

**Appendix A – No. 23**

**PROPONENT'S ENVIRONMENTAL ASSESSMENT  
ENVIRONMENTAL CHECKLIST**

***Site name: El Centro ILA***

**Prepared for  
California Public Utilities Commission**

**Prepared by  
Level 3 Communications, LLC**

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## ENVIRONMENTAL CHECKLIST

**1. Facility Title:**

Level 3 Long-Haul Network, El Centro ILA

**9**

**2. Lead Agency Name and Address:**

California Public Utilities Commission  
Van Ness Avenue, San Francisco, CA 94102  
(415) 703-2782

**3. Contact Person and Phone Number:**

Bill Vander Lyn, Level 3 Communications, LLC  
6689 Owens Drive, Suite A, Pleasanton, CA 94588  
(925) 398-3040

**4. Facility Location:**

The project site consists of two contiguous parcels (APN 054-031-30 and 054-031-31) located at 1198 and 1202 Industry Way, El Centro, Imperial County, California. The parcel totals 2.19 acres. The project site is located approximately 1 mile north of Interstate 8, approximately ¼ mile east of S. Dogwood Road, and approximately 200 feet north of the intersection of Ross Road and Industry Way. The project site is located within the Centerpoint Industrial Park. The lots within the industrial park are currently vacant. All sites are graded and will be developed for industrial land uses. (See Figure 1, Regional Map; Figure 2, Site Vicinity Map; Figure 3, Parcel Map; and Figure 4, U.S.G.S. Quad Map; Figure 5, Surrounding Use Map; and Figure 6, Photo Key Map and referenced photos).

A Mitigated Negative Declaration (MND No. 97-4) was adopted by the City of El Centro for the subdivision of the land constituting the Centerpoint Industrial Park (Tentative Subdivision Map No. 54-310-02). The MND reviewed the environmental impacts of the subdivision of the project area into 22 lots for industrial development. The proposed project site is located on lots 5 and 6 of the approved subdivision.

**5. Proponent's Name and Address:**

Level 3 Communications, LLC ("Level 3")  
1450 Infinite Drive, Louisville, CO 80027  
(303) 926-3000

**6. General Plan Designation:** Planned Industrial (IP)

**7. Zoning:** General Manufacturing (MG)

**8. Description of Facility:**

This checklist evaluates the design, construction, and operation of the El Centro In-Line Amplification Facility (ILA). This facility, which will support the Long-Haul network, will be located outside a utility corridor.

The El Centro ILA will occupy two graded but currently undeveloped parcels in an existing industrial subdivision on Industrial Way in El Centro. Total acreage of the site is 2.19 acres. Approximately 5,000 square feet of the site will be developed for ILA facilities and associated access roads and parking areas.

Prefabricated ILA structures will be delivered and placed on a newly constructed, engineered concrete pad. A separate generator structure will be constructed utilizing another concrete pad.

An ILA station is required to receive signals and amplify the light power that comes into it before transmitting the signal along the fiber optic cable. Signal amplification capabilities are required approximately every 60 miles or less along the network.

The proposed ILA station will include up to four prefabricated, transportable, modular amplification units (huts), each measuring 12 feet by 36 feet (432 square feet), and 10 feet 3 inches in height. The set of four huts will be installed on a 24-foot-by-72-foot (1,728 square feet or 0.04 acre) section of the former building pad and will be attached side-by-side.

One 300-kilowatt, 449-horsepower (hp) diesel-powered generator will provide emergency power to the set of four ILA huts. The separate pre-cast concrete generator housing or shelter will be approximately 12 feet wide, 24 feet long (288 square feet), and 10 feet high and will be installed on a concrete pad. The pad will be equipped with vibration isolators to effectively reduce groundborne vibration caused by generator operation. The vibration isolator would also reduce structure-borne noise by interrupting noise transmission paths caused by "sounding-board" effect. Insulation will be provided as needed for noise abatement. The generator will be mounted on a 1,000-gallon, double-walled, above-ground storage tank that is 13 feet long by 8 feet wide by 1 foot 9 inches high. The double-walled storage tank on which the engine/generator set is mounted is designed to support the weight of the engine/generator set and this mounting is a common design for emergency engine/generators. For engine/generator sets that are operated more frequently, the fuel tank is mounted separate from the engine/generator since greater fuel storage capability is required and the storage tank would be too large to be located beneath the engine/generator (Rice, 1999). The tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote).

All structures will arrive pre-assembled. No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. A paved parking area and two paved driveways will be installed to support construction and maintenance activities. Fencing around the ILA facility will be of chain link construction and will be eight feet tall. A locked gate will restrict access to the site.

The El Centro ILA will require electricity and telephone. Overhead utility poles currently run along the western edge of the property. Utilities in the industrial subdivision will be installed underground based on the conditions of the subdivision's approval by the City of El Centro. Normal electrical power will be provided, consisting of 400-amp, 480-volt, three-phase service. All on-site utility lines will be run underground per NEC and local codes. No water or sewer hookups are anticipated because the site will not be permanently staffed. No site grading is anticipated. A minimal change in impervious surfaces will occur due to the installation of concrete foundations of the ILA huts and generator pad, and construction of the paved driveway and parking area.

Figure 7 is a conceptual plot plan of the El Centro ILA site showing required setbacks and locations of utility and vehicle access. The area bounded by the setbacks is the "development window" within which the ILA facility will be situated. The precise location of the ILA facility will be determined during the engineering design phase of the project.

Site development will require no grading for placement of the generator shelter or for access and parking. Installation of the generator and ILA shelter foundations will be engineered and completed prior to delivery of prefabricated components (i.e., shelter placement), placement of the fiber optic cable line, and installation of utility connections. Erection of perimeter fencing will occur prior to all improvements. The fiber optic cable will access the ILA from Industry Way at the southeast corner of the property.

The connection to the ILA facility will be installed at a depth of approximately 42 inches either by plowing in the conduit (which does not require a trench) or by digging a trench, laying the conduit, and

back-filling. During construction, no offsite areas will be required for mobilization or parking of construction or worker vehicles. Estimated construction waste is 97 cubic yards.

During operation at 100-percent load, the 449-hp generator consumes approximately 22 gallons of diesel fuel per hour (gph). At 75 percent load, fuel consumption rate is 16.5 gph. During most of the 30 minutes of testing and maintenance run time each week, the generators will run at 50-percent load. However, for the purposes of this "worst-case" calculation, Level 3 assumes a 75-percent load and 30 hours of run time each year (i.e., 1/2-hour/week times 52 weeks, plus four hours contingency). Therefore, 30 hours per year multiplied by 16.5 gph equals 495 gallons of diesel fuel consumption per year for testing and maintenance. Testing of the emergency generator will be controlled remotely, and will not be part of site maintenance activities. Negligible solid waste will be generated during site operation.

Level 3 will equip each generator with a spill tray beneath the filling port and a spill emergency response kit. The kit will consist of a 55-gallon drum containing oil-absorbing booms and pads, tarps, duct tape, and shovels. These materials will be placed near the filling port for immediate access should a release occur. A laminated placard listing the number of an emergency response contractor and appropriate spill-reporting procedures will be contained in the drum and will also be displayed near the filling port. Should a release occur that Level 3 personnel could not manage, the emergency response contractor will be called.

In line with its commitment to environmental compliance, Level 3 will train technical staff regarding safety and spill-response procedures that should be implemented during diesel fuel deliveries. These written procedures will define the necessary steps for use and disposal of spill containment equipment located at the site. A Level 3 technician will accompany any third party contractor delivering fuel. Because the facilities are kept locked, the Level 3 technician will unlock/lock the security gate during ingress and egress. The technician will advise the contractor as to the location of the filling port for the fuel tank, describe the site safety requirements, observe the fueling process, and listen for the high fuel alarm. Should a release occur, the Level 3 technician will immediately initiate containment and cleanup procedures.

The ILA site will not be permanently staffed. It will be visited approximately once a week for routine maintenance, data downloading, and fuel tank filling (assumed for analysis purposes to be 60 trips per year).

Current and potential cumulative projects in the vicinity of the proposed El Centro ILA site are provided in Table 1. Criteria for inclusion of a project in Table 1 are as follows:

- Projects are within two miles of the site. In some cases these projects are in more than one jurisdiction.
- Projects are scheduled for construction from one year before to one year after the "construction window" for the Level 3 facilities, or between March 1999 to March 2003.
- Current projects include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified.
- Potential projects are those that have been formally submitted to the lead agency and which are defined well enough to discern where they are, what they are (type of land use), and how big they are (acres, dwelling units, square footage, etc.). Although these submitted, but not approved projects are considered "speculative" under CEQA, they give an indication of potential future development around the facility site.

**9. Surrounding Land Uses and Environmental Setting:**

Surrounding land uses are industrial and agricultural in nature. The project site is surrounded on the north and south by undeveloped parcels within the Centerpoint Industrial Park, zoned for industrial development. Additional undeveloped industrial parcels are located adjacent to the project site on the

east, across Industrial Way. Adjacent to the project site on the west is a heavy equipment storage and repair facility. South of the project site beyond Ross Road is an existing agricultural use, currently planted with crops. Additional agricultural fields currently planted with crops are east of the project site beyond Industry Way and the adjacent land uses.

**10. Other Agencies Whose Approval is Required:**

The site is located within the jurisdiction of the City of El Centro. The proposed project would require administrative site plan approval, per section 29-39(b)(41) of the City of El Centro Zoning Ordinance.

The Imperial County Air Pollution Control District (ICAPCD) is responsible for compliance with air quality standards. Imperial County is located within the Salton Sea Air Basin, which also includes the Coachella Valley in Riverside County.

**PROPONENT'S DETERMINATION**

On the basis of this initial assessment, the proposed facility would not have a significant effect on the environment because the Environmental Commitments described below would be incorporated into the design and construction of the facility. A Negative Declaration would apply to this facility.

**Environmental Commitments**

The proposed facility is an element of the project addressed in an Application for Modification of an existing Certificate of Public Convenience and Necessity (CPCN) (Decision No. 98-03-066). That CPCN was supported by a Mitigated Negative Declaration that included mitigation measures to be implemented in the design, construction and operation of the previously approved telecommunications facilities within existing utility rights-of-way. Level 3 has incorporated all mitigation measures outlined in the previous Decision into its design of the project addressed in this Proponent's Environmental Assessment (PEA). Therefore, the actions previously imposed as mitigation measures in the CPCN Decision are now Environmental Commitments for the facility addressed herein. In summary, these Environmental Commitments include:

- Measures to mitigate potential impacts to various resources;
- Commitment to obtain all required local, regional, state and federal approvals and permits required for construction and operation of the project;
- Coordination with local and resource management agencies;
- Notifications of adjacent property owners;
- Coordination with other utility projects in the area; and
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA.

**Mitigation Measures**

No Mitigation Measures are recommended for the El Centro ILA site. All potential impacts can be avoided or reduced to less-than-significant levels through implementation of Level 3's Environmental Commitments.

## ENVIRONMENTAL IMPACTS

### I. AESTHETICS

#### Setting

The project site consists of two contiguous parcels located along the west side of Industrial Way. The combined lots measure 2.19 acres in size. Both lots have been cleared of vegetation. In addition, both lots have been graded but remain unpaved. The site is located within a planned industrial park, known as the Centerpoint Industrial Park, which is in the early stages of development. Currently, all the lots along Industry Way are graded. Streets, curb, gutter, streetlights, and underground utilities have been installed in preparation for sale of the lots within the industrial park for development.

The only developed site adjacent to the project is an industrial use located to the west, containing heavy equipment storage and minor repair facilities (Figures 5 and 8). Agricultural uses occur south and east of the Centerpoint Industrial Park. Two single-family rural residences are associated with the surrounding agricultural uses to the east, with the nearest residence located approximately 535 feet from the project site (Figure 5 and 8).

The project site is currently visible from Industrial Way, Ross Road, and Interstate 8 (Figure 2). When surrounding industrial lots are developed, it is not likely that the project site will be visible from Ross Road and Interstate 8. The project is not visible from a state (California State Scenic Highway System, 1999) or locally (City of El Centro General Plan, 1990) designated scenic highway, or other scenic resources.

The City has landscaping requirements for new development in manufacturing zones. The proposed project would comply with any applicable local policies for aesthetics during the City's required Site Plan approval process.

#### Evaluation

a) Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is located in an area characterized by industrial and agricultural development and is not located in the vicinity of a scenic vista. The project would not have a substantial adverse effect on a scenic vista.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site is not visible from a state scenic highway or other scenic resources. Thus, the project would not substantially damage scenic resources within a state scenic highway.



c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The project involves the placement of prefabricated ILA structure(s) on two undeveloped parcels. The project area is planned for industrial development and the proposed project would be consistent with such development. The project would not substantially degrade the existing visual character or quality of the site and its surroundings.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Project design includes the installation of one exterior building light at each structure entrance. The project structure would not create a new source of substantial light or glare affecting daytime or nighttime views in the area.

## II. AGRICULTURAL RESOURCES

### Setting

The project site consists of two undeveloped parcels, totaling 2.19 acres, zoned for industrial development. The project site is located within the Centerpoint Industrial Park, which was recently subdivided and is in the early stages of development. Prior to the subdivision of the land in the Centerpoint Industrial Park, the project site was used for agriculture. The project site is located on land designated as prime farmland by Imperial County (Estrada, 1999). The Centerpoint Industrial Park land was taken out of agricultural production approximately 5 years ago (Mealey, 1999). The site is not located on state-designated Prime Farmland, nor is it under a Williamson Act contract (Estrada, 1999). There are no local policies for agricultural resources which apply to the project site.

### Evaluation

a) Would the project 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?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as designated by the state, therefore the proposed use would not convert such farmland to non-agricultural use. The project site is located on land designated as prime farmland by Imperial County. The project site was previously converted from agricultural use, thus the proposed project would not convert additional County-designated prime farmland to non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
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The project site is not zoned for agricultural use. The site is located in a general manufacturing (MG) zoning district, as designated by the City of El Centro. The project site is not covered by a Williamson Act contract.

c) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
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The project site is located in an industrial park in the early stages of development. The proposed project would not convert agricultural land to non-agricultural use, as the project site was previously converted from agricultural production. Development of the ILA would not result in growth-inducing effects or other off-site changes to the environment which would result in the conversion of farmland to non-agricultural use.

### III. AIR QUALITY

The El Centro ILA will occupy two graded but currently undeveloped parcels in an existing industrial subdivision, on a site totaling 2.19 acres. Approximately 5,000 square feet of the site will be developed for ILA facilities and associated access roads and parking areas.

Criteria air pollutants will be generated during construction of the ILA facilities and during operations of the fiber optic network. Construction emissions sources include installation of a concrete pad for placement of the up to four ILA huts and an emergency standby generator, delivery of the prefabricated huts, generator, and generator shelter, trenching to install the fiber optic innerduct, and installation of limited driveway and parking facilities to support site operations. Construction activities, including travel to and from the site will contribute emissions of fugitive dust.

During ILA operations, emissions will be generated by the 300-kW, diesel-powered emergency standby generator during testing and power failures. Travel to and from the site for weekly maintenance visits will also contribute incrementally to emissions of criteria air pollutants.

Table 3 provides relevant information on construction and operation activities contributing to emissions of pollutants based on the above scenario. Methodologies, algorithms, and assumptions used to make these emissions estimates are provided as Attachment A. Included in Table 3 are the following construction-related items:

- Estimate of one-way commuting distance (miles) that members of the construction crew will travel to the construction site and numbers of such trips.
- Equipment (e.g., graders, excavators, and water trucks) that will be used at the construction site. Included are the size and number of units of each type of equipment, and the numbers of hours per day and days that each piece of equipment will operate.
- Material delivery vehicles (e.g., cement and gravel trucks) are represented in terms of number of trips per day, total number of trips, and number of one-way miles traveled.
- The amount of material (soil) that will be disturbed during trenching operations on the proposed site.

A key assumption implicit in the estimation of fugitive dust and emissions construction equipment is that only one piece of equipment will operate at any one time. Off-site emissions due to workers commuting to and from the site, equipment delivery, and other on-road vehicles will occur simultaneously (e.g., during the same day) with emissions from on-site construction equipment. Therefore, maximum daily emissions are determined by the summation of emissions from the highest emitting piece of construction equipment and on-road emissions that occur on the same day as that piece of construction equipment is operating.

Operations-phase activities at the site will be limited to weekly generator tests and weekly site visits for maintenance, data logging, and (as necessary) refilling of the generator fuel tank. Both activities generate emissions of criteria air pollutants. The 300 kW emergency standby generator will be tested for 30 minutes per week. Normal operations will be powered by electricity from the utility power grid. A conservative estimate of 60 trips per year is used to determine mobile source emissions resulting from project operations. Generator testing is automated and is not part of the weekly maintenance schedule.

Table 3 shows the emission factors and other parameters used to calculate exhaust and fugitive PM<sub>10</sub> emissions for mobile equipment (U.S. Environmental Protection Agency, 1996). In addition, emissions from ILA operations are estimated based on manufacturer emissions guarantees (Caterpillar, 1999) and emissions resulting from maintenance operations.

### **Setting**

The site is located in southern Imperial County within the city limits of the City of El Centro. The Imperial County Air Pollution Control District (ICAPCD) is responsible for compliance with air quality standards. Imperial County is located within the Salton Sea Air Basin, which also includes the Coachella Valley in Riverside County. The site is also in the Imperial Valley Planning Area, which covers the western three-quarters of the county. The Salton Sea Air Basin is currently designated as a nonattainment area for state ozone and respirable particulate matter (PM<sub>10</sub>) standards. The site also lies within a sub-region of the Salton Sea Air Basin that is designated as a nonattainment area for the national ozone and PM<sub>10</sub> standards. The City of El Centro itself is a nonattainment area for the state carbon monoxide standard (California EPA, 1998b).

Based on the past three years of monitoring data collected at various monitoring stations throughout Imperial County, maximum ozone concentrations exceed the national ozone standard (0.12 parts per million) on an average of approximately 14 days per year and exceed the more stringent state standard (0.09 parts per million) on an average of approximately 74 days per year (California EPA, 1998a). The ozone problem in Imperial County is primarily due to mobile sources and from transport of pollutants from the South Coast Air Basin and Mexico.

Ambient PM<sub>10</sub> concentrations in Imperial County exceed the national 24-hour-average standard of 150 micrograms per cubic meter roughly 12 percent of the time. PM<sub>10</sub> concentrations exceed the more stringent state 24-hour-average standard of 50 micrograms per cubic meter roughly 75 percent of the time, based on monitoring data from 1995 to 1997 (California EPA, 1998a). Fugitive dust, which is largely attributable to travel on paved and unpaved roadways, construction and demolition activities, farming operations, and wind erosion of the sparsely-vegetated landscape, constitutes the largest contributor to PM<sub>10</sub> emissions within Imperial County. Transport from the Mexicali area also contributes to elevated PM<sub>10</sub> levels.

Ambient carbon monoxide concentrations in El Centro did not exceed the national one-hour-average carbon monoxide standard of 35 parts per million between 1995 and 1997, but occasionally exceed the more stringent state one-hour-average standard of 20 parts per million (California EPA, 1998a). The state and national eight-hour-average carbon monoxide standard of 9.0 parts per million is violated on an average of approximately 12 days per year. The carbon monoxide problem is due to pollutant transport from Mexicali and from emissions generated within El Centro by motor vehicles not registered in the United States and not subject to federal or state emissions standards.

The Federal Clean Air Act and California Clean Air Act require plans to be developed for areas designated as nonattainment, including strategies for attaining the standards. (No plans are required for areas designated as nonattainment for state PM<sub>10</sub> standards, however.) There are three applicable air quality plans for the facility area, two related to ozone and one related to the national PM<sub>10</sub> standard. While the City of El Centro is also a nonattainment area for the state carbon monoxide standard, the Clean Air Act provisions have not been enforced because of the large impact of emissions from Mexico and Mexican-registered vehicles on ambient carbon monoxide levels (Romero, 1999).

In 1979, Imperial County was designated as a nonattainment area due to periodic violations of the national oxidant standard (which has been replaced by the current ozone standard). In response to this designation, Imperial County prepared a "nonattainment plan" in 1979, as required by federal law. The 1979 nonattainment plan became the federal ozone plan for Imperial County. It proposed the adoption and implementation of a set of stationary source control measures designed to attain the national ozone standard. Under the federal Clean Air Act Amendments of 1990, Imperial County's designation of nonattainment for the national ozone standard was confirmed under the provisions of the Act that also recognize the possibility that international border areas may face special problems in attaining the standard.

The applicable state ozone air quality plan, the 1991 Air Quality Attainment Plan, was prepared in compliance with the State California Clean Air Act (ICAPCD, 1992). The plan recognizes the substantial influence of pollutant transport from Mexico and the South Coast Air Basin on the ozone problem in Imperial County, but also includes a stationary source control measure program to reduce emissions generated within the county. The state ozone plan is normally updated every three years, but because the Salton Sea Air Basin has this unique air quality problem, an update is not required until the significance of the upwind sources has been quantified (Romero, 1999).

Both the federal and state ozone plans rely heavily on stationary source control measures, including New Source Review. As part of the ozone attainment strategy, no significant net increase in emissions from new and modified stationary sources is allowed per ICAPCD Rule 207.

The applicable PM<sub>10</sub> air quality plan is the State Implementation Plan for PM<sub>10</sub> in the Imperial Valley (ICAPCD, 1993). The plan includes a range of measures intended to achieve attainment of the national PM<sub>10</sub> standard in the Imperial Valley Planning Area. The PM<sub>10</sub> plan relies on control of area sources, known as "fugitive dust" sources, such as track-out/carry-out, unpaved roads, bulk material handling activities, material transport activities, and haul trucks. ICAPCD Regulation VIII contains measures for attaining the national PM<sub>10</sub> standards.

General Conformity requirements (40 CFR Part 93, 1998) do not apply to this project since it does not involve a federal action such as the use of federal land or the need to acquire a federal permit for the site.

**Evaluation**

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input checked="" type="checkbox"/>	No Impact  <input type="checkbox"/>
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Air quality plans are in place to implement air quality standards for ozone and PM<sub>10</sub> in the Imperial Valley. Emissions of ozone precursors (CO, NO<sub>x</sub> and ROG) and PM<sub>10</sub> (from mobile and area sources, and PM<sub>10</sub> precursors) are considered in this air quality analysis (Table 3).

The ICAPCD does not establish numerical standard for construction-related emissions of criteria air pollutants. Despite the absence of numerical thresholds, construction activities could, under some circum-

stances, impact the ability of the ICAPCD to achieve the goals of the air quality plans for ozone and PM<sub>10</sub>. However, construction emissions will be of short duration and limited scope. Most of the facilities will arrive pre-assembled, and the site has already been graded for the purpose of industrial development. Level 3's decision to place the ILA in an existing industrial subdivision avoids additional disturbance of undeveloped sites. To further reduce potential impacts, Level 3 will implement dust control measures as specified by ICAPCD rules and applicable best management practices.

Operation-phase activities will generate mobile- and stationary-source emissions of criteria air pollutants. In most circumstances, new stationary sources within the ICAPCD are required to offset emissions increases at a ratio ranging from one-to-one to three-to-one. However, ICAPCD Rule 207.C.2.f (1990) exempts emergency standby generators provided that they are operated less than 100 hours per year for maintenance purposes and operate only during utility power interruptions, and provided that the operator document compliance and coordinate maintenance operations with the ICAPCD. Level 3 will fully comply with the requirement of Rule 207.C.2.f. Travel to and from the site for maintenance purposes is also exempt from offset and permitting requirements under ICAPD Rule 202.E.2.a. Overall contribution to ambient ozone and PM<sub>10</sub> levels from operations-phase activities will be minimal due to the limited maintenance activities required at the site.

The overall level of project activities is very small in relation to the overall level of development within Imperial County. Any impacts to regional air quality are likely to be negligible. Alternative uses of the already-subdivided industrial parcel are not likely to result in a significantly lower emissions levels. Therefore, there will be no significant impact on the implementation of ICAPCD air quality plans.

**Site Specific Environmental Commitments:** Level 3 will take the following actions to implement Environmental Commitments in the CPCN Decision:

- Submit a letter to ICAPCD prior to project construction indicating that an emergency standby generator engine will be located at the project site and that an exemption from offset and permitting requirements is sought under ICAPCD Regulation 207.C.2.f.
- Use the standby emergency generator for the purpose of non-utility power generation during interruptions of service, and restrict testing and maintenance operations to less than 100 hour per year.
- Coordinate generator maintenance operations to prevent adverse air quality impacts per ICAPCD Regulation 207.2.C.f.
- Implement a construction emissions abatement program to minimize emissions of fugitive dust (including PM<sub>10</sub>). The following provisions of ICAPCD Regulation VIII will be enacted:
  1. Material Transport/Hauling: Haul truck loads of bulk materials will be completely covered or enclosed, or will maintain six inches of freeboard on the side, front, and back of the cargo container area. At its peak, the material will not extend above the upper edge of the cargo container area. The cargo compartments of all haul trucks will be constructed and maintained so that no spillage and loss of bulk materials can occur from holes or other openings in the cargo compartment's floor, side, and/or tailgate. Seals on any opening used to empty the load, including, but not limited to, bottom-dump release gates and tailgates will be properly maintained to prevent the loss of bulk material from those areas. The cargo compartments of all haul trucks will be cleaned and/or washed at the deliver site after removal of the bulk material.
  2. Track-Out/Carry-Out: Any bulk material tracked out or carried out onto a paved road surface will be rapidly cleaned up, within 48 hours of deposition. Alternatively, one or more track-out prevention devices or other ICAPCD-approved track-out control devices or wash-down systems will be installed at access points where unpaved traffic surfaces adjoin paved roads. Alternatively, unpaved roads will be paved, chemically stabilized, or graveled, using gravel or other low-silt-content material (less than five percent), for 50 or more consecutive feet at access points where unpaved surfaces adjoin paved roads.

3. Bulk Material Handling/Transfer: Bulk materials will be sprayed with water 15 minutes prior to handling or transfer. Alternatively, chemical/physical stabilization methods will be implemented at handling/transfer points. Alternatively, wind erosion will be prevented by sheltering or enclosing the operation and transfer lines.

- Maintain sufficient documentation of the compliance with all regulatory requirements.

b)	Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The El Centro ILA Site lies in an area designated as nonattainment of the national and California Ambient Air Quality Standards for ozone and PM<sub>10</sub>, and state standards for carbon monoxide.

Criteria air pollutants will be generated during construction of the ILA facility and during maintenance operations. There are no numerical standards for emissions during construction activities in ICAPCD. Emergency generator operations and travel to perform site maintenance activities are exempt from ICAPCD offset and permitting requirements per Rule 207.C.2.f and Rule 202.E.2.a, respectively.

Construction impacts will be short term and limited to the scope described in Section III (a). Maximum daily construction emissions, as analyzed in Table 3, will not exceed 0.03 percent of the daily emissions of NOx, ROG, PM10, or CO in Imperial County based on annual average values for 1995 (California EPA, 1999). Emissions from generator tests will not approach this low threshold. Even neglecting the effects of transport from other counties and air basins, emissions are too small to have a measurable effect on regional air quality. In addition, construction activities will be of limited duration. Operations activities will be infrequent and of limited scope.

Site-Specific Environmental Commitments, as enumerated in Section III (a), will be enacted to further ensure against the possibility of contributing to violations of an air quality standard. The scale of the project and the enactment of the Site-Specific Environmental Commitments stated above will ensure that Level 3 does not significantly impact air quality in Imperial County.

c)	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal and state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The El Centro ILA Site lies in an area designated as nonattainment of the national and California Ambient Air Quality Standards for ozone and PM<sub>10</sub>, and state standards for carbon monoxide.

The El Centro ILA site is the only PEA site under the jurisdiction of the ICAPCD. Level 3 has also received a CPCN for construction of the adjacent fiber optic running line in Imperial County.

Motor vehicles and transport from other air basins are the largest sources of CO, NO<sub>x</sub>, and ROG in the Salton Sea Air Basin. In addition to these sources, fugitive dust emissions are an important contributor to viola-

tions of PM<sub>10</sub> standards. Neither the El Centro ILA, the Level 3 project, nor fiber optic cable construction projects in general, are important in determining regional levels of criteria air pollutants.

The incremental effects of this and related projects are not considerable and will not have a significant impact on attainment of air quality standards in the Salton Sea Air Basin.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

Sensitive receptors are defined as facilities that house children, elderly, and ill members of the population, such as schools, day-care centers, hospitals, retirement homes, hospices, and residences. The site is located in a largely vacant industrial park in a setting characterized by mixed agricultural and industrial uses. However, one single-family residence is located 535 feet east of the site (Figure 8).

Project construction would be of short duration, and effects would be minimized by the use of graded site in an existing industrial subdivision. The use of prefabricated components also limits impacts to nearby receptors. The size of the parcels allows substantial buffering from surrounding development, since only 5,000 square feet of the 2.19-acre property will be developed. The distance to sensitive receptors further reduces any impacts to negligible levels.

Emergency generator testing and site visits during operations phases will be of short duration and will emit small quantities of pollutants. Dispersion of pollutants over the more than 500 feet will reduce pollutant contributions of ILA operation to negligible levels. Therefore, the project will not expose sensitive receptors to substantial pollutant concentrations.

e) Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The only potential odor that may be associated with site construction activities at the El Centro ILA Site will be diesel engine exhaust. The low level of construction activity would not produce enough exhaust to affect the offsite public. Similarly, testing of the emergency generator at the ILA site for no more than one half hour per week will not produce sufficient exhaust nor odor to be objectionable to a substantial number of people

#### IV. BIOLOGICAL RESOURCES

##### Setting

The El Centro site was visited by a Level 3 Team field biologist to evaluate biological resources at the site and in the immediate vicinity. The proposed El Centro site is located within a new industrial development. It is on level land, with no slope or aspect. The entire site has been graded, and is surrounded by other disturbed land uses (Figure 5). The site is bordered by similarly graded land, north and east of the site. Existing industrial developments are found to west. A road and a large agricultural field are located immediately south of the industrial development. Additional agriculture land and a concrete irrigation canal are found further east of the site (Figure 5).

The site is denuded of vegetation or other natural habitat. There are no wetlands in the vicinity of the site.



**Evaluation**

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
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A list of potential sensitive species was generated based on a search of the California Natural Diversity Database (El Centro Quadrangle, California Department of Fish and Game, October 1999) and knowledge of the site vicinity. Only one sensitive species, the burrowing owl (*Athene cunicularia*), was identified (Table 5). This species is highly unlikely to inhabit any area within 500 meters of the site due to local disturbance and insufficient habitat (Table 5).

Migrating bird species frequent the nearby agricultural fields. Flocks of cattle egrets (*Bubulcus ibis*) and white-faced ibis (*Plegadis chihi*) were observed in the field approximately 350 meters from the site during the reconnaissance visit. It is unlikely that proposed activities would significantly disturb these migrating species.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
--	--	---	--	--

No water sources are located on or adjacent to the site. The nearest water source is an unvegetated irrigation canal located approximately 200 meters east of the site. The site does not support any riparian or other natural communities and there are no natural communities in the vicinity of the site. Therefore, no impacts to riparian habitat or other natural community will occur as a result of project construction or operation.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
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There are no areas of potential wetlands on or adjacent to the site. Therefore, no impacts to wetlands will occur as a result of project construction or operation.

d)	Would the proposal interfere substantially with the movement of any native 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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed site and vicinity are characterized by heavy disturbance. It is unlikely that any wildlife species utilize the area as a movement corridor or nursery site.

Migrating bird species frequent the nearby agricultural fields. Flocks of cattle egrets (*Bubulcus ibis*) and white-faced ibis (*Plegadis chihi*) were observed in the field approximately 350 meters from the site during the reconnaissance visit. Considering this substantial distance, it is unlikely that proposed activities would significantly disturb these migrating species.

e)	Would the proposal conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No trees or other vegetation are present on the site. This project has no potential to conflict with local ordinances protecting biological resources.

f)	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are no such plans in effect for biological resources in the El Centro area. Therefore, there will be no impact.

## V. CULTURAL RESOURCES

### Setting

The El Centro ILA Facility site is located in an industrial park which is currently undergoing development at the eastern end of the City of El Centro. The parcel has been graded in preparation for building construction. The land was formerly agricultural.

The project area is located in the region once occupied by the Tipai and Ipai people. The Tipai and Ipai were Yuman speakers (Hokan stock) who occupied San Diego County south of Agua Hedionda Lagoon and the upper reaches of the San Luis Rey River. Further east the boundary was San Felipe Creek. The Ipai occupied the northwestern part of this region while the Tipai extended south into Baja California and southeast into Imperial County. The eastern boundary in Imperial County was the Sand Hills east of the New River. From west to east, the Tipai occupied the coastal, coastal hills, mountains, and desert. The El Centro ILA site is in the desert portion of Tipai territory (Luomala, 1978).

The Tipai were organized into autonomous, semi-nomadic bands within 30 patrilineal clans. Bands traveled in a seasonal round from lower elevations in the winter to higher elevations in the summer. In the desert

areas of Imperial County, people lived at low elevations where water was available in the winter, moved up into foothill canyons in the spring, and into the mountains during the late summer and early fall for the acorn and pinyon nut harvest. They returned to the desert in late fall. Tipai bands whose winter villages were too far out in the desert to make a journey to the mountains feasible gathered mesquite pods, rather than acorns. When living in their winter villages, the Tipai subsisted on stored acorns, pinyon nuts, or mesquite pods. In addition to acorns or mesquite pods, sage and grass seeds were important in the diet. Women and girls were the major collectors and processors of plant foods. They used either bedrock mortars or portable mortars and pestles to pulverize the acorns. The acorn meal was then leached with water to remove the tannic acid. Some Tipai who lived along the New River planted maize, beans, teparies, and melons in newly flooded areas. Planting of crops was done in imitation of the Quechan, Yuman speakers who lived along the lower Colorado River and practiced agriculture. Inland products, such as acorns, agave, mesquite beans, and gourds were exchanged for coastal products such as salt, dried seafood, dried greens, and abalone shells.

San Diego de Alcala was the first mission (A.D. 1769) established by the Spanish in Alta California. The Tipai and Ipai violently resisted Spanish control because the Spanish imposed a sedentary regimen at the mission that prevented the Tipai from following their seasonal round. In 1775, 800 people from 70 bands united to attack and burn the mission. A Spanish priest was killed. However, the Franciscan missionaries persisted and by 1779 there were 1,405 neophytes at the mission. A branch mission was opened in the interior at Santa Ysabel in 1818 that had 450 neophytes by 1821. After 1834 the missions were secularized and mission lands were granted to Mexican citizens. Tipais became laborers or fugitives in the mountains. Their fate was similar under the American administration after 1848. Small reservations were established in the interior in 1875. However, they were not large enough to allow seasonal trips to other habitats.

**Evaluation**

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The protocols contained in Level 3's *Long Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999), requiring records searches and field survey, where appropriate, were followed as summarized below. A technical report, providing more information on the results of the records search and field survey has been prepared (Mason, 1999).

Level 3 archaeologists requested a records search for the proposed El Centro Facility site, and the lands within a one mile radius, from the Southeast Information Center of the California Historical Resources Information System located at the Imperial Valley College Museum, Ocotillo. The search had two objectives: (1) to determine whether previous archaeological investigations have been conducted in the project area, and (2) to provide information on known historic sites or culturally sensitive areas on and in the vicinity of the proposed ILA Facility. The records search from the Southeast Information Center was conducted by Information Center staff who also checked the OHP Historic Property Data File for Imperial County, the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, California Register of Historical Resources, and California Historical Landmarks (California Historical Resources Information System, Southeast Center, File No. 0178, 1999).

In addition, the Level 3 Team sent a letter dated October 22, 1999 to the Native American Heritage Commission (NAHC) requesting a search of the NAHC Sacred Lands file and identification of a contact person or persons within NAHC for follow-on contact/consultation (White, 1999). The response, dated January 4, 2000, indicated that the NAHC search revealed no site-specific information on Sacred Lands (McNulty, 1999). The letter cautioned that absence of information did not necessarily indicate the absence of cultural

resources. A list of Native American contacts that might serve as sources of additional information was also provided. Level 3 has followed up on this response from NAHC by sending letters to NAHC-identified Native American contacts residing in Imperial County, notifying them of the Level 3 project activities and request information they might have on sacred lands. Any response indicating the possible presence of Sacred Lands will be followed up with a detailed, site-specific evaluation utilizing the expertise of the relevant Native American contacts. The results of this effort will be fully documented, as appropriate, in the supporting technical report (Mason, 1999).

The CHRIS records search (File No. 0178) indicated that no historical resources have been previously recorded on or within one mile of the proposed facility site. (California Historical Resources Information System, Southeast Center, File No. 0178, 1999). No historical resources potentially eligible for the California Register of Historic Resources were observed during the field inspection. Therefore, the project will cause no substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines §15064.5.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The results of the records search showed that the property had not been previously surveyed for prehistoric archaeological resources and the field inspection showed that the parcel has been recently graded and there are no archaeological sites on the parcel. No prehistoric archaeological sites have been recorded within a mile of the survey area. No historic archaeological sites have been recorded within one mile of the project area. No cultural resources within one mile of the current project area have been listed on the California State Historic Resources Inventory, the National Register of Historic Places, the California Historical Landmarks, nor the California Points of Historical Interest (California Historical Resources Information System, Southeast Center, File No. 0178, 1999).

On the basis of these results, there will be no impacts to archaeological resources associated with site construction and operation activities.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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As mapped by Strand (1962), the project site is underlain by Holocene lacustrine (lake) deposits (unit QI) of Lake Cahuilla. No fossil vertebrate site is reported as occurring in this rock unit in the project site vicinity by Jefferson (1991a, -b). However, the fossilized remains of land plants, numerous invertebrates (fresh-water diatoms, foraminifers (shelled amoebas), snails, clams, and ostracods (bivalved crustaceans), cold-blooded vertebrates (fishes, frogs, tortoises, lizards, and snakes) as well as birds, and land mammals (rabbits, rodents, horses, bighorn sheep) have been reported as occurring in the Lake Cahuilla deposits at sites throughout the Imperial and Coachella Valleys, as recorded in archives at the Natural History Museum of Los Angeles County Vertebrate Section and Invertebrate Paleontology Section; San Bernardino County Museum; and University of California, Riverside, Campus. In addition, carbon-14 analyses of fossil plant and mollusk remains for these sites provided radiometric age determinations for the fossil-bearing strata (Langenwalter, 1980; Reynolds, 1989; Van de Kamp, 1973; Waters, 1983; Whistler et. al., 1995). These fossil occurrences suggest that there is a potential for occurrence of Holocene fresh-water microfossils and invertebrate fossil remains and continental vertebrate fossil remains at the project site.

**Site-Specific Environmental Commitments:** Level 3's environmental commitment to performing

paleontological monitoring during construction will allow for identification and recovery of any fossils that might be unearthed. As part of the monitoring plan, a preconstruction field survey of the project site will be conducted by a qualified paleontologist, construction-related earth moving will be monitored by the paleontologist or a qualified paleontologic construction monitor to allow for the recovery of larger fossil remains at newly discovered fossil sites, and a small rock sample will be submitted for microfossil analysis. All recovered fossil remains will be fully treated (prepared, identified by knowledgeable paleontologists, curated, catalogued) and, along with associated specimen data and corresponding geologic and geographic site data, placed in a recognized museum repository. The paleontologist will prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with Society of Vertebrate Paleontology (1995, 1996) guidelines for mitigating construction-related impacts on paleontologic resources and for the museum acceptance of a monitoring program fossil collection.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The records search and field inspection provided no evidence of the presence of human remains. If suspected human remains are encountered during construction, operations will stop until the proper official is notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find. The procedures to be followed are described in detail in Level 3's *Long-Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999:25-39), approved by the CPUC.

**VI. GEOLOGY AND SOILS**

**Setting**

The site lies in a relatively flat area in the eastern portion of the City of El Centro. El Centro is located in a geologically active area, with several active faults in the vicinity. The project site is not located in an area susceptible liquefaction, landslide, or subsidence geologic hazards (CDMG, 1973, 1999; SGI, 1999). Erosion activity at the project site is low, and the soils are moderately to highly expansive (SGI, 1999).

**Evaluation**

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of 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 Mines and Geology Special Publication 42. ii) Strong seismic-related groundshaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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Although the project site is not located within an Alquist-Priolo zone (CDMG, 1999), the area is seismically active. The project site area can experience high magnitude groundshaking from nearby active fault systems (i.e., faults exhibiting displacement within the last 11,000 years) (CDMG, 1994). The major active faults in the vicinity of the project site are the Imperial, Wienert, Brawley, Superstition Hills, Superstition Mountain, and Coyote Creek faults (CDMG, 1994). These faults are located approximately 3, 4.8, 6.6, 6.6, and 6.8 miles from the project site, respectively (CDMG, 1994). These faults can produce a maximum earthquake magnitude of approximately 7.0, 6.4, 6.6, 6.6, and 6.8, respectively (CDMG, 1996). A 10% probability of peak ground accelerations of >70% g in 50 years is expected in the project site vicinity (CDMG, 1996).

A rupture of sufficient magnitude along an active fault in the project site vicinity can cause liquefaction in the El Centro area under the right soil moisture conditions (Sylvester, 1979; USGS, 1982). However, because of the limited saturated sandy soil beneath the project site, additional structural design considerations for potential liquefaction events are not warranted (SGI, 1999).

Because of Level 3's environmental commitment to fully comply with all applicable state and local codes, and because the ILA facility would not be occupied on a routine basis, the project would not expose people or structures to substantial adverse effects attributable to these potential geologic hazards. Therefore, no impacts would occur.

**Site-Specific Environmental Commitments:** Any potential seismic hazards will be minimized by compliance with the California seismic code standards and applicable local building and seismic codes (Table 2).

b)	Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is nearly flat and substantially devoid of vegetation. Erosional activity at the project site is low. No site grading will occur during construction and a relatively small area will be disturbed for pad placement and cable placement. The soil disturbed during the trenching and/or plowing activities would be restored within two days of the activities. Therefore, substantial soil erosion or loss of topsoil would not occur as a result of the project.

c)	Would the project 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 landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located in an area susceptible to liquefaction, landslide, or subsidence geologic hazard area (CDMG, 1973; SGI, 1999). The site is relatively flat, and the geologic units and soils on the site are not unstable. The proposed structure would not be inhabited, and would only be used to house the ILA facility. Therefore, the minimal onsite plowing or trenching would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

d)	Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The area in which the project site is located has moderately to highly expansive soils (SGI, 1999). As part of the Proponent's environmental commitment to this project, the Proponent would minimize any potential impacts associated with these soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards). Because of the Proponent's environmental commitment to this project, no substantial risk to life or property would be created. Therefore, no impacts would occur.

**Site-Specific Environmental Commitments:** Level 3 will minimize any potential impacts associated with the expansive properties of onsite soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards).

e)	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Because the proposed ILA facility would not be occupied, water or sewer service, septic tanks or alternative wastewater disposal are not required. Therefore, no impacts would occur.

## VII. HAZARDS AND HAZARDOUS MATERIALS

### Setting

No indications of potential hazardous materials or storage were found at the site in database searches (Vista Information Solutions, *California Site Assessment*, 1999) and during the site visit. A RCRA-Small Quantity Generator (Clarkliff of El Centro, 29 East Ross Road) is located approximately 350 feet south-southwest of the site. A facility with an aboveground storage tank (Imperial Terminal, 15 East Ross Road) is located approximately 900 feet southwest of the site. The contents of the AST are unknown. There are no other hazardous materials/hazardous waste sites within ¼ mile of the site. There are no schools within the vicinity (e.g., ½ mile) of the site. There are no airports in the vicinity of the site and the site is not located within any airport safety zone.

### Evaluation

a)	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A 1,000-gallon, double-walled, aboveground storage tank containing diesel fuel would be located on site to power the emergency generator. This tank would comply with all federal, state, and local regulations for fuel storage, including overfill protection, vapor emissions, containment, and notification. Fuel deliveries

would comply with spill protection and off-loading regulations. Level 3 will provide training and equipment needed to ensure timely and effective response to any uncontrolled release of diesel fuel. Waste generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations. The generator and storage tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security. Therefore, the diesel fuel tank will provide no significant hazard to the public or the environment.

b)	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hazardous materials (diesel fuel) would be stored in an above-ground, double-walled, storage tank, with monitoring, alarm, and leak containment features. The tank would provide hazard containment against reasonably foreseeable upsets and accidents. The tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security. Level 3 will provide training and equipment needed to ensure timely and effective response to any uncontrolled release of diesel fuel.

c)	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No existing school or proposed school is located within one-quarter mile of the site.

d)	Would the project 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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would not be located on a site included on a list of hazardous materials sites (Vista Information Solutions, *California Site Assessment*, 1999).

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 for people residing or working in the project area?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site is not located within an airport land use plan or within two miles of a public airport or public use airport.



f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The site is located within approximately 1/2 mile of a private airstrip (Douthitt Strip, Figure 2). However, the ILA site will not be permanently staffed, and the buildings low-lying and unobtrusive. The ILA facility will provide no safety hazard to planes and the planes will provide no safety hazard to site workers.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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Development of this site would not alter emergency response or emergency evacuation routes. Roadways would not be blocked either during construction or operation, as there is ample space onsite for staging and parking. Industrial Way, which runs by the site, is a private road serving only Centerpoint Industrial Park.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed structure would be located in an urbanized area zoned General Manufacturing (MG). The structure is not located in the vicinity of any wildland areas. Generators would be equipped with spark arrestors to further reduce the potential for loss, injury, or death involving fires.

### VIII. HYDROLOGY AND WATER QUALITY

#### Setting

The site is not located in a 100-year floodplain (ERSI/FEMA, 1999). However, an attached flood hazard map shows the surrounding area (Figure 9). The site is not located in an area that would be subject to inundation as a result of dam failure, tsunami, or seiche.

The El Centro ILA site is not anticipated to significantly modify drainage of stormwater from the site. However, any stormwater drainage measures that may be required at the ILA facility will be installed in accordance with applicable Imperial County codes.

**Site-Specific Environmental Commitments:** The following actions will be taken to ensure that hydrology/water quality impacts are minimized during construction and operation of the El Centro site.

As appropriate, Level 3 will implement the following measures to avoid and minimize effects on any nearby aquatic environments. Appendix E identifies the documents and practices in which these measures will be specified.

- Bore under sensitive habitats when practicable.

- Implement erosion control measures during construction.
- Remove cover vegetation as close to the time of construction as practicable.
- Confine construction equipment and associated activities to the construction corridor.
- Limit refueling activities to areas beyond 100 feet from an aquatic environment.
- Comply with state, federal, and local permits.
- Perform proper sediment control.
- Prepare and implement a spill prevention and response plan.
- Remove all installation debris, construction spoils, and miscellaneous litter for proper offsite disposal.
- Complete post-construction vegetation monitoring and supplemental revegetation where needed.

A Notification of Intent (NOI) will be submitted to the applicable RWQCB and the State Water Resources Control Board for construction of the El Centro site under the *General Storm Water Permit to Discharge Storm Water Associated With Construction Activity*. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and will include the following: 1) Project Description; 2) Best Management Practices (BMPs) for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

Although the area of disturbed ground on the El Centro site will be less than five acres, and will therefore be less than the minimum size requirement for a SWPPP, the cumulative area of the total ILA, 3R, and Distribution Node sites associated with this project is greater than five acres. Accordingly, an NOI will be submitted, and a SWPPP will be prepared.

**Evaluation**

a) Would the project violate any water quality standards or waste discharge requirements?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed facility would not discharge substances that could contaminate water. Hazardous materials (diesel fuel) would be stored in a 1,000-gallon, double-walled, above-ground storage tank, with monitoring and leak detection and containment features. The tank would provide containment of hazardous materials against reasonably foreseeable upset and accidents. Level 3 will provide training and equipment needed to ensure timely and effective response to any uncontrolled release of diesel fuel. Wastes generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project will not extract groundwater, therefore, groundwater supplies will not be depleted, nor will the project interfere appreciably with groundwater recharge because a relatively small area of the site would be covered with impervious surfaces.

c)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Installation of concrete pads for the ILA huts and the emergency generator and construction of a paved driveway and parking area will cover a relatively small area of the site. The flat terrain and sandy soils will encourage infiltration of excess water onsite. Therefore, effects on the existing drainage pattern will be minimal. No stream or river course will be impacted. The impact to erosion or siltation on- or off-site should be less than significant.

d)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Installation of concrete pads for the ILA huts and the emergency generator and construction of a paved driveway and parking area will cover a relatively small area of the site. The flat terrain and sandy soils will encourage infiltration of excess water onsite. Therefore, effects on the existing drainage pattern will be minimal. No stream or river course will be impacted. The impact to the rate or amount of surface runoff in a manner which would result in flooding on- or off-site should be less than significant.

e)	Would the project 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?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The project would not substantially create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems because the installation of concrete pads for the ILA huts and the emergency generator would cover a relatively small area and the flat terrain and sandy soils will encourage infiltration of excess water onsite. The ILA structures and generator will be house in shelters. Therefore, there will be no external sources of pollutants that could contribute substantially to runoff. Level 3 will develop and implement appropriate stormwater pollution prevention measures as documented in the site-specific SWPPP. Therefore, the impact to both the volume of stormwater runoff and its pollutant load will be less than significant.

f)	Would the project otherwise substantially degrade water quality?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Installation of two concrete pads for the ILA huts and emergency generator may marginally increase the quantity of stormwater runoff; however, the project would not result in polluted runoff since there will be no external sources of pollutants. The project will neither use water nor generate wastewater, and there will be

no controlled discharge of substances that could contaminate water. Therefore, impacts will be less than significant.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The project would not include housing. The project is not located within a 100-year floodplain (ERSI/FEMA, 1999). Therefore, there will be no impact.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The project is not located within a 100-year floodplain (/FEMA, 1999). Therefore, there will be no impact.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The site is subject to flooding from failure or leakage of a dam (Hoover Dam, Imperial Dam) or from a degraded watershed or drainage system (City of El Centro General Plan, 1990, page IX-6). A person will be in the facility only once per week and for a short period of time to perform maintenance. The probability of impact to human life from dam or drainage system failure is therefore, minimal.

j) Would the project expose people or structures to a significant risk of loss, injury or death due to inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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Since the site is subject to inundation from dam failure (City of El Centro General Plan, 1990, page IX-6), it would be subject to impact if a seiche was released. The site is too far from the ocean to be impacted by a tsunami. Since the site is located on flat, developed land and is surrounded for several miles by flat land, the potential for impact by a mudflow is minimal.

**IX. LAND USE PLANNING**

**Setting**

The General Plan Land Use Designation for the project site is Planned Industrial (IP). The El Centro General Plan defines the IP land use designation as follows:

Planned industrial designation is intended to provide for the development of a wide range of industrial, manufacturing, select business and related establishments in a park-like setting.

The Zoning Designation for the project site is General Manufacturing (MG). This zoning designation is defined in the City of El Centro Zoning Ordinance as follows:

This zone is intended to provide for the development of manufacturing process, fabrication, and assembly of goods and materials which do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions which are detectable beyond the boundary of the zone. Certain outdoor operations are permitted in this zone (Section 29-38).

Section 29-39 of the El Centro Zoning Ordinance lists permitted and conditional uses in Manufacturing zones. "Utility distribution substations and utility yards" are permitted uses in the MG zoning district [Section 29-39(b)(41)]. Permitted uses in Manufacturing zones must obtain administrative Site Plan [Section 29-41(j)] approval from the City of El Centro Planning Department.

The City has adopted local policies for Growth Management (Urban Development Program). The project site is located within the Tier II Planned Urban Service Area. This area is designated in the City's 1990 General Plan for future urban growth.

The following local policies for industrial land uses are found in the Land Use Element of the City of El Centro General Plan and may apply to the proposed project:

- To prevent intrusion of all incompatible uses that would reduce the efficiency of the industries and their opportunities for growth.
- To protect adjacent residential areas from the intrusion of industry related noise, light, and visual clutter by proper screening, landscaping, and the use of buffers.
- All storage and waste areas should be screened from view to enhance the quality of the environment.
- An extensive program of overall industrial area beautification and maintenance should be encouraged to assure the maintenance of a high quality for all industrial districts.

**Evaluation**

a) Would the project physically divide an established community?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The project site is located in an area characterized by industrial and agricultural development. There are no established neighborhoods or other communities located in the immediate project vicinity. The project would not result in physical or visual division of an established community. Therefore, there will be no impact.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The project site is located in the General Manufacturing (MG) Zoning District as designated by the City of El Centro. The proposed project is considered a permitted use in the MG zone and would be allowed subject

to Site Plan approval. Site Plan approval is an administrative process, reviewed by the City Planning Department, and does not require a public hearing. Building, electrical, and other permits, as appropriate, would be required prior to construction. The proposed project would comply with all local planning and land use policies through compliance with the City's Site Plan approval process. The project proponent has committed to comply with any City-imposed Conditions of Approval. Therefore, there will be no impact.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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There are no such plans in effect for biological resources in the El Centro area. Therefore, there will be no impact.

**X. MINERAL RESOURCES**

**Setting**

The project site is not in an area designated by the State or the City of El Centro for known mineral resources (Estrada, 1999). There are no local policies for mineral resources which apply to the proposed project or project site.

**Evaluation**

a) Would the project 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?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project involves the installation of pre-fabricated ILA structures on a partially improved site. The project is not located in an area of known mineral resources, therefore no impacts to mineral resources of value to the region or the residents of the state are anticipated.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan other land use plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The proposed project involves the installation of pre-fabricated ILA structures on a undeveloped site. The site is not designated as having locally important mineral resources, therefore no impacts to locally important mineral resources would result. The project site is not in an area designated by the State or the City of El Centro for known mineral resources (Estrada, 1999). There are no local policies for mineral resources which apply to the proposed project or project site.

**XI. NOISE**

The El Centro ILA Site is located in the eastern section of the City of El Centro in Imperial County (Figure 2). The facility will occupy approximately 5,000 square feet of two parcel totaling 2.19 acres. The site is located in a newly developed and largely vacant industrial park. An industrial storage yard borders the property on the west, part of which is currently used to perform heavy equipment repair (Figure 5). A building on the parcel is 60 feet from the property boundary (Figure 8). Agricultural land is located approximately 220 feet south of the site (Figures 5 and 8). The nearest sensitive receptor is a single-family residence 535 feet east of the parcel (Figures 5 and 8).

Estimated daytime and nighttime ambient noise levels are 52 dBA and 47 dBA respectively, typical of quiet commercial and industrial areas (Schomer and Associates, 1991). Ambient noise is considered in the noise level analysis. The site is located 0.57 south of a private airstrip (Douthitt Strip, Figure 2), but is not within an airport land use plan.

Noise will be generated during construction and operations phases of the project. Construction activities include installation of a concrete pad for placement of the up to four ILA huts and an emergency standby generator, delivery of the prefabricated huts, generator, and generator shelter, trenching to install the fiber optic innerduct, and installation of limited driveway and parking facilities to support site operations. Operations phase activities include the operation of the emergency standby generator during 30-minute weekly tests and interruption of utility power service and weekly site visits for facility maintenance. Weekly visits by a single light truck will not perceptibly increase ambient noise levels and require no further treatment in the noise analysis.

Noise from off-site construction activities, associated with personnel vehicles and material delivery and refuse dump trucks, was not included because all vehicles will travel legally on local streets and state highways and will not remain stationary for a significant period of time to create a noise disturbance. As stated in Section III (Air Quality), site access is generally easy and direct, and traffic will not be blocked on local streets or highways for any significant period of time.

**Evaluation**

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input checked="" type="checkbox"/>	No Impact  <input type="checkbox"/>
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Local noise standards apply to both construction and operations-phase activities.

Table 3 provides relevant information on construction and operation activities and equipment contributing to noise. Included is the size of each type of heavy construction equipment and the numbers of hours per day that each piece of equipment will operate. A key assumption implicit in the evaluation of noise impacts is that only one piece of heavy construction equipment will operate at any one time. Therefore, the maximum construction noise level at each site is based on the noisiest piece of construction equipment. This maximum potential noise (at full engine power) for normally-muffled diesel-powered construction equipment up to 200 horsepower (hp) measured at 50 feet is 84 dBA (U.S. EPA, 1971).

The City of El Centro restricts construction to Monday through Saturday between the hours of 6 a.m. and 7 p.m. (City of El Centro Municipal Code, Section 17.1-8(a)). The City of El Centro also limits exposure of residential property to construction noise levels in excess of 75 dBA, as measured at the residential property line, to no more than eight hours in a 24-hour period (City of El Centro Municipal Code, Section 17.1-

8(b)). Because the distance to the nearest residence is greater than 500 feet, Level 3 construction activities will comply with construction noise level limits without the need for any site-specific environmental commitments associated with noise abatement.

The emergency generator will be the only perceptible source of operational noise. The generator will be tested weekly for one 30-minute period. The 300-kW generator will be enclosed in a specially-insulated 12 by 24 by 10 foot shelter that limits noise levels to 85 dBA at a distance of 5 feet from the enclosure.

The City of El Centro limits the one-hour, daytime exterior noise level to 75 dBA in industrial zones at the property line of the affected parcel (City of El Centro Municipal Code, Section 17.1-4; Alvarado, 1999). Using an insulating enclosure that reduces generator noise to 85 dBA at 5 feet from the shelter will reduce the one-hour average noise level during generator tests to 72 dBA Leq on the adjacent industrial properties when set back at least 15 feet from the property line.

In addition to restricting one-hour average exterior noise levels values, the City of El Centro provides guideline for community noise equivalent levels (CNELs). CNELs of less than 75 dBA for industrial areas and less than 60 dBA for residential areas are "normally acceptable" (City of El Centro General Plan, Noise Element, 1990). Because the site is not in close proximity to any residential areas and generator testing is of short duration, this standard is less stringent than that of City of El Centro Municipal Code, Section 17.1-4 and will easily be achieved using an insulated, 85 dBA-rated generator shelter.

**Site Specific Environmental Commitments:** Level 3 will take the following actions to implement Environmental Commitments in the CPCN Decision:

- Install the generator in a noise-insulating enclosure that reduces noise levels to 85 dBA at five feet from the structure.
- Restrict generator testing to the hours of 7 a.m. to 7 p.m.
- Install the generator at least 15 feet from the property line of the ILA parcel.

Implementation of stated Site-Specific Environmental Commitments will ensure compliance with municipal noise ordinances and the applicable general plan noise element.

b) Would the proposal result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The low level groundborne vibration and noise generated during construction will be short term in nature, and generally will not extend more than a few feet from the active work area. There is only one receptor adjacent to the site, an industrial storage and repair yard. There are no sensitive receptors within 500 feet of the site. In addition, the area to be developed is small relative to the parcel size and will provide additional buffering against groundborne vibration and noise. Groundborne vibration at all receptors will have less than significant impact.

The 300 kW generator is the only potential source of excessive groundborne noise or vibration from site operations. The generator will be mounted on rubber isolators which will effectively reduce groundborne vibration by more than 95 percent (Ace Mountings Company, 1999). Additionally, the vibration reduces structure-borne noise by interrupting noise transmission paths caused by "sounding-board" effect. The distance from the generator to the nearest receptor will be greater than 60 feet. Therefore, no persons will be exposed to groundborne noise or vibrations during facility operations.



c)	Would the proposal result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There will be no permanent noise sources at the facility. Therefore, there will be no impact.

d)	Would the proposal result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Temporary increases in ambient noise levels will occur during the up to two months of construction. These temporary increases will comply with the local construction noise ordinance. The existing parcels are largely vacant, and the only occupied adjacent parcel contains an industrial storage and repair facility. The nearest sensitive receptor is more than 500 feet away. Compliance with local noise ordinances will ensure that construction impacts are less than significant.

Weekly generator testing will be limited to thirty-minute intervals. This short-duration generator noise will be greatly reduced by compliance with local noise ordinances and implementation with Level 3 Site-Specific Environmental Commitments (see XI (a), above). The industrial and agricultural nature of immediately surrounding land uses has a relatively high threshold for significant noise impacts. A finding of less than significant impact is appropriate.

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 expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site is not located within an airport land use plan nor is within two miles of a public airport. Therefore, there will be no impact.

f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A private airstrip (Douthitt Strip, Figure 2) is located 0.57 north of the project site. Construction noise will be of limited duration and operational noise will be temporary and of short duration. Noise levels from the project cannot be characterized as "excessive" and will not conflict with the existing noise ordinance and general plan designation of the area. Therefore, there will be no impact.

**XII. POPULATION AND HOUSING**

**Setting**

The project site is located in the City of El Centro with an estimated 1999 population of 37,955 (Estrada, 1999). The project site has been improved in anticipation of development, and is located within the developing Centerpoint Industrial Park. The nearest housing is located approximately 535 feet west of the site (Figure 8) along Ross Road, and consists of a single-family rural-residential home associated with the adjacent agricultural land. A second single-family rural residential home is located approximately 1100 feet northeast of the project site. There are no local policies for population and housing which apply to the proposed project or the project site.

**Evaluation**

a)	Would the project induce substantial 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)?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project would not directly or indirectly induce population growth. The proposed project involves the installation of an ILA facility on a vacant industrial site. The project would not be permanently staffed and would be visited by one service person approximately weekly. The project would not induce new employment and no new housing or extension of major infrastructure would result.

b)	Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No displacement of existing housing units would result from implementation of the proposed project. The proposed project involves the installation of an ILA facility on a vacant industrial site.

c)	Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project involves the installation of an ILA facility on an undeveloped parcel in the Centerpoint Industrial Park. No people would be displaced.

**XIII. PUBLIC SERVICES**

**Setting**

The project site is located in the eastern section of the City of El Centro. Fire and police protection are provided by the City of El Centro. The nearest fire station is located approximately one-half mile northwest of the project site at Dogwood Road and Wensley Avenue (Figure 2).

Two public parks are located within approximately 1 mile of the project site. Mc Gee Park is located one mile northeast of the project site, and Stark Field located 1 mile west of the project site (Figure 2). Washington Elementary School is located approximately 1 mile northeast of the project site. An alternative education school is located approximately 1/2 mile west of the project site near the corner of Ross Road and Hope Street.

There are no local policies for public services which apply to the proposed project or project site.

**Evaluation**

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 or the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project involves the installation of an ILA facility on a graded industrial site. The proposed ILA facility would be not be permanently staffed and would be visited approximately once a week by one service person. The project would not result in the need for new or physically altered government facilities nor affect response time or other performance objectives.

**XIV. RECREATION**

Two public parks are located within approximately 1 mile of the project site. The nearest recreation facilities are Mc Gee Park and Washington Elementary School, located approximately 1 mile northeast of the project site, and Stark Field located approximately 1 mile west of the project site (Figure 2). These facilities provide passive and active recreation activities. There are no local policies for recreation which apply to the proposed project or the project site.

**Evaluation**

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project involves the installation of an ILA facility that will not be permanently staffed on a graded industrial site. The proposed project does not involve residential uses and would not cause a direct increase in the population of the project area. No increase in the demand for, or use of, existing parks or recreational facilities would result from implementation of the proposed project.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	Potentially Significant Impact  <input type="checkbox"/>	Less than Significant with Mitigation Incorporation  <input type="checkbox"/>	Less than Significant Impact  <input type="checkbox"/>	No Impact  <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project involves the installation of an ILA facility on a graded industrial site. The facility would not be permanently staffed. The proposed project would not include recreational facilities nor require the construction or expansion of recreational facilities that might have an adverse effect on the environment.

**XV. TRANSPORTATION/TRAFFIC**

**Setting**

The project site is bordered on the east by Industry Way (Figure 5). Industry Way is a collector street with a right-of-way width of 88 feet. The City of El Centro General Plan defines collector streets as follows:

Collector streets collect and distribute traffic to and from major highways and local streets. Collector streets also serve secondary traffic generators such as shopping and business centers, schools, parks and high density or large-scale residential areas.

Industry Way is a two-lane road in the project area. On-street parking is permitted and sidewalks are provided on both sides of the street. The only traffic-control device on Industry Way is a stop sign at Ross Road. There are no public transit facilities on Industry Way.

The project site is located approximately 200 feet from the intersection of Industry Way and Ross Road. Ross Road is a minor arterial. The City of El Centro General Plan defines arterial streets as follows:

Arterial streets are intended to provide for the movement of through-traffic between major traffic generators such as the Civic Center, the Central Business District, and other commercial centers, and distribute traffic from freeways to less important arterial serving residential areas directly. Insofar as possible, direct vehicular access to abutting properties should, on these arterials, be limited at intervals.

Ross Road is a two-lane road in the project area. On-street parking is permitted in some locations, and sidewalks are provided intermittently in the project vicinity. The nearest traffic control is a four-way signalized intersection at Ross Road and Dogwood Road, west of the project site (Figure 2). Public transit facilities are provided on Ross Road, but none are located in the project area.

The project site is located within the Centerpoint Industrial Park. The surrounding and nearby parcels along Industry Way are currently undeveloped (Figure 5), therefore no driveways onto Industry Way currently exist. Future site access to a number of industrial uses will occur along Industry Way.

The City of El Centro General Plan Circulation Element does not contain a current or projected Average Daily Traffic (ADT) count for Industry Way. The projected ADT for Ross Street in 2001 is 6,190. Level of Service (LOS) C is the City's standard for the primary Circulation System, which includes arterial and collector streets.

The project would comply with any applicable local policies for transportation during the City's Site Plan approval process.

**Evaluation**

a)	Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

During construction at the site, construction workers will be commuting to the site for approximately three months. The average number of commuting workers is expected to be seven. The workers will commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on the site. Occasionally, trucks will deliver equipment and materials to the site and haul construction debris from the site to recycling centers or landfills. These truck trips will be infrequent and off-peak from area traffic flows. The offsite impacts from construction are therefore expected to be less than significant. During operation of the site, one service person would visit the site approximately weekly. The project would not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis.

b)	Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed ILA facility would not be permanently staffed. One service person would visit the site approximately weekly. The project would not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis. Industry Way and Ross Road are not identified in the Imperial County Congestion Management Plan.

c)	Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project would not affect air traffic patterns. Therefore, there will be no impact.

d)	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site would be accessed from Industry Way. Site access would be developed per City requirements and no dangerous design features would result. Therefore, there will be no impact.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site would be accessed from Industry Way. Site access would be developed per City requirements and would result in adequate emergency access.

f) Would the project result in inadequate parking capacity?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The proposed project would involve the installation of pre-fabricated ILA structure(s) on a 2.19 acre graded industrial site and would allow ample space for parking. The project would not be permanently staffed and would be visited approximately weekly by one service person. On-site parking capacity would be adequate for the proposed use, and in accordance with zoning requirements.

g) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turn-outs, bicycle racks)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The City of El Centro General Plan, Circulation Element (1990) has adopted policies for alternative modes of transportation including pedestrian circulation, a bikeway system, and public transit. Industry Way is not designated for any of these modes of alternative transportation. The proposed project would not conflict with any adopted policies, plans, or programs supporting alternative transportation.

## XVI. UTILITIES AND SERVICE SYSTEMS

### Setting

The project site is located within the Centerpoint Industrial Park and is served by water, electric, gas, cable, and storm drainage services. Overhead power lines run east-west along Ross Road and north-south along the western boundary of the project site.

The proposed project involves the installation of an ILA facility on two undeveloped parcels. The ILA facility would not be permanently staffed and would not require gas, water, or wastewater services.

Suburban Waste is the solid waste hauler in the City of El Centro and hauls waste from the project site to the Republic Imperial Landfill on East Robinson Road in Imperial, California. The permitted daily capacity of the Republic Imperial Landfill is 441 tons, and the average daily intake is 210 tons. Estimated construction waste is 97 cubic yards (approximately 64 tons). Negligible solid waste will be generated during operation of the occasionally and temporarily staffed site.

There are no applicable local policies for utilities and service systems in the City of El Centro planning and development documents which apply to the proposed project or the project site.

**Evaluation**

a)	Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project design does not include on-site restrooms or other facilities requiring wastewater service. The site would be unoccupied and would use water only for on-site landscaping or irrigation. Therefore, there would be no increase in the burden on local wastewater treatment facilities, and no impact.

b)	Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site would be unoccupied and does not include on-site restroom facilities. The only water used on-site would be for irrigation of on-site landscaping. Such water use would be minimal and would not result in the need for new or expanded water facilities. Therefore, there will be no impact.

c)	Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would involve some increase in impervious land surface (through building placement and driveway paving), and would marginally increase runoff. However, the site is flat and the soils are sandy, indicating that there is substantial potential that excess runoff will infiltrate onsite soils. The project will comply with all local drainage requirements. It is anticipated that the project would not cause a significantly increased burden on storm water drainage facilities. Therefore, there will be no impact.

d)	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site would be largely unoccupied and does not include on-site restroom facilities. The only water used on-site would be for irrigation of on-site landscaping. Such water use would be minimal and would not result in impacts to existing water resources. Therefore, there will be no impact.

e)	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project design does not include on-site restrooms or other facilities requiring wastewater service. The proposed project involves the installation of an ILA facility on a graded and otherwise improved industrial site. The site would be largely unoccupied and would not increase the burden on local wastewater treatment facilities. Therefore, there will be no impact.

f)	Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is served by the Republic Imperial Landfill on East Robinson Road in Imperial, California. The permitted daily capacity of the Republic Imperial Landfill is 441 tons, and the average daily intake is 210 tons. The proposed project involves the installation of an ILA facility on a graded, industrial site. No demolition would be required. Estimated construction waste is 97 cubic yards (approximately 64 tons). Negligible solid waste will be generated during operation of the occasionally- and temporarily-staffed facility. The project site is served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs. Therefore, there will be no impact.

g)	Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project involves the installation of an ILA facility on a graded and otherwise improved industrial site. The facility would not be permanently staffed and would not generate solid waste on a daily basis. A small amount of construction-related solid waste (estimated at 97 cubic yards) would be generated. The project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, there will be no impact.



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## **Tables**

- Table 1 Current and Potential Cumulative Projects in the Vicinity of the El Centro ILA Site.
- Table 2 Specific Local Policies Applicable to Each Issue Area for the El Centro ILA Site.
- Table 3 El Centro ILA - Construction and Operation Emissions Summary for the El Centro ILA Site.
- Table 4 Potential for Habitat at the El Centro ILA Site to Support Sensitive Species Occurring in the Vicinity.

## **Figures**

- Figure 1 Regional Map
- Figure 2 Vicinity Map
- Figure 3 Parcel Map
- Figure 4 U.S.G.S. Quad Sheet
- Figure 5 Surrounding Land Use Map
- Figure 6 Photo Key Map
- Figure 7 Conceptual Plot Plan
- Figure 8 Noise Receptor Map
- Figure 9 FEMA Floodplain Map



## **Photo Plates**

- Photo A View of Project Site Looking Northwest.
- Photo B View of Project Site Looking West.
- Photo C View of Industry Way Looking North from Front (East) of Project Site.
- Photo D View of Intersection of Industry Way and Ross Road, Looking South from Front of Site.

## **Attachments**

Attachment A      Methodologies, Algorithms, and Assumptions Used in the Air and Noise Analysis.