

SECTION 4. MANDATORY CEQA CONSIDERATIONS

This chapter contains analysis of the CEQA mandated discussions requiring the consideration of a range of issues extending beyond analysis of project-specific impacts to individual resource areas. The topics included within this chapter include:

- Growth Inducing Impacts (CEQA Guidelines §15126.2(d));
- Significant Irreversible Environmental Changes and Irretrievable Commitment of Resources (CEQA Guidelines §15126.2(c));
- Significant and Unavoidable Adverse Impacts (CEQA Guidelines §15126.2(b));
- Energy Conservation (CEQA Appendix F): and,
- Cumulative Impacts.

4.1 GROWTH-INDUCING IMPACTS

Public Resources Code Section 21100(a) (5) requires that the growth-inducing impacts of a project be addressed in the environmental impact report. According to CEQA, a project may be growth-inducing if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to growth, taxes community service facilities, or encourages or facilitates other activities that cause significant environmental effects.

Pursuant to State CEQA Guidelines §15126.2(d), an EIR must “discuss the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...”. The purpose of this section is to evaluate the potential for growth-inducing effects of the Proposed Project. A project would directly induce growth if it would remove growth control barriers to growth, such as a change to a jurisdiction’s General Plan and Zoning Ordinance to allow increased development. The CEQA Guidelines require a discussion of growth inducement, but do not require speculation as to exactly when and where growth may or may not occur, and what form that growth may take.

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area, such as utilities, improved roadways, and expanded public services. Those variables that typically contribute to growth-inducing impacts include the following:

- New development in an area presently undeveloped and economic factors which may influence development;
- The extension of roadways and other transportation facilities;
- The extension of infrastructure and other improvements;

- Major off-site public projects (treatment plants, etc);
- The removal of housing requiring replacement housing elsewhere;
- Additional population growth leading to increased demand for goods and services; and,
- Short-term growth inducing impacts related to the project's construction.

As discussed below, this analysis evaluates whether the proposed project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

- *Potential Indirect Population Growth Impacts from Job Creation.* The proposed project has the potential to indirectly induce population growth by creating approximately three jobs/1,000 square feet for the area. However, the proposed project would more likely respond to regional demand for additional goods and services (see Initial Study, Appendix A). Calexico is currently experiencing a period of population growth. The proposed project would accommodate existing and projected future increased demand for retail services and other services as well as increased demand for jobs. The proposed project would generally accommodate rather than induce population growth.
- *Potential Economic Growth.* The proposed project has the potential to induce economic growth. By creating approximately three jobs/1,000 square feet for the area, most of them unskilled, the proposed project has the potential to help decrease the City's high unemployment rate. With a greater percentage of the population employed, the average spending power of the citizens of Calexico would increase. Thus, the average Calexico resident would have more money to spend on housing and retail goods, which would increase Calexico's tax base for both property and sales taxes. In addition, the proposed project would draw in consumers from neighboring towns. The project's advantageous location near the International Port-of-Entry would encourage people from Mexicali to shop within Calexico's city limits, thus providing a large source of sales tax revenue for the City.

4.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES AND IRRETRIEVABLE COMMITMENT OF RESOURCES

This section considers the effects of the proposed project that would result in a commitment of resources and uses of the environment that could not be recovered following implementation. Public Resources Code Section 21100(b)(2)(B) requires an EIR to include a detailed statement setting forth any significant effects on the environment that would be irreversible if a project is implemented. Consideration of significant irreversible environmental changes pursuant to §15126.2(c) of the State CEQA Guidelines includes evaluation of the use(s) of nonrenewable resources during the initial and continued phases of the project. Furthermore, the EIR must indicate if this use of resources represents an irreversible commitment. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also

irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. An irreversible or irretrievable commitment of resources would occur when resources are consumed, committed, or lost as a result of the project's construction and/or subsequent operation. The commitment of a resource would be "irreversible" if the project started a process that could not be reversed or stopped. As a result, the resource productivity or its utility would be consumed, committed, or lost forever. Commitment of a resource would be considered "irretrievable" when the project would directly eliminate the resource, its productivity, or its utility for the life of the project and beyond.

In addition to the continued commitment of the project site to urban development, the proposed project would involve the consumption of energy derived from nonrenewable sources for electricity to power on-site equipment and fossil fuels for project-related vehicle trips. Building materials could be considered permanently consumed. These changes would be irreversible. Except for the parcel of land to be utilized, consumption of these resources are not unique or significant, and will contribute to regional and local waste management goals related to the diversion of solid waste. As a result, the changes associated with the proposed project's construction and subsequent operation does not constitute significant adverse impacts.

4.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This section indicates those significant irreversible environmental changes that would be involved in the approval and subsequent implementation of the proposed project. The development arising from the construction and subsequent operation of the proposed project will represent a long-term commitment of the project site to the proposed use. The environmental analysis contained in Section 3 of this EIR identified potential adverse impacts that may result from the implementation of the proposed project. None of these impacts will be significant or adverse.

4.4 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. Both CEQA and the *CEQA Guidelines* require that cumulative impacts be analyzed in an EIR. As set forth in the *CEQA Guidelines* Section 15130(b),

"the discussion of cumulative impacts shall reflect the severity of the impacts, and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Section 15130 of the *CEQA Guidelines* requires that an EIR address cumulative project impacts in which the project has possible environmental effects that are individually limited but "cumulatively considerable." The cumulative project list, identified in Table 4-1 and Exhibit 4-1, was provided by the City of Calexico working with the project traffic engineer.

**Table 4-1
Summary of Related “Cumulative” Projects**

Reference No./Project Name	Land Use	Description
#1. Airport Expansion	General Aviation	Additional 46 flight per day
#2. Calexico Gran Plaza	Fast Food Drive-Thru	651,650 sq. ft.
	Factory Outlet Shopping Center	
	Gas Station, Food Mart and Carwash	
#3. Calexico Mega Park	Community Shopping Center	1,100,100 sq. ft.
	Regional Shopping Center	
#4. Border Station Expansion	Border Station*	A total of 6 lanes
#5. County Center II	Public Facility and Institutional Uses	various
#6. Estrella	Single-Family Residential	371 units
	Multi-Family Attached Residential	400 units
	School Site	12.94acres
	Park	5.3 acres
#7. Hallwood/Calexico Place III and Casino	Casino, Hotel, Retail, Office, and Restaurants**	232 acres
#8. Imperial Center	Commercial Center	Various bldgs.,
#9. La Jolla Palms	Single-Family Residential	500 units
	Commercial**	22 acres
#10. Las Palmas	Single-Family Residential	600 units
	Mobile Home Park	73.0 acres
	Senior Complex	115 units
#11. McCabe Ranch I (located outside of the area provided in Exhibit 2-14)	Single-Family Residential	300 units
	Condominiums	127 units
#12. McCabe Ranch II (located outside of the area provided in Exhibit 2-14)	Single-Family Residential	1582 units
	Apartment	718 units
#13. Palazzo	Single-Family Residential	182 units
	Multi-Family Residential	934 units
	Mixed-Use Commercial Village	6.4 acres
	Regional Park	21.62 acres
#14. Remington Condominium	Condominiums	272 units
#15. River View Condominiums	Condominiums	272 units
	Commercial Lots**	63,300 sq. ft.
#16. Venezia	Single-Family Residential	249 units
	Commercial/Retail	12.67 acres

Source: City of Calexico and Infrastructure Engineers.

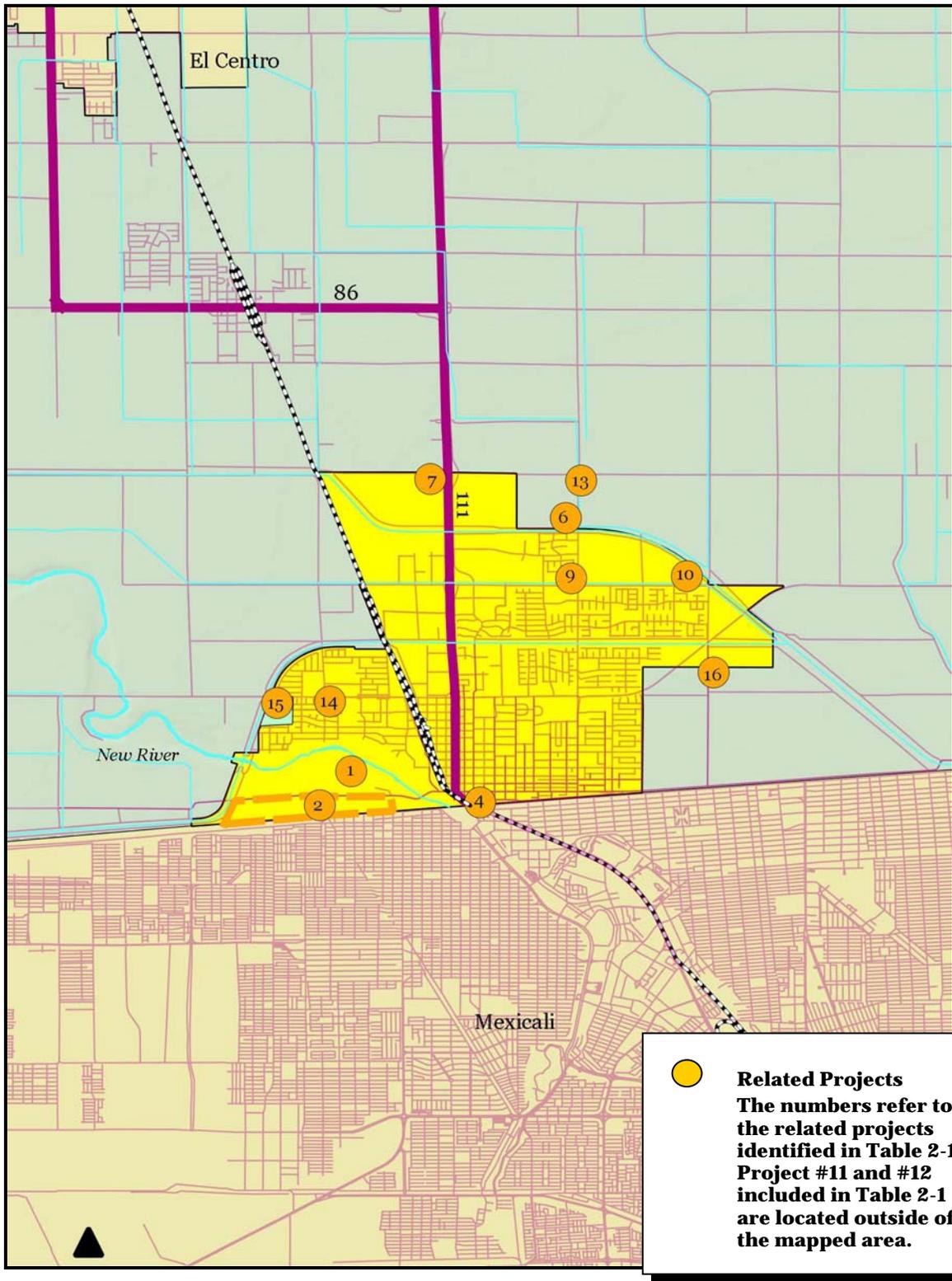


EXHIBIT 4-1
LOCATION OF RELATED PROJECTS
Source: City of Calexico and Infrastructure Engineers

The potential for projects to have a cumulative impact depends on both geographic location as well as the timing of development. The geographic area affected by cumulative projects varies depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the entire air basin, and impacts associated with aesthetics would include the affected view shed. The analysis of cumulative impacts is provided herein in Section 4.5.

This analysis uses the list approach. Table 2-1 included in Section 2.7 lists planned and approved projects that could potentially contribute to environmental effects within the project area. Exhibit 4-1 included in Section 2.7 indicates the location of the cumulative projects. The geographic area affected by cumulative projects varies depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the entire air basin, and impacts associated with aesthetics would include the affected viewshed. The consideration in the regional growth rate applied in both the project completion year and cumulative scenario.

As noted above, projects considered in this analysis include those that have recently been completed, are currently approved and/or under construction, or are in the planning stages. Schedule is particularly relevant to the consideration of cumulative construction-related impacts, since construction impacts tend to be relatively short-term. However, for future projects, construction schedules are often broadly estimated and can be subject to change. Although the timing of the future projects are likely to fluctuate due to schedule changes or other unknown factors, this analysis assumes these projects would be implemented concurrently with construction of the proposed project.

4.5.1 AIR QUALITY

To determine if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is classified as non-attainment, a cumulative impact analysis was performed to evaluate the combined air quality impacts of any given project and the impacts from existing and proposed future developments in the area. This impact analysis considered all planned construction activities within one mile of the project.

The City of Calexico is a nonattainment area for O₃ and PM₁₀. Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified as regional stationary source emissions. Mobile-source emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of daily vehicle miles traveled (VMT) by applicable EMFAC2007 emissions factors. The ADT used for the proposed project was extrapolated from the Traffic Impact Analysis prepared for the project by Infrastructure Engineers in October 2014.

4.5.2 BIOLOGICAL RESOURCES

Implementation of the proposed project, as well as many of the related project, would add to the incremental loss of species habitat in the project vicinity. Habitat loss would affect resident species, including special status species, such as the burrowing owl, ferruginous hawk, and mountain plover. In particular, the burrowing owl is found throughout Imperial County and is considered sensitive due to an overall regional loss of foraging and nesting areas within southern California.

The proposed project and the cumulative projects would be required to implement appropriate mitigation measures to reduce biological impacts to less than significant levels. The mitigation measures identified in Section 3.2 discuss ways in which the project can reduce impacts (e.g., avoiding sensitive breeding/nesting periods, doing pre-construction surveys, and passive relocation of owls), but they do not address the fact that open land would be lost through the implementation of the project. Currently, Imperial County does not have a Habitat Conservation Plan for sensitive species, nor does it have specific mitigation measures for impacts to burrowing owls and other species. The USFWS and CDFG currently accept “passive relocation” of western burrowing owls as adequate mitigation for impacts. Therefore, cumulative impacts to biological resources would be less than significant.

4.5.3 CULTURAL RESOURCES

The only future development project located in the immediate vicinity of the Gran Plaza project is the West Calexico Border Expansion project. With the addition of the border expansion project’s impacts to those of the proposed project, the potential of unearthing unknown historical, archeological, and/or paleontological resources increases. However, as the border expansion project constitutes major development, the project Applicant (in the case of the border expansion, the U.S. General Services Administration) would be required to undergo environmental review similar to the proposed project. The West Calexico Border Expansion project would be required to implement mitigation measures to reduce any cultural resource impact to a less than significant level. Thus, with mitigation measures in place, cumulative impacts from cultural resources would be less than significant.

4.5.4 ENERGY CONSERVATION

The project, together with other regional growth and development, would incrementally increase regional energy consumption. Current annual electricity and natural gas consumption in Imperial County for the non-residential sector in 2008 was 956 million kWh and 29 million therms, respectively (CEC, 2010). This demand is expected to grow at a rate of 1.2 percent per year for electricity and 0.73 percent per year for natural gas between 2010 and 2018 (CEC, 2009a). California is expected to require additional supplies to meet demand through 2025.

The project's contribution to planned cumulative energy demand in combination with other projects' contributions to this demand would be considered cumulatively significant because it would contribute to future demand, which is predicted to exceed current and planned supply.

4.5.5 GREENHOUSE GASES

The proposed project would contribute to global climate change as a result of emissions of GHGs, primarily CO₂, emitted by construction and operational activities. GHG impacts are considered to be cumulative impacts from a climate change perspective (CAPCOA, 2008). Thus, the analysis of GHG emissions is to determine whether the proposed project impact is cumulatively considerable. See Impact 3.5-1 in Section 3.5, Greenhouse Gas Emissions, for a discussion of this cumulatively considerable impact.

4.5.6 HAZARDS AND HAZARDOUS MATERIALS

The hazards and hazardous materials impacts associated with a project like the one proposed are usually localized and occur on a project by project basis, rather than in a cumulative manner. Because the proposed project contains mitigation measures to abate site-specific hazards, any potential cumulative impact associated with the proposed project would be reduced to less than significant levels.

4.5.7 HYDROLOGY AND WATER QUALITY

Concurrent construction of the proposed project with other projects in the vicinity could result in temporary impacts to hydrology and water quality in the project area. These other construction activities could result in increased runoff, erosion, and subsequent sedimentation with impacts to water quality in downstream water bodies and/or storm drain capacity. Additionally, surface water quality could be affected by construction activities that result in the release of fuels or other hazardous materials to stream channels or storm drains, or discharge from excavation dewatering activities.

Adherence to the requirements of the City of Calexico General Plan, City development regulations and RWQCB certification requirements would reduce the above-mentioned project-related impacts to hydrology and water quality to a less than significant level. As such, the contribution of the proposed project to hydrology and water quality impacts would not be cumulatively considerable, and the proposed project would not contribute to a cumulative impact to water quality and flooding.

4.5.8 LAND USE AND PLANNING

The City's General Plan designates future land uses for the build out of vacant land within the city limits and sphere of influence. The Applicant is requesting a General Plan amendment to change the land use designation from I to CH (Commercial Highway). Upon approval of a plan amendment, the project would be consistent with the City's General Plan. The project would have beneficial impacts related to job growth in an area with high unemployment rates and provide the City with a new source of sales tax revenue. In addition, this development would infill an undeveloped area within the City thereby creating a link to other adjacent areas and, taken together with other cumulative projects, would therefore not divide an established community. Thus, cumulative impacts to land use and planning resulting from the development of the proposed project would be less than significant.

4.5.9 NOISE

The Calexico Gran Plaza Traffic Impact Analysis provided the total ADT volumes for the cumulative project scenario; that is, traffic resulting from the existing conditions, the total proposed project, plus all projects in the city that are currently planned. The Federal Highway Administration's Highway Traffic Noise Prediction Model was used to analyze noise increases for the studied roadway segments. Table 3-8 included in Section 3 herein indicates that the project's impacts for the five roadway segments will be less than significant.

Sensitive receptors including residences and sports fields currently exist along roadways that would have significant noise increases resulting from the collective traffic of the proposed project and all planned projects in the city of Calexico. Since the Existing plus Total Project Scenario would not result in a net increase in CNEL dBA for the Jasper Road segments, the project would, therefore, not contribute to noise increases along these segments in the cumulative projects scenario. Thus, the project's noise level contribution to the Jasper Road segments would be insignificant.

The proposed project would have a cumulatively significant noise impact along the roadway segments of Cesar Chavez Boulevard. A sound barrier that could attenuate traffic noises currently does not exist along these roadway segments. In addition, the City of Calexico currently does not have a citywide fee program that would allow future projects to pay a fair-share contribution towards constructing a sound wall along the property lines of existing sensitive land uses. Requiring the project Applicant to construct a sound barrier would not be justifiable because the proposed project is not solely responsible for the significant traffic noise increases along these roadway segments. In addition, the project Applicant does not maintain ownership of the affected properties, and therefore does not have the privilege to construct a sound barrier on these properties. Thus, the project's cumulative traffic noise impacts affecting the roadway segments of Caesar Chavez Boulevard would be considered significant and unavoidable.

4.5.10 TRAFFIC

The proposed project would add to a cumulative increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system; and would exceed, cumulatively, a LOS standard established by the City of Calexico. The cumulative traffic impacts are discussed below for Existing Plus Phase 2A Conditions, Existing Plus Phases 2A and 2B Conditions, and Long-Term (Year 2035) Conditions. Cumulative Project Conditions

2015 Ambient + Cumulative Projects conditions represent the appropriate Year 2015 conditions. To obtain Year 2015 traffic volumes, the traffic generated from the approved/pending projects in the project area that were assumed to be on the road network by the Year 2015 were added onto the existing traffic volumes. The traffic generated from the approved/pending projects was estimated using the cumulative traffic volumes of Linscott, Law and Greenspan's Calexico Gran Plaza Traffic Impact Study, which is based on the *CALTRANS Forecast Year 2025 Calex GP + Model*.

Currently, the main facility serving the Calexico/Mexicali border crossing is at the intersection of SR-111 and 2nd Street. The Calexico West Border Expansion proposes to reopen the location at the intersection of Second Street and Cesar Chavez Boulevard, west of Imperial Highway (SR-111). This is due to the facility being outdated and operationally inefficient to support the growing number of patrons utilizing the border crossing. Under the 2015 Ambient + Cumulative Projects + Phases 2A and 2B scenario, Scenario A of the Calexico West Border Station Expansion traffic study, completed by Katz, Okitsu and Associates in May 2003, has been assumed to be completed. It is assumed that pedestrian and bus traffic will continue to use the existing border crossing, while the remaining vehicle traffic will be re-routed to the West Border Station at Cesar Chavez Boulevard and 2nd Street.

Under Scenario A of the Calexico West Border Station Expansion traffic study, southbound vehicles are assumed to enter the border crossing from the intersection of Cesar Chavez Boulevard and Second Street, while northbound vehicles would be allowed to exit the border crossing both at the intersection of Cesar Chavez Boulevard and Second Street, as well as at the intersection of SR-111 and 2nd Street. Exhibit 4-2 presents traffic volumes of 2014 Ambient + Cumulative Projects + Phases 2A and 2B scenario.

The following is an analysis of 2014 Ambient + Phase 2A Scenario for the study area intersections and street segments. Under 2014 Ambient + Phase 2A Scenario, all of the study intersections are calculated to currently operate at LOS C or better under the City's jurisdiction and at LOS D or better under Caltrans' jurisdiction with the following exception:

- Cesar Chavez Boulevard / SR-98 – LOS F during both the AM and PM peak hours; and,
- Cesar Chavez Boulevard / Grant Street – LOS D during the PM peak hour.

An ILV analysis was conducted for the study intersections under the 2014 Ambient + Phase 2A Scenario. All study intersections are calculated to operate at under capacity for both the AM and PM peak hours. Appendix D of the traffic study contains 2014 Ambient + Phase 2A intersection level of service and ILV analysis worksheets.

Under the 2014 Ambient + Phase 2A Scenario, all of the study area street segments are calculated to operate at LOS C or better on a daily basis with the following exceptions:

- 2nd Street west of Cesar Chavez Boulevard – LOS F
- 2nd Street between Cesar Chavez Boulevard and SR-111 – LOS F
- SR-111 between SR-98 and Grant Street – LOS F

Under the 2015 Ambient + Phases 2A and 2B Scenario, all of the study intersections are calculated to operate at LOS C or better under the City's jurisdiction and at LOS D or better under Caltrans' jurisdiction except the following:

- Cesar Chavez Boulevard / SR-98 – LOS F during both the AM and PM peak hours;
- Cesar Chavez Boulevard / Grant Street – LOS E and F during the AM and PM peak hour, respectively; and,
- Cesar Chavez Boulevard / 2nd Street – LOS E during the PM peak hour.

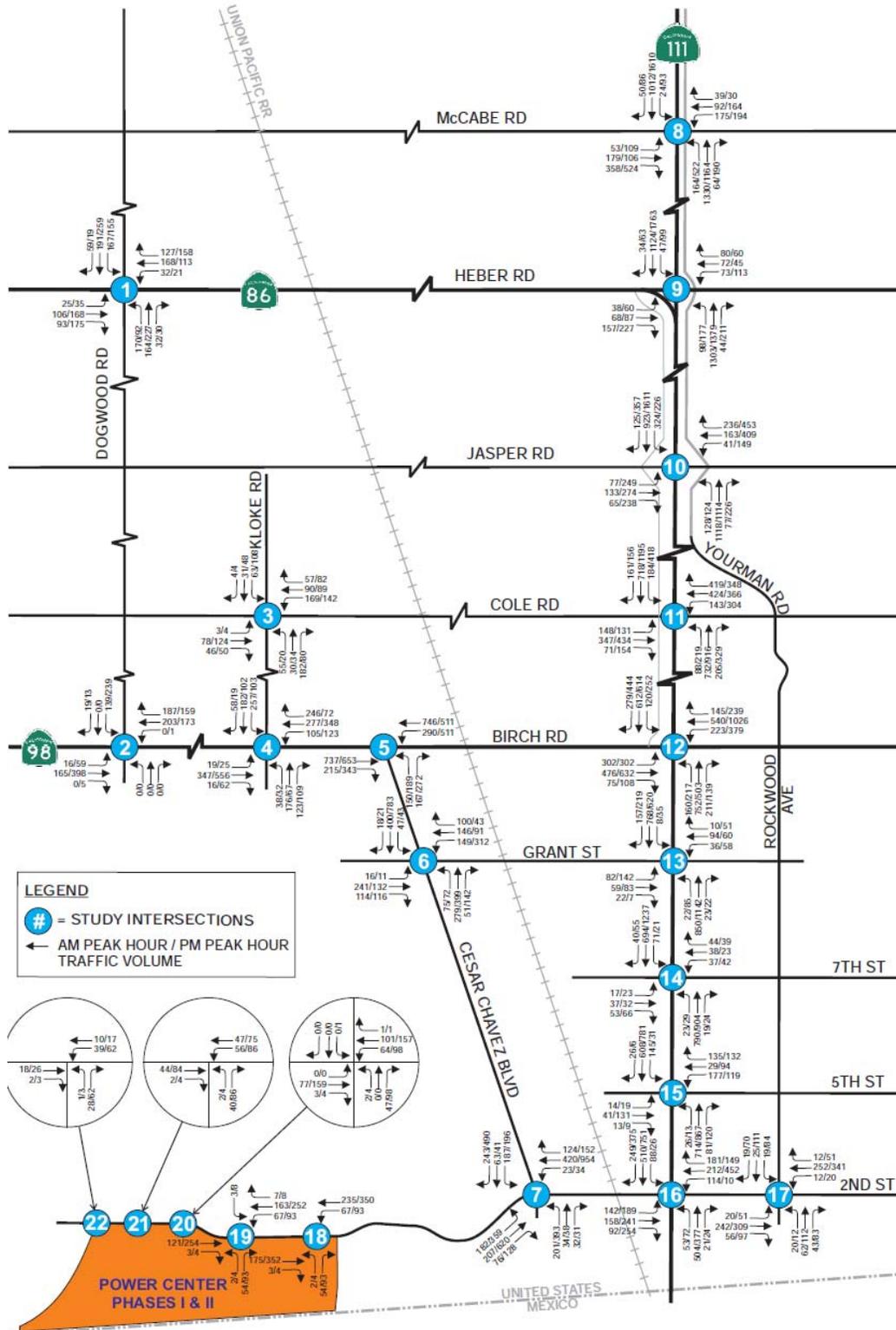


EXHIBIT 4-2
2015 BACKGROUND PLUS CUMULATIVE PROJECT PLUS
TRAFFIC PLUS PHASE 1 AND 2 TRAFFIC
 Source: Infrastructure Engineers

The ILV analysis was conducted for the study intersections under the 2015 Ambient + Phases 2A and 2B Scenario, all study intersections are calculated to operate at under capacity for both the AM and PM peak hours. Appendix E contains 2015 Ambient + Phases 2A and 2B intersection level of service and ILV analysis worksheets.

Under the 2015 Ambient + Phases 2A and 2B Scenario, all of the study area street segments are calculated to currently operate at LOS C or better on a daily basis with the following exceptions:

- 2nd Street west of Cesar Chavez Boulevard – LOS F;
- 2nd Street between Cesar Chavez Boulevard and SR-111 – LOS F; and,
- SR-111 between SR-98 and Grant Street/8th Street – LOS F.

Under the 2015 Ambient + Cumulative Projects + Phases 2A and 2B Scenario, all of the study intersections are calculated to operate at LOS C or better under the City's jurisdiction and at LOS D or better under Caltrans' jurisdiction except the following:

- Dogwood Road / SR-86 – LOS D during the PM peak hour;
- Cesar Chavez Boulevard / SR-98 – LOS F during both the AM and PM peak hours;
- Cesar Chavez Boulevard / Grant Street – LOS F during both the AM and PM peak hours;
- Cesar Chavez Boulevard / 2nd Street – LOS F during the PM peak hour;
- SR-111 / McCabe Road – LOS D during the PM peak hour;
- SR-111 / Jasper Road – LOS F during the PM peak hour;
- SR-111 / Cole Road – LOS D during the PM peak hour; and,
- SR-111 / SR-98 – LOS E during the PM peak hour.

An ILV analysis was conducted for the study intersections under the 2015 Ambient + Cumulative Projects + Phases 2A and 2B Scenario. Under this scenario, all study intersections are calculated to operate at under capacity for both the AM and PM peak hours except the following:

- SR-111 / Jasper Road – Over Capacity during the PM peak hour.

Appendix F of the Traffic Report contains 2015 Ambient + Cumulative Projects + Phases 2A and 2B intersection level of service and ILV analysis worksheets. Under the 2015 Ambient + Cumulative Projects + Phases 2A and 2B Scenario all of the study area street segments are calculated to operate at LOS C or better on a daily basis with the following exceptions:

- 2nd Street west of Cesar Chavez Boulevard – LOS F;
- 2nd Street between Cesar Chavez Boulevard and SR-111 – LOS F;
- Cesar Chavez Boulevard between Grant Street and 2nd Street – LOS E; and,
- SR-111 between SR-98 and Grant Street/8th Street – LOS F.

The following is an analysis of 2015 Ambient + Cumulative Projects + Phases 2A and 2B + Mitigation Scenario for the study area intersections and street segments. Under 2015 Ambient + Cumulative Projects + Phases 2A and 2B + Mitigation Scenario, all of the study intersections are calculated to operate at LOS C

or better operate at LOS C or better under the City's jurisdiction and at LOS D or better under the Caltrans' jurisdiction.

An ILV analysis was conducted for the study intersections under 2015 Ambient + Cumulative Projects + Phases 2A and 2B + Mitigation Scenario, all study intersections are calculated to operate at under capacity for both the AM and PM peak hours. Appendix G of the Traffic Report contains 2015 Ambient + Cumulative Projects + Phases 2A and 2B + Mitigated intersection level of service and ILV analysis worksheets. Under the 2015 Ambient + Cumulative Projects + Phases 2A and 2B + Mitigation Scenario, all of the study area street segments are calculated to operate at LOS C or better on a daily basis with the following exception:

- SR-111 between SR-98 and Grant Street/8th Street – LOS F

The SR-111 segment between SR-98 and Grant Street currently operates at LOS E and is forecast to operate LOS F under all of the near-term scenarios. To mitigate the impact on the segment, widening to a six lane highway is recommended. However, its right-of-way is not available due to existing structures. Therefore, it is not feasible to mitigate the impact on the SR-111 segment between SR-98 and Grant Street.

The following is an analysis of 2035 Ambient + Cumulative Projects Scenario for the study area intersections and street segments. As aforementioned in Significant Criteria, under the long-term scenarios, significant impacts are considered cumulative and LOS D is considered acceptable. Under the 2035 Ambient + Cumulative Projects Scenario, all of the study intersections are calculated to operate at LOS D or better except the following:

- Dogwood Road / Heber Road (SR-86) – LOS E and F during the AM and PM peak hours, respectively;
- SR-111 / McCabe Road – LOS E during the PM peak hour;
- SR-111 / Jasper Road – LOS F during the PM peak hour;
- SR-111 / Cole Road – LOS E during the PM peak hour; and,
- SR-111 / SR-98 – LOS E during the PM peak hour.

ILV analysis was conducted for the study intersections under the 2035 Ambient + Cumulative Projects + Phases 2A and 2B Scenario, all study intersections are calculated to operate at under capacity for both the AM and PM peak hours except the following:

- SR-111 / McCabe Road – Over Capacity during the PM peak hour; and,
- SR-111 / Jasper Road – Over Capacity during the PM peak hour.

Appendix H of the Traffic Study contains 2035 Ambient + Cumulative Projects intersection level of service and ILV analysis worksheets. Under the 2035 Ambient + Cumulative Projects Scenario, all of the study area street segments are calculated to currently operate at LOS D or better on a daily basis with the following exception:

- SR-111 between SR-98 and Grant Street – LOS F.

The following is an analysis of 2035 Ambient + Cumulative Projects + Phases I and II (Near Term Mitigated) Scenario for the study area intersections and street segments. Under the 2035 Ambient + Cumulative Projects + Phases I and II (Near Term Mitigated) Scenario, all of the study intersections are calculated to currently operate at LOS D or better except the following:

- Rockwood Avenue / 2nd Street – LOS F during the PM peak hour.

An ILV analysis was conducted for the study intersections under the 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Near Term Mitigated) Scenario, all study intersections are calculated to operate at under capacity for both the AM and PM peak hours except the following:

- SR-111 / McCabe Road – Over Capacity during the PM peak hour;
- SR-111 / SR-86 – Over Capacity during the PM peak hour; and,
- SR-111 / Jasper Road – Over Capacity during the PM peak hour.

Appendix I of the Traffic Study contains 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Near Term Mitigated) intersection level of service and ILV analysis worksheets.

Under the 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Near Term Mitigated) Scenario, all of the study area street segments are calculated to currently operate at LOS D or better on a daily basis with the following exceptions:

- SR-111 between SR-98 and Grant Street – LOS F.

The following is an analysis of 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Mitigated) + Long Term Mitigation Scenario for the study area intersections and street segments. Table 4-2 presents long-term mitigations for Cumulative Projects and for Power Center Phases 2A and 2B.

**Table 4-2
 Long-Term Mitigations of Cumulative Projects**

#	Intersection/ Segment	2035 Ambient + Cumulative + Phases I and II (Mitigated) + Mitigation
8	SR-111 and McCabe Rd	Convert WB with two (2) left-turn, one (1) through and one (1) through and right-turn shared lane(s)
9	SR-111 and Heber Rd (SR-86)	Widen EB with second right-turn lane
10	SR-111 and Jasper Rd	Widen WB with second through lane
17	Rockwood Ave and 2nd St	Signalization

Under 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Mitigated) + Long Term Mitigation Scenario, all of the study intersections are calculated to operate at LOS D or better. An ILV analysis was conducted for the study intersections under 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Mitigated) + Long Term Mitigation Scenario and all study intersections are calculated to operate at under capacity for both the AM and PM peak hours. Appendix J of the Traffic Study contains 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Mitigated) + Long Term Mitigation intersection level of service and ILV analysis worksheets.

**Table 4-3
Summary of Cumulative Related Impacts, Mitigation Measures, and Fair Share Percentages**

Future Term	#	Intersection/ Segment	Impact Type	Mitigation Measures ⁽¹⁾	Mitigated LOS		Fair Share (%)
					AM	PM	
Mid Term	8	2nd St	Cumulative	Widen to convert WB to two left-turn, one through, and one right-turn lane(s) with signal modification; Add EB right-turn signal overlap			
		SR-111 and McCabe Rd			C	C	4.96%
	10	SR-111 and Jasper Rd	Cumulative	Widen to convert NB one left-turn, two through and one right-turn lane(s); SB one left-turn, two through and one right-turn lane(s); EB two left-turn, one through and one right-turn lane(s); and WB two left-turn, one through and two right-turn lane(s) with signal modifications	C	C	4.80%
	11	SR-111 and Cole Rd	Cumulative	Widen to add WB second through lane with signal modification; and Add WB right-turn signal overlap	C	C	11.23%
12	SR-111 and SR-98	Cumulative	Add SB right-turn signal overlap	C	D ⁽²⁾	18.94%	
Long-Term		SR-111 SR-98 to Grant St	Cumulative	Not Feasible to Mitigate ⁽³⁾	N/A		N/A
	8	SR-111 and McCabe Rd	Cumulative	Convert WB with two (2) left-turn, one (1) through and one (1) through and right-turn shared lane(s) ⁽⁴⁾	C	C	6.21%
	9	SR-111 and Heber Rd (SR-86)	Cumulative	Widen EB with second right-turn lane ⁽⁴⁾	B	D ⁽²⁾	8.78%
	10	SR-111 and Jasper Rd	Cumulative	Widen WB with second through lane ⁽⁴⁾	C	D	4.80%
17	Rockwood Ave and 2nd St	Cumulative	Signalization	B	B	29.71%	
		SR-111 SR-98 to Grant St	Cumulative	Not Feasible to Mitigate ⁽³⁾	N/A		

Note:

⁽¹⁾: Power Center Related Mitigation Measures Only

⁽²⁾: LOS D is acceptable under the Caltrans jurisdiction or as of long-term impacts.

⁽³⁾: In order to mitigate the significant impact, SR-111 would need to be widened to six lane highway standards. However, right-of-way is not available for due to existing structures. Therefore, it is not considered feasible to mitigate the impact on SR-111.

⁽⁴⁾: Mitigations to improve ILV.

Under the 2035 Ambient + Cumulative Projects + Phases 2A and 2B (Mitigated) + Long Term Mitigation Scenario, all of the study area street segments are forecast to operate at LOS D or better on a daily basis except the SR-111 segment between SR-98 and Grant Street (LOS F). The SR-111 segment between SR-98 and Grant Street currently operates at LOS E and is forecast to operate LOS F under all of the long-term scenarios. To mitigate the impact on the segment, widening to a six lane highway is recommended (refer to Table 4-3). However, its right-of-way is not available due to existing structures. Therefore, it is not feasible to mitigate the impact on the SR-111 segment between SR-98 and Grant Street.

4.5.11 URBAN DECAY

While some stores within the Downtown Calexico core may close, a historically high rate of tenancy and a strong tax incentive structure indicate that any vacancies would be filled within a reasonable timeframe. The proposed project and other cumulative projects would not likely result in the closure of any large-scale “big box” retailers in northern Calexico or El Centro as none of the cumulative projects currently include a similar retailer. Also, as vacant buildings in both northern Calexico and El Centro are generally well-maintained, the closure of retailers in these retail areas would not likely result in urban decay, should the development of multiple commercial centers result in the closure of current retailers.

4.5.12 UTILITIES

It is anticipated that the proposed project in conjunction with the cumulative projects in the City listed in Table 2-1, would have significant impacts on the City’s water and wastewater facilities. These cumulative projects would require the existing Calexico WTP to be expanded, and would also require the City’s WWTP be expanded from its current capacity of 4.3 mgd. Pursuant to City Ordinance No. 1036, all development projects within the City, including the cumulative projects, would be required to pay an impact fee per developed acre to assist with the costs of expanding the water treatment facilities (\$11,943/acre), and another impact fee per developed acre to expand wastewater treatment facilities (\$9,291/acre) prior to issuance of building permits. Therefore, impacts would be less than significant.

The combined solid waste disposal needs of the cumulative projects would also significantly increase solid waste generation. The Allied Imperial Landfill was recently approved by the Imperial County Board of Supervisors for an expansion that will double its capacity and allow the landfill to remain open until 2040. Thus, the Allied Imperial Landfill would have sufficient capacity to accommodate this increase in solid waste. Cumulative impacts would therefore be less than significant.

