housing*, above, the Proposed Project would not directly or indirectly induce any population growth in the Proposed Project area. Therefore, the Proposed Project would not increase demand on schools.

4) Parks?

4) The Parks and Recreation Division of the County Department of Public Works is dedicated to the improvement, repair, expansion, and implementation of parks and recreation through the County. The nearest County park is Red Hill Park, located approximately 7 miles northeast of the Proposed Project. As discussed in Section XIV. *Population and Housing*, above, the Proposed Project would not directly or indirectly induce any population growth in the Proposed Project area. Therefore, the Proposed Project, as a bridge replacement project, would not cause an increase in population that would create a need for additional parks. As a result, the Proposed Project would not increase demand for park facilities.

5) Other Public Facilities?

5) The nearest public library, Imperial County Free Library, and post office are located approximately 7.8 miles east of the Proposed Project. As discussed in Section XIV. *Population and Housing*, above, the Proposed Project would not directly or indirectly induce any population growth in the Proposed Project area. No additional public facilities would be needed as a result of the Proposed Project. Therefore, the Proposed Project would not increase demand on other public facilities.

Cumulative Impacts:

The area in which the Proposed Project is located is currently supported by adequate public services, including fire protection, police protection, public school facilities, library, and park facilities. As a bridge replacement project, the Proposed Project would not substantially affect the existing level of public services provided in the area. Therefore, the Proposed Project's cumulative contribution to Public Services within the County would be considered less than significant.

XVI. RECREATION

The Parks and Recreation Division of the County Department of Public Works is dedicated to the improvement, repair, expansion, and implementation of parks and recreation through the County. The nearest County park is Red Hill Park, located approximately 7 miles northeast of the Proposed Project.

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 would entail the replacement of an existing bridge with a new and improved bridge structure within the same alignment as the existing bridge over the New River. As such, the Proposed Project would not directly or indirectly induce population growth in the project area necessitating the increase in use of existing neighborhood and regional parks. Accordingly, no impacts related to increased use of existing neighborhood and regional parks would occur.

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 is a bridge replacement project and, therefore, would not include or require the construction or expansion of recreational facilities. No impact would occur.

Cumulative Impacts:

The Proposed Project would not significantly increase the demand or wear for recreational facilities. Therefore, the Proposed Project would not contribute to cumulative adverse impacts to recreation facilities within the County.

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) During the construction of the new bridge along the same alignment as the existing bridge, Proposed Project-related traffic would be temporary. Traffic during construction would include workers traveling to and from the Proposed Project site, trucks hauling construction materials to the Proposed Project site, and transporting material off-site. Though the Proposed Project would generate construction traffic on the local roadway network and along this section of Lack Road which currently experiences no traffic since the existing bridge has been closed for over a year, the construction traffic would be temporary and occurring throughout the day, generally during non-peak hours. As such, the construction traffic would not generate a substantial impact to the surrounding roadways. Therefore, construction traffic would not be expected to conflict with a program plan, ordinance or policy addressing the circulation system, and impacts would be less than significant.

The County General Plan's Circulation and Scenic Highways Element was adopted in 2008, prior to the closure of the existing bridge. The Circulation and Scenic Highways Element was prepared in conjunction with the Southern California Association of Governments (SCAG) Regional Transportation Plan, "Destination 2030," and other related transportation planning documents (County of Imperial, 2008). The Circulation and Scenic Highways Element included projected street segment configurations and volumes throughout the County, including for Lack Road, which is designated as a Minor Collector road. Thus, traffic along this section of Lack Road and over the bridge was anticipated and accommodated for in the Circulation and Scenic Highways Element. As the new bridge would be within the same alignment and have the same number of lanes (one [1] in each direction) as the existing bridge, operation of the Proposed Project is not anticipated to generate an increase in traffic beyond the traffic accommodated for in the County's General Plan. Therefore, the Proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, and operational impacts would be less than significant.

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

b) CEQA Guidelines 15064.3 states vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. CEQA Guidelines 15064.3 subdivision (b) provides several criteria for analyzing transportation impacts, including analyzing a project's VMT qualitatively when lead agencies may not be able to quantitatively estimate VMT for a project type. The Proposed Project would replace an existing deteriorated bridge that has been closed for over a year with a new bridge within the alignment of the existing bridge. The new bridge would have the same number of lanes (one [1] in each direction) as the existing bridge. Though the Proposed Project would generate more vehicular traffic than existing vehicular traffic on the Proposed Project site, due to the closure of the bridge, implementation of the Proposed Project would improve vehicular traffic on adjacent properties and roads in the surrounding community as the Proposed Project would circulate the traffic as well as reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. Additionally, the Governor's Office of Planning and Research (OPR) has developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which states replacement projects designed to improve the condition of existing transportation assets, including bridges, would not likely lead to a substantial or measurable increase in vehicle travel and, therefore, generally should not require an induced travel analysis (OPR; 2018). Thus, the Proposed Project is anticipated to be consistent with CEQA Guidelines section 15064.3 subdivision (b) and impacts are expected to be less than significant.

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

c) The Proposed Project would consist of the replacement of an existing severely deteriorated bridge with a new bridge designed to applicable County and AASHTO standards. As such, the Proposed Project would not include a geometric design feature that would increase hazards or result in incompatible uses. As commuters currently that live and work along this stretch of Lack Road are required to utilize lengthy detours due to the closure of the existing bridge for over a year, the Proposed Project would improve passage for commuters. The Proposed Project would comply with the standards of Caltrans and ICFD. Additionally, the Proposed Project would utilize standards as set out in the California Manual on Uniform Traffic

Control Devices for operational traffic control devices as appropriate and would further incorporate traffic control measures that are designed to ensure the safety of all road users. Therefore, the Proposed Project would result in less than significant impacts related to hazardous design features or incompatible uses.

- d) Result in inadequate emergency access?
- d) The Proposed Project would be designed to applicable County and AASHTO standards and, as a result, provide adequate emergency access. The Proposed Project would not reduce the number of traffic lanes or create physical barriers along Lack Road. As the existing bridge has been closed to traffic for over one (1) year due to severe deterioration of some of the pile supports, implementation of the Proposed Project would improve all existing emergency access for adjacent properties and the surrounding community and reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. Therefore, the Proposed Project would not include or create any physical barriers on roadways that would impede emergency access within the area or to the Proposed Project site.

Cumulative Impacts:

Proposed Project implementation is anticipated to contribute traffic along Lack Road. However, the Proposed Project would not generate an increase in traffic compared to the traffic generated on the existing bridge prior to its closure over a year ago or anticipated in the County's General Plan, as the Proposed Project's new bridge would be within the same alignment and have the same amount of lanes as the existing bridge. In addition, the Proposed Project would be design to applicable County and AASHTO standards. Furthermore, implementation of the Proposed Project would improve vehicular traffic on adjacent properties and roads in the surrounding community, as the Proposed Project would circulate the traffic as well as reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. Thus, as indicated in the preceding analysis, the Proposed Project's traffic impacts would be less than significant. Therefore, the Proposed Project's cumulative contribution would not result in significant cumulative transportation impacts.

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:
- | | | | |
|---|-------------------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. 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 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(i) Should it be determined that the Proposed Project requires a Notice of Preparation or a Notice of ND/MND, the Lead Agency would be required to conduct formal consultation with California Native American Tribes who identify as being traditionally and culturally affiliated with the Proposed Project area pursuant to AB 52 to determine potential impacts to tribal cultural resources as defined in Public Resources Code Section 21074. The CEQA Lead Agency must begin the AB 52 consultation process prior to the release of a ND, MND, or EIR. The AB 52 consultation process shall begin with the Lead Agency providing written notification to California Native American Tribes who identify as being traditionally and culturally affiliated with the Proposed Project area. The written notification would include a brief description of the Proposed Project, its location, the contact information for the ICPDS, the Lead Agency for the Proposed Project, and notification that the California Native American Tribe has 30 days to request consultation. AB 52 consultation notification letter was sent by the ICPDS on December 10, 2019. Response comment letters were received from the Quechan Indian Tribe (via email) on December 13, 2019, December 23, 2019 and February 7, 2020 (see Appendix D). A comment letter from Campo Band of Mision Indians was received on December 19, 2019 (see Appendix D). The comments provided by the Quechan Indian Tribe have been acknowledged by the ICPDS and the Cultural Resources Survey Report (Appendix B) has been updated accordingly. Based on the information provided by the Campo Band of Mission Indians, the ICPDS is willing to implement MM-TCR-1 through MM-TCR-3 for the Proposed Project to ensure impacts to tribal cultural resources would be avoided or reduced to less than significant levels.

MM-TCR-1:

During ground disturbing activities for the Proposed Project, a Kumeyaay cultural monitor from the Campo Band of Mission Indians shall be present to ensure Kumeyaay cultural resource are not overlooked.

MM-TCR-2:

During construction, should the Proposed Project disturb the cultural landscape or the ancestors of the Campo

Band of Mission Indians, the Applicant and the ICPDS shall coordinate with the Campo Band of Mission Indians to determine the best course of action.

MM-TCR-3:

Should ancestral remains of the Campo Band of Mission Indians be disturbed during the construction of the Proposed Project, the Applicant and the ICPDS shall coordinate with the Campo Band of Mission Indians to provide financial compensation for the disturbance and displacement of those ancestral remains.

- | | | | | | |
|----|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 2. | A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

(ii) As discussed above, the ICPDS sent AB 52 consultation notification letters on December 10, 2019 and received response comment letters from the Quechan Indian Tribe (via email) on December 13, 2019, December 23, 2019 and February 7, 2020. A comment letter was received from the Campo Band of Mission Indians on December 19, 2019 (see Appendix D). The comments provided by the Quechan Indian Tribe have been acknowledged by the ICPDS and the Cultural Resources Survey Report (Appendix B) has been updated accordingly. Based on the information provided by the Campo Band of Mission Indians, the ICPDS is willing to implement MM-TCR-1 through MM-TCR-3, above, for the Proposed Project. The Proposed Project would comply with these mitigation measures to avoid or reduce impacts to tribal cultural resources to less than significant levels.

Cumulative Impacts:

Based on the response comment letters from the Campo Band of Mission Indians received by the ICPDS, implementation of MM-TCR-1 through MM-TCR-3, above, would avoid or reduce impacts to tribal cultural resources to less than significant levels. Similar to the Proposed Project, any related projects would be required to conduct AB 52 consultation and analyze and mitigate potential impacts to tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with site specific mitigation measures to avoid or reduce potential impacts. Therefore, cumulative impacts would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) | Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

a) The Proposed Project consists of the replacement of an existing bridge with a new and improved bridge structure within the same alignment as the existing bridge over the New River. Minimal water use would be required for construction activities as part of the Proposed Project. Construction water use would be limited to dust suppression. The water used for such activities would be obtained off-site and would not require any new water connections. An IID culvert is located to the east of the Proposed Project site that empties into the New River. The Proposed Project would not be expected to result in alterations or relocation of the IID culvert. As such, the Proposed Project would not cause for the relocation or construction of water or wastewater. Therefore, Proposed Project impacts associated with the relocation or construction of water or wastewater would be considered less than significant.

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|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) | Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

b) As discussed in Response XIXa, above, water for the Proposed Project would be obtained off-site for construction activities limited to dust suppression. Water would be trucked in since the amount anticipated for dust suppression would not necessitate the need for new water facilities or expansion of existing water facilities. Therefore, less than significant impacts related to water supplies would occur.

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|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) | Result in a determination by the wastewater treatment | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

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 consist of the replacement of an existing bridge with a new and improved bridge structure within the same alignment as the existing bridge over the New River. Accordingly, the Proposed Project would not generate wastewater and there would be no change from existing conditions and no need for additional wastewater treatment during operation. During construction, sanitation waste and wastewater (i.e., human generated waste) would be disposed of at a local wastewater treatment plant in accordance with sanitation waste management practices. The Proposed Project would not hinder the local wastewater treatment provider's service capacity. Therefore, impacts associated with wastewater treatment capacity would be less than significant.

- 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) Implementation of the Proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during construction activities including wood, metal, soil, and vegetation. Solid waste materials generated during the Proposed Project's construction would be collected, analyzed for contaminants, and characterized based on analytical results. All construction materials and debris would be removed from the area and recycled or properly disposed of off-site at County approved facilities (i.e., landfills). The County administers and operates nine (9) landfills. The Proposed Project would not generate a considerable increase in solid waste that would exceed the capacity of the 9 County operated landfills. Additionally, all work would be completed pursuant to applicable State, local, and County regulations and policies related to solid waste, including the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72 – Solid Waste Management). Compliance with all applicable State, local, and County regulations and policies would ensure impacts related to solid waste would be less than significant.

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

e) As discussed in XIXd, above, the Proposed Project would be required to comply with the County's Solid Waste Ordinance (Imperial County Municipal Code, Chapter 8.72 – Solid Waste Management). As a bridge replacement project, the Proposed Project would generate a limited amount of solid waste during construction activities. As a result, the Proposed Project would not generate a considerable increase in solid waste. However, solid waste generated by the Proposed Project during construction would include soil. While the material excavated for the Proposed Project would be collected, analyzed for contaminants and sent for recycling or disposed of off-site at a licensed waste facility, as discussed in Section IX, *Hazards and Hazardous Materials*, the Proposed Project may release hazardous materials into the environment with the disturbance of soil at the Proposed Project site during construction as the soil may be contaminated by the polluted New River, which the Proposed Project crosses. Site grading during construction of the Proposed Project would redistribute on-site soils that may need disposal. These soils may be contaminated from the New River. If these soils are contaminated, the temporary disturbance and potential disposal of these soils during grading may create a significant hazard to the public and environment. However, implementation of mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 would ensure that potentially contaminated soils are identified, removed, and properly disposed of to prevent the creation of significant hazard to the public and the environment to the maximum extent feasible and reduce impacts to less than significant levels.

Cumulative Impacts:

As a bridge replacement project, the Proposed Project would not require water use or generate solid waste during operation. During construction, the Proposed Project implementation would require minimal water use and generate solid waste. The Proposed Project would adhere to and be consistent with applicable State, local, and County regulations and policies. As discussed in Response XIXe, above, the Proposed Project would implement mitigation measures MM-AQ-1 and MM-HAZ-1 through MM-HAZ-6 should soils on-site be contaminated by the polluted New River and reduce impacts to less than significant levels. Thus, the Proposed Project's contribution to cumulative impacts to utilities would be less than significant.

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) According to the map prepared by CAL FIRE for the County, the Proposed Project is located within an LRA classified as Unzoned, with the nearest VHFHSZ located approximately 25 miles northwest of the Proposed Project (CAL FIRE, 2007). The Proposed Project would be designed to applicable County and AASHTO standards and, as a result, provide adequate emergency access. The Proposed Project would not reduce the number of traffic lanes or create physical barriers along Lack Road. As the existing bridge has been closed to traffic for over one (1) year due to severe deterioration of some of the pile

supports, implementation of the Proposed Project would improve all existing emergency access for adjacent properties and the surrounding community and reduce lengthy detours for all commuters that either live or work along that stretch of Lack Road. Therefore, implementation of the Proposed Project would not impair emergency response or emergency evacuation in the County, but would actually improve it. Additionally, the Proposed Project would not include or create any physical barriers on roadways that would impede emergency access within the area or to the Proposed Project site. Therefore, no impacts would occur.

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

b) As discussed above, the Proposed Project is located within an LRA classified as Unzoned, not within a VHFHSZ. The nearest VHFHSZ is located approximately 25 miles northwest of the Proposed Project. The Proposed Project is a bridge replacement project, which would not contain project occupants. The nearest sensitive receptors are residences located approximately 1.1 miles south of the Proposed Project and approximately 1.9 miles northeast of the Proposed Project. Therefore, the Proposed Project would not expose project occupants to wildfire and no impacts would occur.

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

c) As a bridge replacement project, the Proposed Project would not require installation or maintenance of additional infrastructure that may exacerbate fire risk. Therefore, no impacts would occur.

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 site is located in a flat area with no high or steep natural slopes. The Draft Foundation Report stated no indications of landslides or deep-seated instability were observed at the Proposed Project site during the geotechnical study (Appendix C). As such, the potential for landslides would be considered low. There would be no potential for the Proposed Project to expose people or structures to landslides. Therefore, the Proposed Project would not result in impacts related to the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability or drainage changes. No impacts would occur.

Cumulative Impacts:

The Proposed Project would not result in impacts related to wildfire. The nearest VHFHSZ is located approximately 25 miles northwest of the Proposed Project. As a bridge replacement project, the Proposed Project would not substantially affect the potential for wildfire to occur in the Proposed Project area. Therefore, the Proposed Project would not contribute to significant cumulative impacts related to wildfire within the County.

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

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

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

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

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?

As discussed in Section IV. *Biological Resources*, above, burrowing owl, a CDFW Species of Special Concern, and Yuma Ridgway's Rail, a federally endangered species, are both known to occur in the vicinity of the Proposed Project site. However, the Proposed Project's BSA did not have any sign of either species and no burrows were located within the BSA. Additionally, no nesting birds or bats were observed during the pedestrian survey. With removal of vegetation during construction that is suitable for nesting birds and since the Proposed Project is subject to the jurisdiction of USACE, CRRWQCB and the CDFW, implementation of MM-BIO-2 and MM-BIO-3 would ensure that potential impacts to biological resources would be below the level of significance.

As discussed in Section V. *Cultural Resources*, above, there are no known resources located within the API. Additionally, with regard to paleontological resources, though the Proposed Project area is underlain by Quaternary lake sediments (Q), which have a high sensitivity for paleontological resources, the potential to encounter a paleontological resource would be considered low given the previously disturbed nature of the Proposed Project area. Therefore, less than significant impacts would occur with implementation of mitigation measures.

- 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.)

Cumulative impacts associated with the Proposed Project are being considered in connection with the past, present, or reasonably foreseeable future projects in the area. As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, cultural resources, energy, land use/planning, mineral resources, population/housing, public services, recreation, transportation, utilities and service systems, and wildfire would be less than significant. Additionally, the Proposed Project would result in less than significant impacts with mitigation related to air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources. The mitigation measures that have been developed for the Proposed Project would assist in the assurance that cumulatively considerable contributions would result in less than significant impacts.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?
- Cumulative impacts associated with the Proposed Project would result in less than significant impacts.

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.

- **COUNTY OF IMPERIAL**

- V. Jim Minnick, Director of Planning & Development Services
- VI. Michael Abraham, AICP, Assistant Director of Planning & Development Services
- VII. Mariela Moran, Project Planner
- VIII. Imperial County Air Pollution Control District
- IX. Department of Public Works
- X. Fire Department
- XI. Ag Commissioner
- XII. Environmental Health Services
- XIII. Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- (i) Engineering Consultant
 - a. NV5
 - Jack Abcarius, P.E., Project Manager
 - Hilary Brinegar, Environmental Project Manager
- (ii) Environmental Consultants
 - a. Environmental Intelligence, LLC
 - Amariah Lebsock, Senior Project Manager
 - Leanna Williams, Project Manager
 - Rebecca Gilbert, Senior Archaeologist
 - Michael Flores, Senior Biologist
 - Robyn Walker, Technical Editor
 - b. Barrett's Biological Surveys
 - Marie Barrett, Biologist

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

V. REFERENCES

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VI. MITIGATED NEGATIVE DECLARATION – County of Imperial

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

Project Name: Imperial County Public Works Department Lack Road Bridge Replacement Project

Project Applicant: Imperial County Public Works

Project Location: The Proposed Project is located approximately 5.8 miles northwest of the City of Westmorland where Lack Road crosses the New River at bridge No. 58C0101 in Imperial County, California (Exhibit 1, *Regional Vicinity*). The existing bridge is a seven (7) span, simply supported untreated DF stringers bridge with laminated timber decking and AC cover, supported by treated timber pile bents and pile bent abutments with timber seating walls that runs north and south over the New River. The existing bridge is approximately 106 feet in length and 27 feet wide. The approximate limits of the Proposed Project area would extend along Lack Road from approximately 300 feet south to 350 feet north of the New River. Lack Road is a north/south road that supports direct access from State Route (SR-) 86 to Imperial County Route S-30. The Proposed Project is located 0.3 mile south of Vail Road and 0.2 mile north of Foulds Road (Exhibit 2, *Project Location*).

Description of Project: Due to severe deterioration of some of the pile supports, the existing bridge has been closed to traffic (inactive) for over one (1) year. The County Public Works Department (Applicant) proposes to replace the existing seven (7) span timber bridge with a new precast concrete bridge designed to current American Association of State Highway and Transportation Officials (AASHTO) standards with California amendments (Exhibits 5 and 6, *Site Plan and Typical Section*). The proposed new bridge design would consist of a single-span bridge with four (4) precast/prestressed bulb-tee girders supported on two (2) abutments. The new bridge dimensions would be 35 feet and 6 inches wide by 125 feet long, with a structure depth of 7 feet and 0.875 inches. The selection of a precast bridge structure would eliminate the need for construction to take place within the New River.

The proposed roadway would remain a single travel lane in each direction, and geometry for the Proposed Project would be based on applicable County and AASHTO standards. The new bridge would be reconstructed in the same alignment with two (2) 12-foot-wide lanes designed for a 55 mile per hour (mph) vehicular speed. Shoulder widths would be 4 feet on the bridge, and would transition to the existing width at the roadway conform points. The new bridge would be designed to withstand a 100-year flood event.

The existing bridge would be removed without having to enter the New River as all construction activities were designed to take place from the river banks. It is estimated that the Proposed Project would be constructed over a nine (9)-month period beginning in March 2020 and concluding in November 2020.

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 Mitigated Negative Declaration based upon the following findings:

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



The Initial Study identifies potentially significant effects but:

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

A **MITIGATED NEGATIVE DECLARATION** will be prepared.

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


NOTICE

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

3/2/20
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

2/27/20
Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

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